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TO: [biofuels@dews.qld.gov.au](mailto:biofuels@dews.qld.gov.au)

TO: Project Manager – Queensland biofuel mandate

Reference: Towards a clean energy economy: achieving a biofuel mandate for Queensland – Discussion paper 2015

### **Opinion about biofuel mandate for Queensland**

First of all, a lot of thanks to for Queensland Government for organising this important consultation.

This opinion represents an opinion of an individual citizen, not any legal entity.

This opinion does not contain:

- any business secrets
- any trade secrets
- any confidential information.

This opinion is public.

The PDF file of this opinion can be added to a relevant web page.

Annex 1 holds information about previous consultations related to information systems.  
Annex 2 holds information about disclaimers and copyright.

Best Regards,

Jukka S. Rannila  
citizen of Finland

signed electronically

[Continues on the next page]

41

**42 Previous opinion addressed to Australian public sector communities**

43

44 Previous opinions for Australian public sector communities are following:

45

46 First two opinions are related to information systems.

47

48 EN: Opinion 54: Government Content Management System

49 [http://www.jukkarannila.fi/lausunnot.html#nro\\_54](http://www.jukkarannila.fi/lausunnot.html#nro_54)

50

51 EN: Opinion 56: National Identity Proofing Guidelines

52 [http://www.jukkarannila.fi/lausunnot.html#nro\\_56](http://www.jukkarannila.fi/lausunnot.html#nro_56)

53

54 I have also constructed an opinion about procurement rules.

55

56 EN: Opinion 57: Updating the Commonwealth Procurement Rule

57 [http://www.jukkarannila.fi/lausunnot.html#nro\\_57](http://www.jukkarannila.fi/lausunnot.html#nro_57)

58

**59 The Finnish context**

60

61 In Finland we have a published bioeconomy strategy.

62

63 Finnish Bioeconomy portal

64 <http://www.biotalous.fi/?lang=en>

65

66 Finnish bioeconomy strategy

67 <http://www.biotalous.fi/facts-and-contacts/finnish-bioeconomy-strategy/?lang=en>

68

69 The current government (Sipilä) published government program on 27 May 2015.

70

71 Programme of Prime Minister Sipilä's Government

72 <http://valtioneuvosto.fi/en/sipila/government-programme>

73

74 Chapter 7 of that program is dedicated to bioeconomy and clean solutions.

75

76 Real and concrete policies for bioeconomy by the current government (Sipilä) can be implemented  
77 in the near future (After 27 May 2015).

78

**79 The Queensland case in specific – achieving a biofuel mandate for Queensland?**

80

81 Here can be concluded that this consultation organised by the Department of Energy and Water  
82 Supply (Queensland Government) is more concrete than general strategy paper. Possibly we can  
83 learn something here in Finland based on this Queensland consultation.

84

**85 The Finnish case**

86  
87 Here we can note the page for E10 petrol on the market in Finland.

88  
89 E10 Petrol on the Market in Finland  
90 <http://www.e10bensini.fi/en>

91  
92 From the web page we can note that since January 2011 there has been E10 petrol on the Finnish  
93 market.

94  
95 **Legislation with European Union – implemented nationally**

96  
97 Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on  
98 the promotion of the use of energy from renewable sources and amending and subsequently  
99 repealing Directives 2001/77/EC and 2003/30/EC (Text with EEA relevance)

100  
101 [http://eur-lex.europa.eu/legal-content/EN/TXT/?](http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32009L0028&qid=1434272602442)  
102 [uri=CELEX:32009L0028&qid=1434272602442](http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32009L0028&qid=1434272602442)

103  
104 The European Commission has a page for renewable energy:

105 <https://ec.europa.eu/energy/en/topics/renewable-energy>  
106 This page leads to several issues mentioned on the directive 2009/28/EC text

107  
108 Interestingly progress reports from the member states (EU) are published only in every **two years** –  
109 not in yearly basis. Also the European Commission publish reports every two years.

110  
111 **This opinion is mainly about reporting (requirements)**

112  
113 There is three questions on the consultation document:

- 114  
115 **10. Is this level of detail appropriate for liable entities?**  
116 **11. Is there any other data or information that should be requested in the quarterly**  
117 **reports?**  
118 **12. Can this information and data be used in other ways to support industry?**

119  
120 **Reporting duties / Queensland?**

121  
122 It can be said that proposed quarterly reports are different when compared to the European Union.

123  
124 It can be noted that European Union has currently 28 member states and over 500 000 000 citizens.  
125 There are unique situations in the member states (EU) and yearly/monthly/etc. reporting from 28  
126 member states mean a lot work for different stakeholders.

