First Name	Charles
Last Name	Lee
Email Address	greendevelopment@hotmail.com
Organisation Name	GVWT Energy
Position	Australia Representative
Short Comment	Found the above questions related to Anonyminity confusing
Question 1.1: Which LCLF should be eligible under the program and why?	Green Methanol .....its cleared for use in jet engines by Engine Manufacturers and can be blended with Aviation bio-fuel
Question 1.2: Should certain types of LCLF be prioritised over others?	yes
Question 1.2a: Should LCLF suitable for particular particular sectors or uses be prioritised? For example, should sustainable aviation fuel be prioritised over renewable diesel?	yes
Question 1.2b: Should LCLF for certain sectors or uses be de-prioritised due to other viable decarbonisation pathways?	yes
Question 1.2c: What market impacts are anticipated by influencing prioritisation of particular fuel types?	faster emissions reductions
Question 2.1: Should the production credit be a fixed amount per litre of production, or a variable amount that depends on the market price of LCLF?	Can do both ? Or at least able to demonstrate between the 2 actively , at any time ? Fixed has certainty. Some of it needs to be fixed but it needs to have variability to reflect costs progressively lowering
Question 2.1a: Are there any potential benefits, risks or constraints considering the two different production credit options below?	Whichever incentivizes lower costs of production and more to be produced in Australia
Question 2.1b: What outcomes do you think can be delivered with the available funding?	The lowest cost production pathway for LCLF in the world
Question 2.1c: What type of mechanism provides the greatest investment certainty or level of bankability to projects?	Don't know and hence .....no specific opinion
Question 2.1d: How can this support be structured to prevent substantial upside to producers?	provide a direct avenue for small-scale production (renewables generation) to track households ' direct contributions to making SAF and other LCLF

Question 2.1e: How do you consider pricing for LCLF will be set over the short-medium term and longer term? Will pricing be matched to a premium on equivalent fossil fuel or price of imported LCLF or be on a carbon abatement basis?	can all the above be taken into account as part of the overall price ?
Question 2.2: To deliver the policy intent of the Program while maximising the value for taxpayers, do you agree that projects with the lowest cost should be prioritised under the Program, with the cost being measured either as per unit of LCLF produced or as per unit of carbon emissions abated?	yes , absolutely
Question 2.3: Should the production credit be linked to the quantum of LCLF produced, or the carbon emissions saving potential of the fuel?	the later option
Question 2.4: What are your views on the cost to deploy LCLF domestically compared to internationally? Is there a local premium for domestic production?	Local flights should be incentivized to use more local LCLF..... if GVWT Energy Augmented Turbines can provide the foundation in Australia for the renewables required for LCLF production , costs will be low based on the amount of renewable energy expected to be produced. More excess = more supply + lower costs at every stage. Local production and use should have a premium
Question 2.5: Should the total value of production credits be capped for each project? If yes, what should the capped amount be and why?	Yes , because after some time , they should not be needed.
Question 2.6: Should production be focused on domestic supply only or should export also be permitted? What impact could restriction have for projects or the market?	no restrictions .....make as much as possible , as low cost as possible
Question 2.7: Is there a role for combined production support with capital grants for first-of-a-kind facilities?	Yes
Question 2.8: What other types of funding or concessional finance could support LCLF projects (e.g. funding from CEFC and NRF)?	Funding from CEFC and NRF

Question 2.9: Is any other support required across the supply chain to enable domestic production of LCLF?	ESG Business support funding from Banks
Question 2.10: What lessons can Australia learn from other jurisdictions that have already implemented LCLF production support measures?	DId the support produce lower cost LCLFs ? Did households have a new outlet to generate revenue from contributing to the production of LCLFs with excess renewables ?
Question 3.1: Considering the objective below, what production pathways should be focused on or prioritised?	faster they can produce profitably , the faster they can return on investment
Question 3.1a: Should priority be given to projects that use more-established production pathways (e.g. HEFA and HVO) than nascent production pathways that may present a higher level of technology risk?	Nascent production pathways should have support
Question 3.1b: How can nascent production pathways compete with more-established production pathways (e.g. HEFA and HVO)?	Cost of renewables inputs .....USD 1 c KwH is the standard to work down from
Question 3.1c: What minimum stage of project development (and evidence) should be expected by projects under the program?	Proof of Scalability stage
Question 3.2: Should there be a minimum facility size to be eligible?	100 kW
Question 3.3: Should LCLF be required to meet a carbon intensity threshold (% carbon intensity reduction compared to fossil equivalent) to be eligible for the program? If yes, what would be a reasonable threshold, and how should that threshold be calculated and verified? If not, why not?	Yes.....no opinion on what threshold or how to be calculated , but it should be able to to insert itself into any international carbon intensity metric
Question 3.3a: If the production incentive is based on carbon emissions reduced, rather than volume of LCLF produced (see Question 2.3), is a minimum carbon intensity threshold still needed as part of the eligibility criteria?	no opinion

