



**AUSTRALIAN
AUTOMOBILE
ASSOCIATION**

**Constituent
Members**



Australian Automobile Association Response to Proposed Fuel Quality Standard – Ethanol (E85) Automotive Fuel Position Paper

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WORLD WIDE AFFILIATION THROUGH THE AIT AND FIA



The Australian Automobile Association (AAA) supports and coordinates the activities of its constituent motoring clubs and represents the interests of almost 7 million Australian motorists at the national level. The three main policy platforms of the AAA are affordable, safe and sustainable motoring.

The AAA welcomes the opportunity to provide comment on the Proposed Fuel Quality Standard – Ethanol (E85) Automotive Fuel Position Paper from the Australian Government Department of Sustainability, Environment, Water, Population and Communities dated June 2011.

The AAA supports the use of alternative fuels, including E85, by Australian consumers. To provide consumer protection, the AAA is of the view that only fuels meeting appropriate quality standards should be offered to the Australian market. On this basis, the AAA supports the introduction of a mandatory fuel quality standard for E85, and supports the specifications, parameters and test methods as detailed in the discussion paper, with exceptions as noted below. Furthermore, given the fledgling nature of alternative fuels such as E85, the AAA believes that negative perceptions of these fuels must be avoided, as such perceptions would deter consumers from using alternative fuels.

Volatility Classes

The AAA believes that potential cold-start problems with summer blend fuel being used in colder climates would be detrimental to consumer confidence in alternative fuels. Government prescription of the blend to be sold in different climatic regions at different times of year is required to avoid this situation.

Additives

The discussion paper proposes that the Australian E85 standard does not set a limit for additives. Given the serious environmental consequences from spills of additives such as methyl tertiary-butyl ether (MTBE), the AAA suggests that steps should be taken to minimise the risks associated with such substances. We note the stated difficulties in enforcement and administration of the Fuel Quality Standards Act that may arise from specifying inclusion limits for additives. As an alternative to specifying inclusion limits for additives, the AAA suggests that consideration should be given to make an entry in the Register of Prohibited Fuel Additives to prohibit the use of substances such as MTBE.

Density

Since liquid automotive fuels are generally sold by volume, but the energy content is dependent upon mass, for consumer protection, it may be of benefit to include a density specification for E85. The European CEN/TS 15293:2011 specifies a density range and this would appear to be an appropriate value to adopt.

Inorganic Chloride

The AAA favours the introduction of a 1 mg/kg inorganic chloride limit for E85 at the same time as the rest of the standard, with the petrol standard amended concurrently or soon after. Delaying the introduction of the 1 mg/kg limit and/or permitting a higher interim limit risks premature failure of vehicle components, with the potential to adversely affect consumers and undermine consumer confidence in E85 and alternative fuels in general.

Labelling

The AAA notes the proposal to require labelling of E85 automotive fuel, specifying the ethanol content and stating that the fuel is for use in flex fuel vehicles only, and is not petrol or diesel. The AAA is aware of a degree of consumer confusion and misfuelling of vehicles, not only with E85, but with a range of automotive fuels. The AAA is of the view that a consistent and coordinated approach to labelling of fuels is required to alleviate misfuelling across a range of fuels and that this would likely differ from the proposed labelling requirement contained in the position paper.

Conclusion

The Australian Automobile Association is broadly supportive of the proposal to develop a Fuel Quality Standard for E85 automotive fuel, noting concerns and suggestions as detailed above. To protect consumers and preserve consumer confidence in E85, a fuel quality standard should be implemented as soon as practicable.

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