127  
128 Queensland is a smaller government entity which means that it is easier to organise different  
129 reporting responsibilities for different (smaller) entities.

130

131 **Opinion: Since Queensland is a smaller governmental entity it can be possible for**  
132 **different stakeholders provide quarterly reports.**

133  
134 **Using web feeds extensively?**

135  
136 I have advocated usage of <sup>1</sup> web feeds (RSS and/or Atom) on many previous opinion documents. To  
137 be precise, there are some standards for web feeds: RSS 2.0 <sup>2</sup> standard and Atom <sup>3 4</sup> standards. There  
138 is also a list of RSS feed aggregators on <sup>5</sup> Wikipedia. There are different systems, which comply  
139 with these example standards (RSS and Atom) differently.



141  
142  
143 **Proposal: Web feeds (RSS and/or Atom) could be used extensively for providing (real-**  
144 **time) information for different stakeholder(s) (communities).**

145  
146 **Proposal: There could be different web feeds (RSS and/or Atom) for different**  
147 **stakeholder(s) – having just one web feed (RSS and/or Atom) may not be a feasible**  
148 **solution.**

149  
150 It can be said that web feeds can provide *real-time information* in some cases.

151  
152 **Opinion: There can be possibilities to provide real-time information – possibilities**  
153 **depend on the unique situation in Queensland!**

154  
155 **Proposal: The possibilities for providing real-time information could be assessed**  
156 **together with different stakeholders.**

157  
158 **Layered information systems?**

159  
160 Like said before there is a unique situation in Queensland and there can several information systems  
161 in different stakeholder communities.

162  
163 Generally speaking we can conclude that there are already different information systems inside and  
164 outside of different stakeholder communities.

165  
166 It is always possible that between different information systems there are no connections (0).

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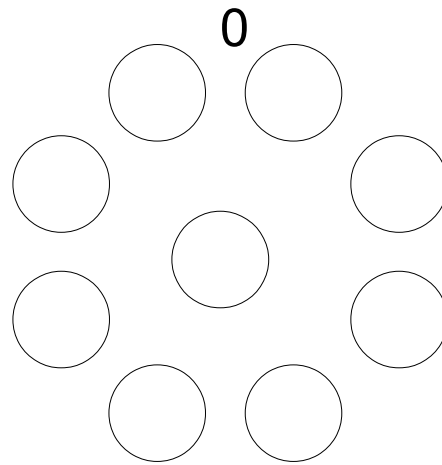
1 [https://en.wikipedia.org/wiki/Web\\_feed](https://en.wikipedia.org/wiki/Web_feed), Web feed – Wikipedia article

2 <http://www.rssboard.org/rss-specification>, RSS 2.0 specification

3 <http://tools.ietf.org/html/rfc4287>, The Atom Syndication Format

4 <http://tools.ietf.org/html/rfc5023>, The Atom Publishing Protocol

5 [https://en.wikipedia.org/wiki/Comparison\\_of\\_feed\\_aggregators](https://en.wikipedia.org/wiki/Comparison_of_feed_aggregators), Comparison of feed aggregators



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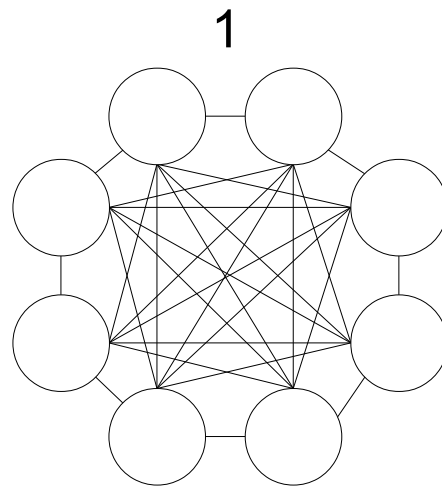
168

169 Here we can note that this situation (0) is rare since there are already several information systems  
170 which have several connections with other information systems.

171

172 In many cases different systems are joined together gradually since more and more new  
173 information systems are presented.

174



**Complex many-to-many connections**

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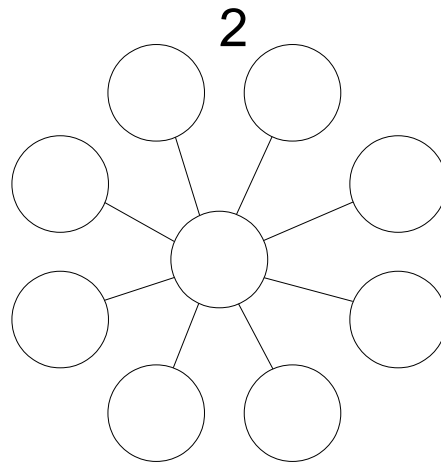
177

178 Generally speaking these many-to-many connections can work quite well when there are not  
179 changes in different systems. The problem arises when there are changes in one system since one  
180 change can affect several other systems.