Question 3.3b: Should Indirect Land Use Change be included in the method for determining carbon intensity, for the purpose of the Program?	Yes
Question 3.3c: Should any feedstocks be prioritised or otherwise considered out of scope?	Regional waste feedstocks could be prioritized to spur economic activity in regions
Question 3.4: Other than carbon intensity, should any other sustainability criteria be included?	Are there any others ?
Question 3.5: Which international and domestic sustainability schemes should be allowed to verify sustainability claims?	Whichever complement what Australia is trying to achieve
Question 4.1: What are your views on the following factors affecting the merit of a proposal?	My views are if Australia can deliver on all those factors genuinely , Australia will be a world-leading LCLF production Hub
Question 4.2: Recipients under the Program will need to deliver benefits according to the Community Benefit Principles under the Future Made in Australia Act (see Appendix D of the Policy Design and Engagement Paper). How do you consider the Community Benefit Principles in relation to LCLF projects? Are there specific Community Benefit Principles that are more or less relevant?	Community Benefit includes Household benefit .....Households should be allowed to provide the renewables for LCLF production. Household could contribute significantly to Australia 's overall LCLF Production goals
Question 4.3: How will overseas policy developments interact with domestic policy settings to support projects reaching final investment decisions? For example, LCLF demand-side targets or mandates, and international frameworks such as the International Civil Aviation Organisation long-term global aspirational goal for international aviation (LTAG) of net-zero carbon emissions by 2050.	They interact via the common space occupied by the traceable and trackable emissions and carbon..The common denominator being the emissions themselves ?

Question 4.4: In addition to production support, what other measures are considered critical to achieve final investment decisions for projects? What are their key features?	Key features of useful measures would be cost of energy involved .....affects cost of renewables and supply chain .....affects investment
Question 4.5: What are the intersecting policies you expect need to be considered to unlock a domestic LCLF production industry?	The Environmental Reforms ....EBC . All of this proposed LCLF production has to happen with even less environmental impact
Question 4.6: Is there any other feedback you would like to provide that isn't covered by questions above?	The lowest cost of renewables inputs will determine how successful this industry is in Australia.

GVWT ENERGY PTE LTD

OVERVIEW

GVWT Energy Pte Ltd is a Singapore-based technology company developing advanced vertical axis wind turbines (VAWTs) optimized for urban rooftop deployment. Through our patented Guide Vane Augmentation system, our turbines deliver unmatched power density per square meter, particularly suited for low-wind, space-constrained environments common in cities.

Unlike conventional 3-blade turbines or solar PV, GVWT systems can be installed within existing wind farms and even placed under the rotor swept area of traditional turbines, enabling new capacity without additional land acquisition.

TECHNICAL INNOVATION: GUIDE VANE AUGMENTATION

GVWT's turbines utilize ambient wind harnessed through aerodynamic sails and precision guide vanes that channel and accelerate airflow toward the turbine blades. This produces a **jet-stream-like effect** that significantly enhances rotational energy – thereby enabling production of the cheapest e-fuel available.

COST ADVANTAGE

GVWT targets an electricity production cost of approximately USD 0.01 per kWh at scale.
Key drivers of cost efficiency:

- Minimal civil works; no cranes or large tower installations
- Modular design; 6–8 rooftop units can be shipped in one 40-ft container
- Transportable by standard pickup truck
- 97 percent steel construction and fully recyclable components
- Every component is replaceable, reducing lifetime O&M cost

While cost per kWh is highly competitive, the primary economic driver of GVWT projects is carbon credit generation, due to higher annual kWh output per unit of land area than alternative technologies.

ENERGY DENSITY ADVANTAGE

GVWT delivers significantly greater installed capacity per square kilometer compared to existing renewable options.

Technology	**Typical Installed Capacity Density**
Solar PV	~1 MW / km²
Conventional 3-blade wind	10–12 MW / km²
GVWT (current models)	56–216 MW / km²
GVWT (600 kW models, next phase)	Up to 400 MW / km²

This level of density enables new capacity additions **within existing wind farms,** overcoming land limitation and spacing requirements inherent to 3-blade turbines.

kWh Output Efficiency (per installed kW)

GVWT yields materially higher annual energy output due to vertical guidance of airflow and stackable configuration across multiple levels.

