

Public Consultation on the Biofuels Obligation Scheme

Answers to Consultation Questions

Q1.

- A. Yes. Subject to controls in place to enforce a max biofuel rate inclusion, plus max age of biofuel.
- B. Yes, if controlled.

Q2.

- A. No opinion
- B. 12% acceptance if controlled by a max allowable inclusion rate by law plus age of biofuel needs to be limited.

Also, as 33 MJ/KG for biofuel versus 36 MJ/KG for diesel, any increase in biofuel reduces the energy available, thereby increasing the fuel used, hence reducing the MPG for a given trip under similar conditions.

- C. With the 7% FAME limit to maintain fuel quality standards, our question is, what is being used presently to make up the 8.6% inclusion rate. What other competitive biofuels are available like HVO and what are we presently using in Ireland??
- D. No opinion
- E. A max inclusion rate to be legally set and communicated to industry plus the types of biofuels being used after the max 7% FAME inclusion rate is met.
- F. Due to excise exemption, no cost should materialise.

Q3. No opinion

Q4.

- A. Due to lower energy output from biofuels, this will effectively increase the amount blended. i.e. A higher percentage to meet the new measurement using energy reference. This further adds to the need of a max limit on inclusion rate to protect business and their equipment.

Q5.

- A. A barrier to this is the limited supply of CNG/ LNG trucks, little infrastructure and practical barriers to any uptake.
- B. Bio-methane and HVO.

Q6.

- A. Yes.

Q7.

- A. Yes.

Q8.

- B. Yes

Q9. No opinion

Q10.



A. Yes.

Q11. No opinion

Q12. No opinion

Q13. No opinion

Q14.

A. Yes.

Q15.

A. Yes

Q16.

- A. Should be considered.
- B. Lower rate plus new biofuel.
- C. 50% of road transport.

Q17.

As is acknowledged in question 16 in your document, the use of biofuel can and does create issues for the end user.

The IRHA, on behalf of its members again asks that a max limit also be applied to protect our members businesses and equipment.

We are regularly getting reports of fuel filters and tanks blocking with a “jelly like substance” which we know to be from the biofuel inclusion.

Getting an analysis done on these problem cases and the fuel involves has shown levels of biofuel up to 28%. This is unacceptable. In itself but exposes the lack of protection for the end user.

In being forced to use this new blend ratio of biofuel, as Ireland struggles to meet its new carbon targets, the business and consumer needs to be protected by the State.

Such an upper limit would mitigate against such occurrences by reducing the likelihood of its occurrence whilst giving the victims of such unscrupulous behaviour recourse to take action as this upper limit is supported by law.

When Germany had the 8% biofuel mix, it applied an 11% upper or max limit for this reason.

We need something similar in Ireland.

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15th November 2019