181

182 Based on these problems there can different efforts to have less complex many-to-many  
183 connections. Then there can be one central system which have connections to all other systems.

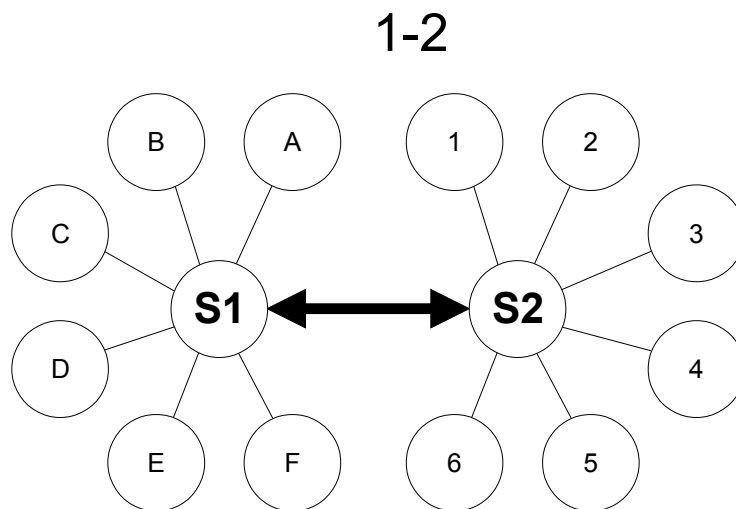
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**Simple one-to-many connection**

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The problem with this solution is that all systems are depending on just one system. Problems in the central system can cause serious problems in all other systems.

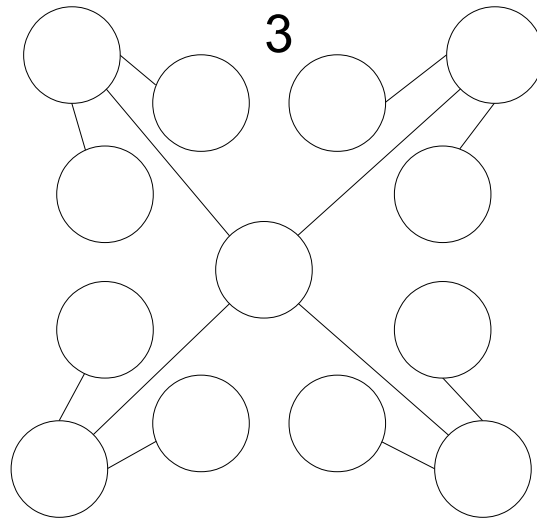


**Cooperation between two central systems**

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Then there can some efforts to have cooperation between different central system. This could mean that not all systems are not depending on just one system.

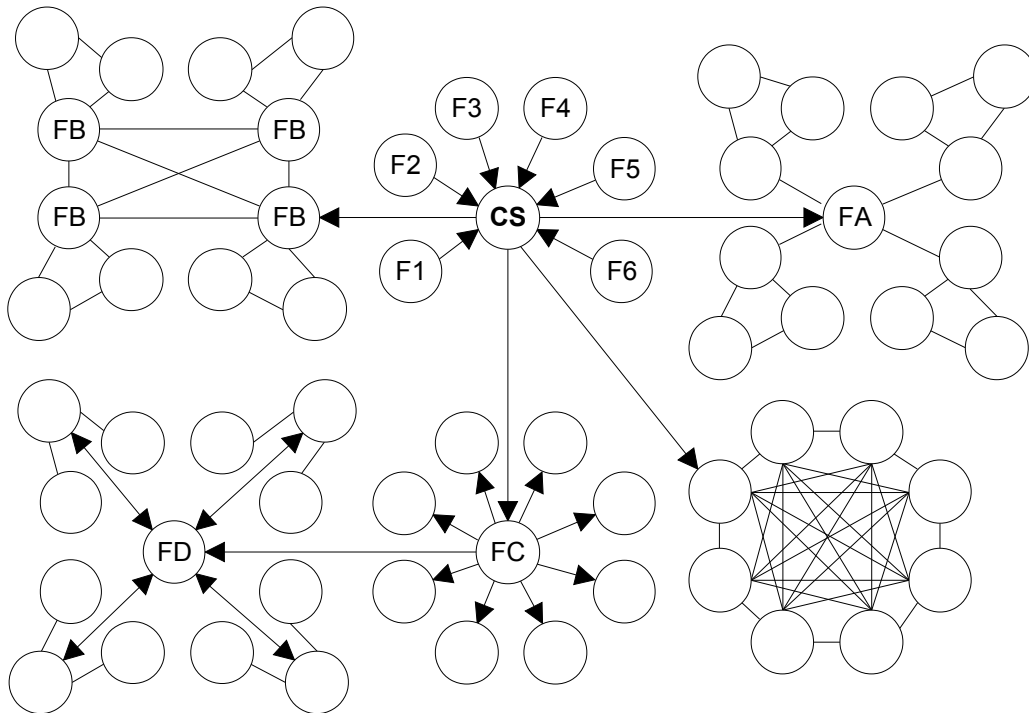
The next option is to have different hierarchies between systems. In this way there are some subsystems which then are connected to other subsystems.