- Produces **four times more kWh per kW** installed compared to solar PV
- Produces **three times more kWh per kW** installed compared to 3-blade wind turbines

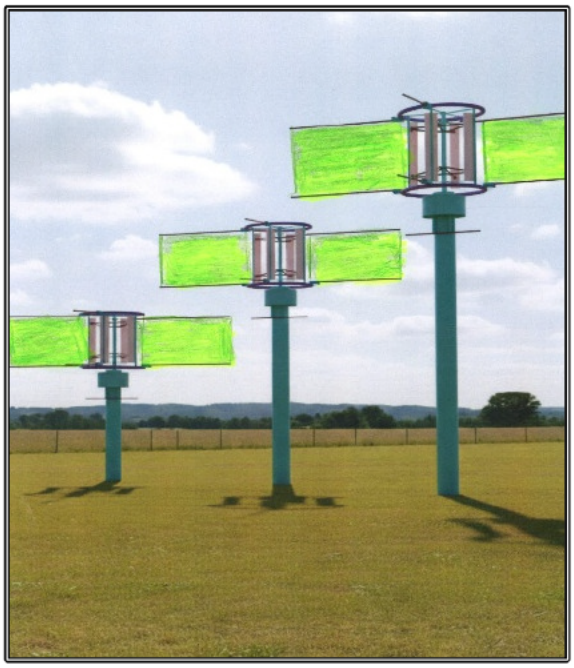
DEPLOYMENT AND VALIDATION

With commercial use certification in more than 16 countries, a **100 kW proof of scalability installation** is being constructed and will be deployed in various countries (including **Sri Lanka, Australia and Japan). Further,** power production validation and carbon credit gold-standard accreditation will be performed in conjunction with following organisations, to establish reference standards for regional adoption and multi-country rollout:

- Sri Lanka Accreditation Board
- In collaboration with the Japanese Embassy
- Under the Japan Joint Crediting Mechanism (JCM) program

LOGISTICS AND SUSTAINABILITY

- Transportable using common vehicles; rooftop series fits on pickup trucks
- Modular semi-knock-down format enables rapid assembly
- Material composition: 97 percent recycled/recyclable steel



*Note: All data presented herein are indicative estimates derived from current assumptions and may be subjected to future updates.

Design Standards of GVWT Turbine

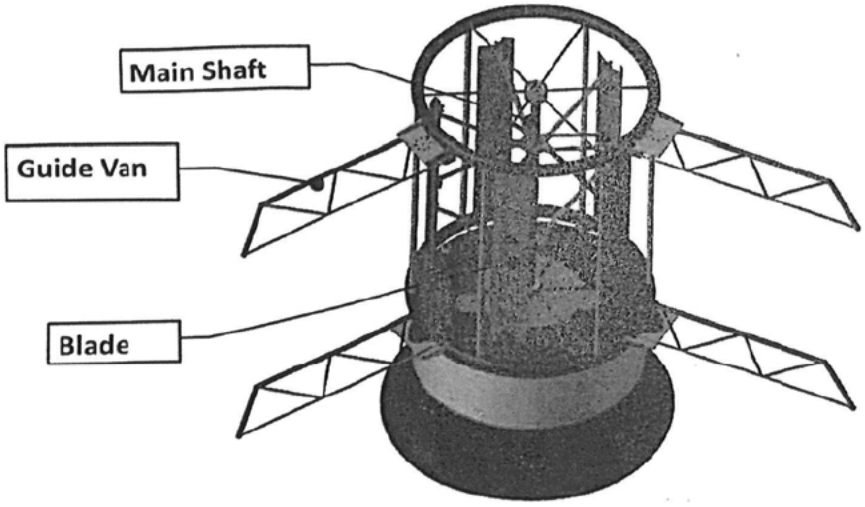
Loads Report of GVWT Energy

Singapore, 100kW augmented VAWT

According to the European design standards for micro Turbine, the main component safety factor is 1.4.

According to the relevant standards in China :GB/T 1236-2017, the main component safety factor is 1.5.

GVWT Turbine main components strength safety factor using 1.5.



