

NOTE TO EDITORS

FUEL QUALITY DIRECTIVE TECHNICAL ISSUES

(a) Metallic additives:

ACEA fails to understand why the European Commission gave-in to the lobbying of the US government on behalf of the company manufacturing MMT[®] (1) and why both the Council and the European Parliament consequently did an about-face on their positions which were to ban the use of MMT[®] in petrol.

European petrol does not in general contain MMT[®] but it has been observed in petrol samples in Belgium, Romania and Malta. It is used to boost the octane rating of lower octane base petrol.

ACEA called for the total ban on the use of metallic additives, such as the manganese-based MMT[®] and iron-based ferrocene in petrol (see the 2006 World Wide Fuel Charter (2)) for two important reasons:

- Metallic additives degrade the performance of expensive exhaust catalysts, sensors in the exhaust stream, fuel injectors, spark plugs etc. This means higher and totally unnecessary pollutant emissions and the likelihood that a vehicle's on-board diagnostic (OBD) system will eventually register an emission system fault and inform the driver via the dashboard OBD light, due to no fault other than the petrol in the tank. This results in unnecessary visits to the workshop to repair a fault which is not the result of a failure on the vehicle. Since the legal requirements for the performance and durability of catalytic converters is becoming more stringent, the deterioration (by blocking) of catalysts under customer driving conditions due to metallic additives is expected. Since 1991, all new petrol-engined vehicles in the EU have been fitted with exhaust catalysts and since January 2000, all new petrol-engined vehicles have been equipped with an OBD system;
- Developing major world markets such as China are introducing more stringent pollutant emissions legislation and they are following European standards. EU manufacturers are selling high technology vehicles in these markets and the EU industry is highly competitive in these markets. Unfortunately, the quality of the fuel in these markets is not what it could be and manganese has been observed in Chinese market fuel. ACEA has been pressing these markets to ensure they provide widespread access to market fuel of the right quality in parallel to the introduction of more stringent Euro-emission standards.

An EU ban on the use of metallic additives, including MMT[®], would have closed the door on its use in the EU for good and, importantly, give a very strong signal to other world markets where metallic additives are present in petrol to similarly ban it. ACEA can not guarantee that vehicle emissions will be met as required by the legislation that vehicle manufacturers must comply with if fuel containing metallic additives is used by customers.

ACEA is very disappointed that the EU has not taken a lead in banning the use of metallic additives in petrol but ACEA will keep working with EU policy makers to ensure that the EU bans use of metallic additives as soon as possible.

(b) Blending of FAME in diesel fuel:

In June 2008, ACEA made a commitment(3) that from 2010 all new petrol vehicles will be compatible with petrol containing a maximum of 10% ethanol (E10) and all new diesel vehicles will be compatible with diesel containing a maximum of 7% FAME, Fatty Acid Methyl Ester, (B7). The European Parliament agreement on the Fuel Quality Directive permits a maximum of 7% FAME in diesel. This will be accompanied by the completion of a CEN standard for B7 (EN590:xxx) to provide the other necessary specifications such as oxidation stability which the Fuel Quality Directive need not contain due to its scope being to set fuel parameters on *health and environment grounds*.

(1) MMT[®] - Methylcyclopentadienyl Manganese Tricarbonyl. MMT[®] is manufactured exclusively by Afton Chemical (previously Ethyl Corporation). Ethyl also manufactured tetra-ethyl lead, now banned from use in petrol in a great proportion of the world market where leaded petrol is no longer permitted as the market petrol.

(2) see <http://www.acea.be/images/uploads/aq/Final%20WWFC%204%20Sep%202006.pdf>

(3) see http://www.acea.be/index.php/news/news_detail/acea_biofuel_statement/

Unfortunately, the European Parliament agreement also permits Member States to market diesel with a FAME content greater than 7%. In other words, the European Parliament has agreed to an unlimited FAME content in diesel.