**Hierarchical systems**

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**Adding more complexity**

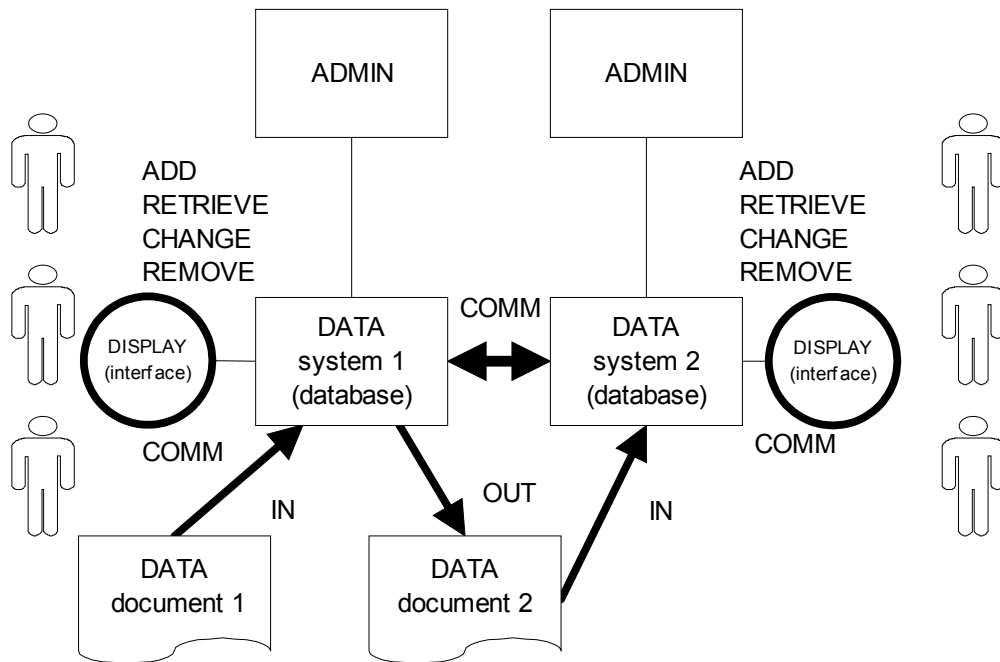


**Different systems are layered – usage of standards/formats**

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Here we can note that different information systems are layered. Here we can note that there can be different formats/standards which are used in layered information systems.

**Basic usage of a system?**



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Here we can note some general issues with information systems. Generally speaking there can be direct system-to-system connections. Generally speaking cooperation between systems are based on transmitting different documents to different systems.

**Note:** There may be a need for both solutions – direct system-to-system connections and transmitting different documents between systems.

**Proposal:** Probably there has to both options implemented – direct system-to-system connections and transmitting different documents between systems.

**Proposal:** There could be a need for technically oriented consultation(s) based on the results of this consultation.

**Concepts in different information systems**

Following concepts are mentioned on the consultation document:

- petrol and petrol-ethanol blend
- regular petrol
- regular petrol-ethanol blend
- premium petrol-ethanol blend
- sustainable ethanol in the petrol-ethanol blend sold in the quarter
- diesel and diesel-biodiesel blend
- diesel-biodiesel blend
- sustainable biodiesel in the diesel-biodiesel blend sold in the quarter.