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ACCREDITED CONSULTANT
for Renewable Energy Projects in Wind Power
Sri Lanka Sustainable Energy Authority
Ministry of Power and Energy

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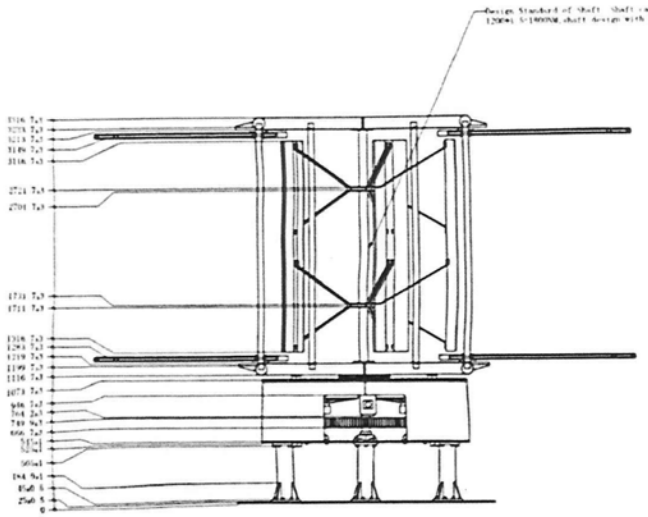
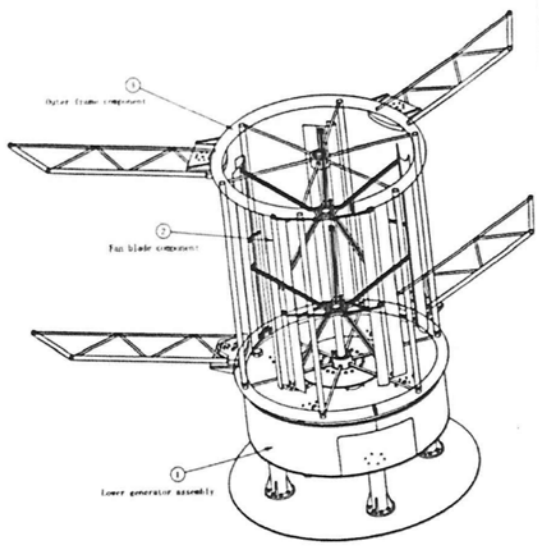
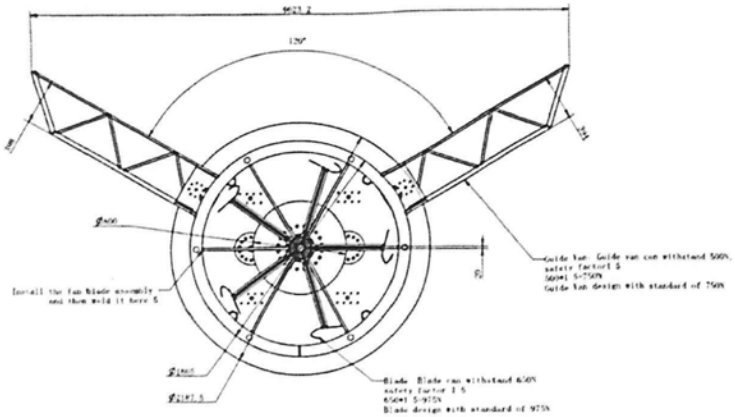
[redacted]

