



European
Automobile
Manufacturers
Association

Order on the characteristics of the gas oil and low-temperature gas oil referred to as gas oil B10

Notification number: 2017/142/F

Comments from the European Automobile Manufacturers Association (ACEA)

ACEA, representing the European automobile industry, strongly believe that there should be uniformity through the entire European fuels market across all Member States (and beyond). Therefore, ACEA does not support the introduction of diesel containing FAME at a level higher than 7% volume (v/v) as a general market fuel in a Member State of the EU (i.e. diesel for public refueling) since it goes against the principles of the internal market and leads to a fragmented market.

ACEA would like to emphasize that regarding specifications and quality of general market fuels and in order to preserve the benefits of the European single market:

- There should be uniformity across the entire European fuels market (current EU members, future new EU entrants and those who will soon exit the EU). Customers and the wider industry do not want to see a fragmented European fuels market.
- There must be clear CEN quality standards ensuring fit- for-purpose market fuels so that vehicles can operate across Europe without any negative consequences.
- As a result, until there has been an EU review to establish the need to move to higher and EU harmonized levels of high quality low blend biofuels (i.e. higher than B7 diesel and E10 petrol), no Member State should go beyond what is prescribed by the EU Fuel Quality Directive for general market fuels, i.e. providing a harmonized single market for road transport fuels. High quality, high blend biofuels could however be introduced, but only for captive fleets of dedicated vehicles.

Accordingly ACEA does not support an action by a Member State that would introduce diesel blends with a FAME content that is higher than 7% v/v as a general market diesel fuel.

ACEA would request that, for the benefit of customers, all EU Member States ensure that petrol is sold that complies with both Annex I of the Fuel Quality Directive and CEN standard EN228 or, in the case of diesel that is sold, complies with both Annex II of the Fuel Quality Directive and CEN standard EN590.

ACEA recommends that rather than introducing higher diesel blends than B7 as a general market fuel, Member States can consider other measures for the purpose of meeting their own national targets for the use of renewable energy. For example, within the limits of the Fuel Quality Directive, introducing higher biodiesel blends for captive fleets of dedicated vehicles; Introducing, for the general diesel market, commercially available pure diesel-like hydrocarbons made from biomass from Fisher-Tropsch process or hydro-treated vegetable oils, as already indicated in recital 33 of the Fuel Quality Directive.

If a Member State would decide to allow the sale of diesel containing more than 7% v/v FAME in its territory as a general market fuel and assuming it also complies with the Fuel Quality Directive, ACEA requests that the Member State must also:

- Ensure the continued and widespread availability for sale of maximum B7 diesel for customers of those vehicles that will not be able to accept the use of a higher FAME diesel blend. In the case of this notification, without the widespread availability in the market of the common diesel grade acceptable for all diesel vehicles, France would, in effect, compromise the free movement of goods and services by restricting the circulation of vehicles if the required diesel was not available.
- Ensure that any diesel offered for sale containing more than 7% v/v FAME must be clearly and distinctly labelled to enable customers to identify what diesel should be used for their vehicle, as advised by the vehicle manufacturer in the owner's handbook.
- Ensure that any diesel offered for sale will have the necessary parameters and limits to ensure trouble free vehicle operation. Accordingly, the necessary quality parameters and limits must be first investigated and included in the EN standards dealing with diesel quality, i.e. EN590, EN16734 and also EN14214.

Finally, ACEA would respectfully remind the French authorities that the Directive on the Deployment of Alternative Fuels Infrastructure contains an Article 7 on customer information that specifically requires fuel pumps to be labelled with relevant, consistent and clear information from the date fuels are placed on the market. In the note dated 22 December 2016 from Mr Ruijters of DG MOVE to the Member State Permanent Attaches, the European Commission confirmed that the requirements of the labelling standard EN16942 applies only after the expiry of the 24 months period after the adoption of the standard [EN16942]. From that date (i.e. 12 October 2018) diesel pumps dispensing B10 will need to be distinctly labelled using the diesel "B10" identifier in EN16942. If a vehicle were compatible with using "B10", it would be similarly labelled.

If France was to permit the sale of B10 diesel before 12 October 2018, it should nevertheless provide for the customer clear and distinct labelling between B7 diesel and B10 diesel.