



L'Avenue de la Commune, St Peter, Jersey, JE3 7ZR

Connétable Mike Jackson  
Chair of the Environment, Housing and Infrastructure Scrutiny Panel  
Pennine Way  
Route Orange  
St. Brelade  
Jersey  
JE3 8GQ  
[M.Jackson2@gov.je](mailto:M.Jackson2@gov.je)

Dear Chairman,

I am writing on behalf of ATF regarding the Scrutiny review of the Carbon Neutral Roadmap. We very much welcome the opportunity to share our insights and we would greatly appreciate the opportunity to discuss these in person as part of your review.

We are a leading fuel distribution company in the Channel Islands, supplying domestic, commercial, and retail fuels. In addition, we operate in specialist sectors, providing aviation storage and refuelling at Jersey Airport.

We support the overall aims of the Carbon Neutral Roadmap. It is vital every part of society plays their part to address climate change and lead us to a carbon neutral future. Of course, as the report rightly points out, many of these proposals are complex requiring investment of resources and time and will impact other elements of the economy. The overriding aim is always how can we achieve the biggest cut in carbon emissions for the lowest cost.

This is one of the most important issues facing the island and indeed the whole planet. ATF has, and will continue to be, a strong supporter of effective and evidenced-based approaches to reducing carbon emissions and addressing climate change.

As a starting point please kindly find attached ATF's submissions to the Climate Conversation (dated 11/03/21) and Carbon Neutral Roadmap (dated 27/01/2022) which we hope that you will find helpful. You will note from our submission, we believe the Government of Jersey (GoJ) has a number of proposals that are worthy of urgent consideration as they can help Jersey not only achieve the goal of a carbon neutral future but also allow immediate action in achieving this.

At the same time providing a potential solution which offers best-value from the valuable contribution that GoJ has asked all drivers to pay in road fuel duty. Moreover, one that can avoid unintended consequences, which could otherwise undermine the path to a carbon neutral Jersey.

Indeed, in March 2021, as part of our submission to the 'Climate Conversation', we set-out a proposal whereby Jersey could introduce a mandatory requirement that all road fuel sold in the island should contain a minimum level of renewable fuels, Ethanol in petrol and FAME in diesel (10% Ethanol in petrol known as E10 and 7% FAME in diesel, known as B7). Our analysis shows that this would make an important and valuable contribution to reducing Jersey's carbon emissions. Since we made that submission, you may be aware that the UK has legislated for E10.

We were disappointed that our proposal this was not included in the final report. However, the evidence of other jurisdictions clearly shows that Jersey can still and should seize the opportunity



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presented by the introduction of E10 and B7. We believe that this would lead to both an immediate and long-term reduction in carbon emissions. In relation to the proposals contained in the roadmap, specifically TR3, we believe a more effective approach would be to focus spending on supporting a transition to a greener public transport fleet.

On that basis, we believe that TR3 could be repurposed to ensure an even greater reach and effectiveness. Currently, the proposal calls for spending approx. £2.9 million to subsidise 9 million litres of second-generation diesel.

Petrol is the majority fuel used on the island for domestic transport. It is worth noting that petrol accounts for 57% of the road fuels used on Island, with diesel making up the remaining 43%. Therefore, to be effective the Carbon Neutral Roadmap must include petrol as well as diesel. Proceeding without a policy for Petrol, means ignoring the huge potential to reduce Carbon Emissions from the dominant fuel type.

In 2008, the UK Government introduced the Renewable Transport Fuel Obligation (RTFO), as the main policy tool, with the aim of reducing greenhouse gas emissions (CHG) from road transport fuels. More recently, this has also been extended to include non-road mobile machinery (NRMM). All fuels have an obligation to contain a 'bio-element' in the UK. In the case of petrol, ethanol is blended with the fuel and in the case of Diesel, FAME.

Under current legislation UK fuel distributors are required to sell fuels that contain a bio element of 10% Ethanol in Petrol and 7% FAME in Diesel. The main benefit of these fuels is that they reduce overall levels of CO<sub>2</sub> emissions, by blending the fuel, less fossil fuel is required, helping protect the environment and meeting climate change targets. A litre of pure ethanol also produces about two thirds of the carbon emissions compared to a litre of ordinary petrol<sup>1</sup>. In fact, the UK government has stated that *"The introduction of E10 petrol at UK forecourts could cut transport CO<sub>2</sub> emissions by 750,000 tonnes a year – the equivalent of taking 350,000 cars off the road, or all the cars in North Yorkshire.*

When applied to Jersey, we believe this would equate to 6,841 cars.

## What is E10?

- E10 is a petrol grade that contains up to 10% renewable ethanol in volume, made from biomass feedstock such as crops, wastes and residues
- E10 is the European test fuel for type approval fuel consumption and emission testing of petrol cars. It is currently available widely at petrol pumps in UK, Belgium, Bulgaria, Finland, France, Germany, Luxembourg

## Why use E10?

- Renewable ethanol reduces greenhouse gas emissions – more than 70% on average compared to fossil fuels such as petrol. The more ethanol blended in, the better the results.

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<sup>1</sup> <https://www.transportenergystrategies.com/2020/03/25/why-raising-the-alcohol-content-of-europes-fuels-could-reduce-carbon-emissions/>

<sup>2</sup> <https://www.gov.uk/guidance/e10-petrol-explained>



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Widespread adoption of E10 across Europe will boost the EU's ability to meet its targets for transport decarbonisation and renewable energy incorporation

- Ethanol can also have benefits for engine performance. It boosts the octane rating when blended with petrol, allowing the development of more efficient engines. While drivers may notice a slight increase (1-2%) in fuel consumption with the addition of ethanol to petrol, this is minor compared to other factors such as vehicle maintenance or driving style
- Adoption of E10 delivers immediate climate-change mitigation with little to no change in transport infrastructure: it can be used in today's cars and dispensed from most of today's pumps and fuel stations. The vast majority of cars built after the year 2000 are compatible with E10 and there is no need to adapt vehicles to obtain instant benefits. Nearly all of the petrol cars in Europe today could run on E10 – helping deliver greater emissions reduction now
- Because renewable EU ethanol is made from European feedstock, E10 offers a distinctly domestic solution to diversifying our energy mix and reducing our reliance on imported crude oil
- Ethanol blends (E10/E20/E85) are among the most effective tools for decarbonisation thanks to their very low carbon abatement costs

### **E10 success stories in France, Finland, Belgium**

- In France, E10 was introduced in 2009 in addition to 95-E5 and 98-E5 and is the main petrol grade sold at the pump – 42.7% of the petrol market in September 2018
- In Finland, E10 was introduced in 2011 to replace 95- E5 and reached a petrol market share of 68% in 2017
- In Belgium, E10 was introduced in 2017 to replace 95-E5, reaching a petrol market share of 78.5% at the end of the year 2017

### **Ethanol uptake around the world**

- UK since 2021
- Brazil: Since 2015, the minimum ethanol content has been set at 27% (E27). Lower ethanol blends do not exist in Brazil
- US: In 2017, the average ethanol content of petrol was 10.07%. The US administration is now moving toward year-round sales of E15
- China intends to introduce a nationwide E10 mandate
- India decided in 2017 on the implementation of an E10 mandate by 2022
- Argentina has an E12 mandate



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- Canada has a minimum federal mandate of 5% ethanol in petrol, up to 10% in certain provinces<sup>17</sup>
- The Philippines intends to move to E20 in 2020
- Thailand distributes E10 and E20

These are just an overview of our comments and proposals which are contained in our submission and we would welcome the opportunity to discuss.

Kind regards,

Jonathan Best  
Director