238 I have advocated following order for developing information systems.

- 239
- 240 1) Trying to understand the concepts in the application field/domain.
  - 241 2) Gathering different concepts together.
  - 242 3) Generating different interface proposal together
  - 243 4) Creating first very simple interfaces for the experts users of a system
  - 244 5) Creating more modified interfaces for other stakeholder groups.
- 245

246 **Proposal: There could be a consultation for understanding the concepts on this**  
 247 **field/domain, i.e. biofuel mandate.**

248

249 **Note: On some previous opinions (e.g. European Union) I have explicated different**  
 250 **concepts to different fields/domains.**

251

252 **Note: Possibly this consultation gives us a good understanding of concepts on this**  
 253 **field/domain, i.e. biofuel mandate.**

254

255 **Note: It takes some time and efforts to actually understand all concepts on some**  
 256 **field/domain.**

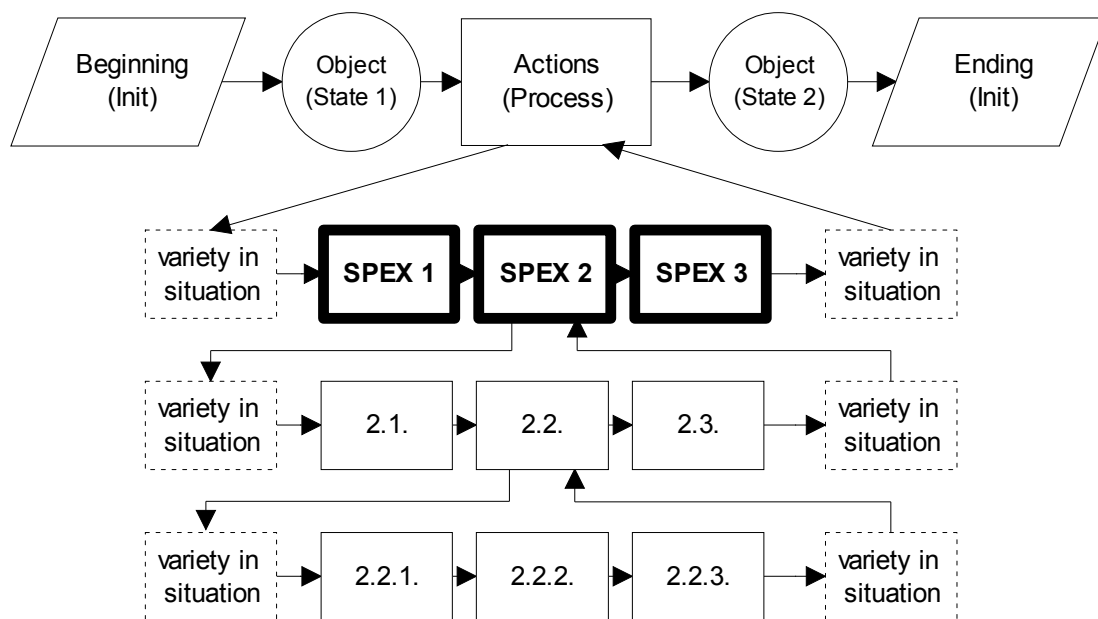
257

258 **Actually specifying some thing (SPEX) / Processes**

259

260 Previously I have mentioned concepts and interfaces. It is always possible to model processes for  
 261 different information systems.

262



263

264

265 Here we can note that processes can be modelled in different levels. Then it could be possible to

266 decide which parts of the process (SPEX) are done with computers and what can be more traditional  
 267 (SPEX) interfaces – e.g. paper-based forms.

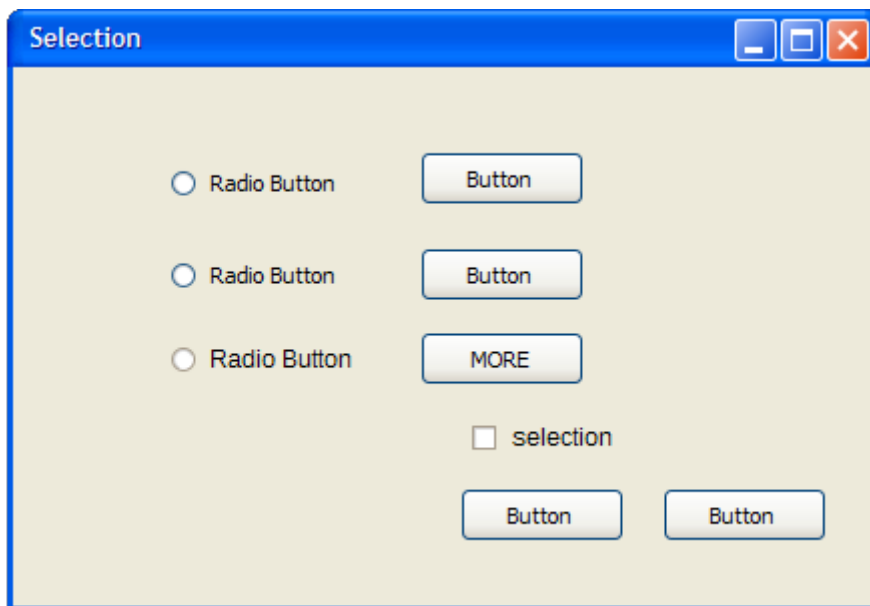
268

269 **Proposal: Different processes between different stakeholder groups can be modelled.**