韩伟卫





3D-VIEW



PART NO		TYPE	NAME	MARK	MATERIAL	WEIGHT(kg)	QUANTITY	TOTAL WEIGHT
1	1	ASSEMBLY	Wind turbine power generation equipment			2499.994	1	2499.994
2	2	ASSEMBLY	Outer frame component			333.767	1	333.767
3	1	PART	Frame outer ring		Q235	127.973	2	255.946
4	1	PART	Frame external support rod		Q235	4.749	6	28.494
5	1	PART	Frame support frame		Q235	0.664	12	7.963
6	1	PART	Connect piece on the outer frame		Q235	4.759	1	4.759
7	1	PART	Connect piece under outer frame		Q235	5.576	1	5.576
8	1	ASSEMBLY	Rail installation components			13.762	4	63.046
9	1	PART	Rail installation part		Q235	13.595	1	13.595
10	1	PART	Reaction concrete plate for rail installation components		Q235	1.083	1	1.083
11	1	PART	Reaction concrete plate for rail installation components B		Q235	1.083	1	1.083
12	1	PART	Frame connection plate		Q345	35.951	1	35.951
13	1	PART	Lotus pin		and B	0.197	4	0.787
14	1	ASSEMBLY	Rail components			33.511	4	134.045
15	1	PART	Guiding rail large support pole		Q235	4.907	1	4.907
16	1	PART	Guiding rail with large and short poles		Q235	1.993	1	1.993
17	1	PART	Guiding rail small support rod		Q235	11.508	1	11.508
18	1	PART	Rail support frame 1		Q235	0.404	1	0.404
19	1	PART	Rail support frame 2		Q235	0.404	1	0.404
20	1	PART	Rail support frame 3		Q235	0.404	1	0.404
21	1	PART	Rail support frame 4		Q235	0.404	1	0.404
22	1	PART	Rail connecting seat		Q235	23.496	1	23.496
23	3	PART	Slewing bearing016.50.500		GGR15	1.641	4	6.565
24	3	PART	Hexagon headed bolt M8×40		and B	0.022	32	0.693
25	3	PART	Hexagon headed bolt M8×60		and B	0.030	32	0.945
26	2	ASSEMBLY	Fan blade components			179.927	1	179.927
27	3	PART	Fan blade shaft		Q235	38.574	1	38.574
28	3	PART	Fan blade support frame		Q235	0.750	10	7.500
29	3	PART	Fan blade support frame B		Q235	0.750	10	7.500
30	3	PART	Fan blade		Al6063-T6	16.061	5	80.303
31	3	PART	Hexagonal socket head screw M6×10		and B	0.005	160	0.862
32	3	PART	Hexagonal socket head screw M6×16		and B	0.007	80	0.538
33	3	PART	Elastic retaining ring type B for shaft 70		Al2061-T6	0.008	4	0.031
34	3	PART	Deep groove ball bearing_6314-2z		GGR15	2.763	1	2.763
35	3	PART	Self aligning roller bearing_22314		GGR15	4.347	1	4.347
36	3	PART	Power generation drive gear		SCM440	87.506	1	87.506
37	2	PART	Slewing bearing011.25.315		GGR15	44.855	1	44.855
38	2	PART	Fan motor drive support plate		Q345	172.885	1	172.885
39	2	PART	Drive motor small gear		SCM440	2.058	1	2.058
40	2	PART	Drive motor 9.256.4m8		Al2061-T6	14.904	1	14.904
41	2	PART	Generator adapter plate		Q235	22.673	2	45.345
42	2	PART	Generator Set		Q235	338.311	2	676.621
43	2	ASSEMBLY	Power generation gear			40.503	1	40.503
44	3	PART	Power generation driven gear		SCM440	29.232	2	40.503
45	2	PART	Transitional permanent force		NPTE	70.467	1	70.467
46	2	PART	Equipment support rod		45	7.676	4	30.703
47	2	PART	Casting square seat FF-214		45	5.540	1	5.540
48	2	PART	Insert bearing UEL_214-43		GGR15	2.834	1	2.834
49	2	PART	Outer spherical bearing with bearing seat UKF216		Al2061-T6	3.273	2	6.550
50	2	PART	Wind turbine generator baffle		Q345	182.139	1	182.139
51	2	PART	Generator positioning pin		and B	0.160	4	0.641
52	2	PART	Hexagon headed bolt M16×70		and B	0.149	36	5.353
53	2	PART	Hexagon headed bolt M14×35		and B	0.096	60	5.757
54	2	PART	Hexagonal socket head screw M24×45		and B	0.316	8	2.528
55	2	PART	Hexagonal socket head screw M16×40		and B	0.108	4	0.431
56	2	PART	Fixed base support rod		Q235	34.698	4	138.790
57	2	PART	Hexagonal socket head screw M16×30		and B	0.092	36	3.314
58	2	PART	Fan base		Q345	294.636	1	294.636
59	2	PART	Ordinary flat key 22×14×8		Al2061-T6	0.063	2	0.126
60	2	PART	Elastic retaining ring type B for shaft 90		Al2061-T6	0.009	2	0.019
61	2	PART	Hexagonal socket head screw M52×300		and B	2.918	8	23.343
62	2	PART	Hexagonal socket head screw M10×25		and B	0.029	4	0.116

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Ministry of Power and Energy

Bolt locking torque:

1. The locking torque for all M8 bolts is 20-30 N.m
2. The locking torque for all M10 bolts is 45-58N.m
3. The locking torque for all M16 bolts is 193-257N.m
4. The locking torque for all M24 bolts is 651-868N.m
5. The locking torque for all M52 bolts is 6000-8000N.m

Technical parameters:

1: Geometry and tolerances refer to standards: ISO 1302(GPS)

NO	DESCRIPTION	DATE	DRAWN	DESIGNED	CHK'D	APPV'D

MAIN CONTRACTOR | CLIENT | PROJECT: WIND TURBINE | DRAWN | DESIGNED | DATE | ISSUE STATUS

Shenzhen Sel... Moldflow An... Technology C...

SCALE | JOB NO. | DRG NO. | REV