For the automobile industry, this is a crazy situation. It means that different Member States can have different diesel quality in their territory without any standardisation. This bypasses the whole idea of having a single European standard in the internal market. Consumers need to have access to a consistent fuel quality across the EU. The position of ACEA⁽³⁾ is that we do not accept the use of diesel with more than 7% FAME in our vehicles due to valid technical reasons.

ACEA calls on the co-legislators and the Commission to urgently review this decision to ensure that the Fuel Quality Directive limits the FAME content in diesel to 7% maximum in all Member States so that consumers can purchase diesel fuel that is fit for purpose.

ACEA supports higher bio-energy content fuel blends but with standardisation of diesel fuel quality across the EU and only if the bio-energy fraction is manufactured from hydrogenated vegetable oils or via second generation biofuels. These processes result in renewable diesel blends having good vehicle compatibility.

(c) Uniform labelling of petrol and diesel at the pump:

ACEA is very concerned by the weak language that has been agreed by the Parliament concerning information to consumers regarding the biofuel content of both petrol and diesel.

The following words are used:

In the case of petrol – “[Member States] shall ensure the provision of appropriate information to consumers concerning the biofuel content of petrol and, in particular, on the appropriate use of different blends of petrol”.

In the case of diesel – “Member States shall ensure the provision of appropriate information to consumers concerning the biofuel content of diesel fuel, in particular FAME”.

ACEA is very concerned with this text since it avoids specific labelling of the filling station pump. There is no definition of “appropriate information” which means that these statements could be merely complied with by a government or oil company leaflet or a simple note on an obscure website. ACEA views this as totally insufficient for the consumer to know what fuel he should be putting into his vehicle, old or new.

The ACEA position on biofuels⁽³⁾ is that there should be distinct labelling of E10 (biofuel petrol containing up to 10% ethanol) in order to avoid customer confusion and to ensure that E10 is used in the vehicles for which it is suitable. ACEA has committed to do its part by advising consumers which vehicles should continue to be operated on today’s EN228 petrol (maximum 5% ethanol). Labelling of the filling station pumps dispensing E10 is definitely needed for consumers.

The same applies to diesel blended with FAME. Again, the ACEA biofuels statement says that all new diesel vehicles will be B7 (i.e. maximum 7% FAME content) compatible from 2010. As noted above in point (b), the Parliament agreement means that Member States may place on the market diesel with a FAME content greater than 7%.

It is absolutely essential that diesel pumps at the filling station are properly labelled with their FAME content. Again, words such as ‘appropriate information’ are simply not good enough for the consumer.

A uniform labelling of petrol and diesel referring to EN228 and EN590 respectively, across the EU27 is urgently requested to avoid customer confusion during cross-border traffic and when biofuel blends are used.

(d) Ethanol vapour pressure waiver:

The Parliament agreement permits Member States to request a derogation against meeting the summer period maximum vapour pressure limit of 60kPa for fuels containing bio-ethanol.

Although the conditions necessary to support a Member States' request for a derogation are laid down in the report adopted by the European Parliament, ACEA finds this completely unnecessary, especially when the European oil industry (EUROPIA) publically stated that all companies can meet the 60kPa limit without any need for a waiver. Derogations will result in an increase in hydrocarbon emissions in the summer period which the Commission must act against.

ACEA trusts that the Commission will apply the most rigorous conditions in their assessment of any request for derogation and subsequently determine that the case for any waiver is unnecessary. Again, any derogation so granted will mean different fuel quality across the EU. This is not acceptable to ACEA.

(e) Petrol oxygenates content:

The increase in the maximum ethanol content for petrol to a maximum of 10% was agreed by ACEA. However, ACEA does not agree with the increase in the other oxygenates mentioned in the E10 petrol specification, especially as they are not even bio-oxygenates. ACEA remains concerned that these levels of oxygenates (they are higher than the oxygenate specifications for today's petrol) will result in some compatibility issues with the materials of vehicle fuelling systems. Vehicle driveability is also expected to be a concern. Vehicle manufacturers do not accept responsibility in cases of deterioration or failure using petrol with these levels of oxygenates.