270

271 **Proposal: After modelling concepts there can be more reasoned decision for computer-  
 272 based interfaces (SPEX) and traditional interfaces (SPEX).**

273



274

275 **An example of an interface: done with Pencil (by Evolus)**

276

277 **Proposal: Different traditional interfaces (SPEX) could be explicated first – e.g. paper-  
 278 bases forms.**

279

280 **Proposal: After explicating traditional interfaces (SPEX) there can be some modelling  
 281 work for user interfaces.**

282

283 After modelling traditional user interfaces (e.g. paper-based forms) it could be possible to have all  
 284 relevant concepts explicated. After explicating different concepts it can be possible to model user  
 285 interfaces based on different concepts.

286

287 Nowadays we have different tools for describing / modelling different user interfaces. I have  
 288 browsed web pages of some user interfaces developing tools. One promising tool is <sup>6</sup> Pencil (by  
 289 Evolus). With that kind tool it could be possible to model different user interfaces.

290

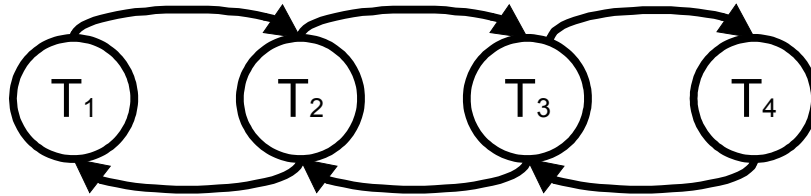
291 I have proposed following order for modelling user interfaces:

292

- 293 1) Simple and powerful user interfaces for *expert users* should be modelled first.
- 294 2) Next user interface could be for daily user.

6 <http://pencil.evolus.vn>, open-source GUI prototyping tool (Pencil by Evolus)

- 295 3) Next user interface could be for weekly users.  
 296 4) Next user interface could be for monthly users.  
 297 5) Etc. can be developed gradually.  
 298



299  
 300  
 301 Different expert users need shortcuts to everything and their interfaces can be very simple. People  
 302 learn and forget ( $T_n \leftrightarrow T_n$ ) different issues when using systems and therefore it should be possible to  
 303 move between different interfaces. It should be possible to become an expert user ( $T_1, T_2, T_3, T_4$ )  
 304 after some learning processes.

305  
 306 **Proposal: Different user interfaces for expert users could be modelled first.**

307  
 308 **Proposal: More complex user interfaces could be modelled after modelling user**  
 309 **interfaces for expert users.**

310  
 311 Generally speaking we tend to create interfaces which are not valued by expert users. Expert users  
 312 need shortcuts to everything. It can be also said that users learn different issues gradually and  
 313 therefore there can be different interfaces based on learning processes of different users.

314  
 315 Depending on time ( $T_1, T_2, T_3, T_4, T_n$ ) user learn and forget different features ( $T_n \leftrightarrow T_n$ ) of a specific  
 316 system. Therefore there can be different shortcuts and even different interfaces for different  
 317 stakeholders. Like said expert users demand very simple and powerful interfaces.

318  
 319 **Proposal: There could be a consultation for gathering interface proposals from**  
 320 **different stakeholders (communities).**

321  
 322 **What can we learn based on this (Queensland) consultation (e.g. in Finland)?**

323  
 324 From the Finnish viewpoint it can be said that this consultation was rather specific – biofuel  
 325 mandate. From the web pages (Finnish bioeconomy portal) I did not find information about  
 326 rigorous reporting regulations for reporting different information about biofuel.

327  
 328 It can be noted that reports about biofuel issues should be developed also in Finland.

329  
 330 We should organise here in Finland a similar consultation, cf. Queensland.

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## ANNEX 1

I have constructed different opinions about different issues, and on the following web page are all written (PDF files) opinions:

<http://www.jukkarannila.fi/lausunnot.html>

**I have constructed specifically opinions related to information systems – both in English and in Finnish.**

**Here is the list of opinions related to information systems.**

EN: Opinion 8: European Interoperability Framework, version 2, draft

[http://www.jukkarannila.fi/lausunnot.html#nro\\_8](http://www.jukkarannila.fi/lausunnot.html#nro_8)

EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS proposal for comments

[http://www.jukkarannila.fi/lausunnot.html#nro\\_9](http://www.jukkarannila.fi/lausunnot.html#nro_9)

EN: Opinion 13: Final Committee Draft ISO/IEC FCD3 19763-2

[http://www.jukkarannila.fi/lausunnot.html#nro\\_13](http://www.jukkarannila.fi/lausunnot.html#nro_13)

EN: Opinion 14: SFS discussion paper / SFS:n keskusteluasiakirja

[http://www.jukkarannila.fi/lausunnot.html#nro\\_14](http://www.jukkarannila.fi/lausunnot.html#nro_14)

EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530

[http://www.jukkarannila.fi/lausunnot.html#nro\\_17](http://www.jukkarannila.fi/lausunnot.html#nro_17)

EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft

[http://www.jukkarannila.fi/lausunnot.html#nro\\_18](http://www.jukkarannila.fi/lausunnot.html#nro_18)

EN: Opinion 19: Official Acknowledgement by the Commission

[http://www.jukkarannila.fi/lausunnot.html#nro\\_19](http://www.jukkarannila.fi/lausunnot.html#nro_19)

EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft

[http://www.jukkarannila.fi/lausunnot.html#nro\\_20](http://www.jukkarannila.fi/lausunnot.html#nro_20)

EN: Opinion 21: Opinion about the European Interoperability Strategy proposal

[http://www.jukkarannila.fi/lausunnot.html#nro\\_21](http://www.jukkarannila.fi/lausunnot.html#nro_21)

EN: Opinion 23: Public consultation on the review of the European Standardisation System

[http://www.jukkarannila.fi/lausunnot.html#nro\\_23](http://www.jukkarannila.fi/lausunnot.html#nro_23)

- 376 EN: Opinion 24: ISO/IEC JTC 1 / SC 34 / WGs 1, 4 and 5 in Helsinki 14-17 June 2010  
377 [http://www.jukkarannila.fi/lausunnot.html#nro\\_24](http://www.jukkarannila.fi/lausunnot.html#nro_24)  
378
- 379 FI: Lausunto 29: Avoimen demokratian avoimen datan avaamisen detaljit (ADADAD)  
380 [http://www.jukkarannila.fi/lausunnot.html#nro\\_29](http://www.jukkarannila.fi/lausunnot.html#nro_29)  
381
- 382 EN: Opinion 30: Internet Filtering  
383 [http://www.jukkarannila.fi/lausunnot.html#nro\\_30](http://www.jukkarannila.fi/lausunnot.html#nro_30)  
384
- 385 FI: Lausunto 31: Terveystieteiden tietotekniikasta  
386 [http://www.jukkarannila.fi/lausunnot.html#nro\\_31](http://www.jukkarannila.fi/lausunnot.html#nro_31)  
387
- 388 EN: Opinion 32: COMP/C-3/39.692/IBM - Maintenance services  
389 [http://www.jukkarannila.fi/lausunnot.html#nro\\_32](http://www.jukkarannila.fi/lausunnot.html#nro_32)  
390
- 391 FI: Lausunto 33: Julkishallinnon tietoluovutusten periaatteet ja käytännöt  
392 [http://www.jukkarannila.fi/lausunnot.html#nro\\_33](http://www.jukkarannila.fi/lausunnot.html#nro_33)  
393
- 394 EN: Opinion 34: REMIT Registration Format  
395 [http://www.jukkarannila.fi/lausunnot.html#nro\\_34](http://www.jukkarannila.fi/lausunnot.html#nro_34)  
396
- 397 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes  
398 [http://www.jukkarannila.fi/lausunnot.html#nro\\_37](http://www.jukkarannila.fi/lausunnot.html#nro_37)  
399
- 400 FI: Lausunto 38: SADe-ohjelman avoimen lähdekoodin toimintamallin luonnos  
401 [http://www.jukkarannila.fi/lausunnot.html#nro\\_38](http://www.jukkarannila.fi/lausunnot.html#nro_38)  
402
- 403 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems  
404 [http://www.jukkarannila.fi/lausunnot.html#nro\\_39](http://www.jukkarannila.fi/lausunnot.html#nro_39)  
405
- 406 EN: Opinion 41: AT.39398: observations on the proposed commitments  
407 [http://www.jukkarannila.fi/lausunnot.html#nro\\_41](http://www.jukkarannila.fi/lausunnot.html#nro_41)  
408
- 409 EN: Opinion 43: Publication of extracts of the European register of market participants  
410 [http://www.jukkarannila.fi/lausunnot.html#nro\\_43](http://www.jukkarannila.fi/lausunnot.html#nro_43)  
411
- 412 EN: Opinion 45: About ICT standardisation  
413 [http://www.jukkarannila.fi/lausunnot.html#nro\\_45](http://www.jukkarannila.fi/lausunnot.html#nro_45)  
414
- 415 EN: Opinion 46: Review of the EU copyright rules  
416 [http://www.jukkarannila.fi/lausunnot.html#nro\\_46](http://www.jukkarannila.fi/lausunnot.html#nro_46)  
417
- 418 EN: Opinion 47: Sharing or collaborating with government documents  
419 [http://www.jukkarannila.fi/lausunnot.html#nro\\_47](http://www.jukkarannila.fi/lausunnot.html#nro_47)  
420

- 421 FI: Lausunto 49: JSH 166 -suosituksen päivitys  
422 [http://www.jukkarannila.fi/lausunnot.html#nro\\_49](http://www.jukkarannila.fi/lausunnot.html#nro_49)  
423
- 424 EN: Opinion 52: Trusted Cloud Europe Survey  
425 [http://www.jukkarannila.fi/lausunnot.html#nro\\_52](http://www.jukkarannila.fi/lausunnot.html#nro_52)  
426
- 427 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)  
428 [http://www.jukkarannila.fi/lausunnot.html#nro\\_53](http://www.jukkarannila.fi/lausunnot.html#nro_53)  
429
- 430 EN: Opinion 54: Government Content Management System  
431 [http://www.jukkarannila.fi/lausunnot.html#nro\\_54](http://www.jukkarannila.fi/lausunnot.html#nro_54)  
432
- 433 EN: Opinion 55: European Energy Regulation  
434 [http://www.jukkarannila.fi/lausunnot.html#nro\\_55](http://www.jukkarannila.fi/lausunnot.html#nro_55)  
435
- 436 EN: Opinion 56: National Identity Proofing Guidelines  
437 [http://www.jukkarannila.fi/lausunnot.html#nro\\_56](http://www.jukkarannila.fi/lausunnot.html#nro_56)  
438
- 439 FI: Lausunto 58: Puoluekokousaloitteet / 2010 ja 2014  
440 [http://www.jukkarannila.fi/lausunnot.html#nro\\_58](http://www.jukkarannila.fi/lausunnot.html#nro_58)  
441
- 442 EN: Opinion 59: Green paper on mobile Health  
443 [http://www.jukkarannila.fi/lausunnot.html#nro\\_59](http://www.jukkarannila.fi/lausunnot.html#nro_59)  
444
- 445 EN: Opinion 60: Cross-border inheritance tax problems within the EU  
446 [http://www.jukkarannila.fi/lausunnot.html#nro\\_60](http://www.jukkarannila.fi/lausunnot.html#nro_60)  
447
- 448 EN: Opinion 61: European Register of Products Containing Nanomaterials  
449 [http://www.jukkarannila.fi/lausunnot.html#nro\\_61](http://www.jukkarannila.fi/lausunnot.html#nro_61)  
450
- 451 FI: Lausunto 65: Lausuntopyyntö nettiäänestystyöryhmän väliraportista  
452 [http://www.jukkarannila.fi/lausunnot.html#nro\\_65](http://www.jukkarannila.fi/lausunnot.html#nro_65)  
453
- 454 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017  
455 [http://www.jukkarannila.fi/lausunnot.html#nro\\_66](http://www.jukkarannila.fi/lausunnot.html#nro_66)  
456
- 457 FI: Lausunto 67: Valtioneuvoston hanketiedon esiselvityksestä  
458 [http://www.jukkarannila.fi/lausunnot.html#nro\\_67](http://www.jukkarannila.fi/lausunnot.html#nro_67)  
459
- 460 EN: Opinion 68: European Network Code Stakeholder Committees  
461 [http://www.jukkarannila.fi/lausunnot.html#nro\\_68](http://www.jukkarannila.fi/lausunnot.html#nro_68)  
462
- 463 FI: Lausunto 69: Hallituksen esitys (luonnos 16.4.2015) vieraslajeista  
464 [http://www.jukkarannila.fi/lausunnot.html#nro\\_69](http://www.jukkarannila.fi/lausunnot.html#nro_69)  
465

466 EN: Opinion 70: Providing better APIs in New Zealand

467 [http://www.jukkarannila.fi/lausunnot.html#nro\\_70](http://www.jukkarannila.fi/lausunnot.html#nro_70)

468

469 EN: Opinion 71: Common Schema for the Disclosure of Inside Information

470 [http://www.jukkarannila.fi/lausunnot.html#nro\\_71](http://www.jukkarannila.fi/lausunnot.html#nro_71)

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473

474 I have constructed different opinions about different issues, and on the following web page  
475 are all written (PDF files) opinions:

476 <http://www.jukkarannila.fi/lausunnot.html>

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479 [Continues on the next page]

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7 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenge the three-party system, since three "old" parties were not traditionally as the three largest parties. The is now a "new" party as the third largest party. We all must remain being interested about this new development in Finland.