GHD Submission – Commonwealth Cleaner Fuels Program: Powering low carbon liquid fuel production in Australia

Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts (DITRDCA) Consultation

19 December 2025

Policy Design Issue – Eligible Fuels

Q1.1: Which LCLF should be eligible under the program and why?

GHD recommends that the Cleaner Fuels Program should make Sustainable Aviation Fuel (SAF) and Renewable Diesel (RD) eligible for support, as these fuels offer the greatest strategic value for Australia's decarbonisation efforts. SAF is essential for the aviation sector, which has few viable alternatives to liquid fuels and is a critical sector given Australia's isolated location, while RD provides an immediate pathway to reduce emissions in heavy transport, mining, and agriculture. Both fuels are well-suited to Australia's needs and align with international climate commitments. A third, but also important fuel focus should be on renewable marine fuels.

Initial focus should be on "like-for-like" replacement fuels that already have distribution and end use infrastructure available. Therefore, SAF and RD should be the primary focus. However, the program should remain open to other low carbon liquid fuels (e.g. sustainable marine fuel, renewable methanol & DME, ammonia, renewable gasoline & LPG) if they can demonstrate substantial lifecycle greenhouse gas reductions, ideally at least 50% compared to fossil fuels, and meet robust sustainability standards. This approach should ensure the program maximises climate benefit, supports decarbonisation in hard-to-abate sectors, and fosters (or at least avoids impeding) innovation.

Q1.2: Should certain types of LCLF be prioritized over others?

GHD believes that certain low carbon liquid fuels should be prioritised within the Cleaner Fuels Program to maximise strategic impact. Sustainable Aviation Fuel (SAF) warrants particular emphasis, given aviation's limited options for decarbonisation and the sector's alignment with international climate targets. Renewable Diesel (RD) should also be strongly supported, as it offers immediate emissions reductions for heavy transport and machinery, where electrification is not yet practical.

Conversely, fuels intended for sectors with viable electrification pathways (such as passenger vehicles) should be deprioritised, as their climate benefit is likely to diminish over time. By focusing incentives on SAF and RD, the program can deliver the greatest value for Australia's decarbonisation goals, fuel security, and economic development, while maintaining a balanced portfolio that encourages innovation and market efficiency.

In the near term, GHD believes that the highest carbon emissions reduction impact could be achieved by focus on RD, then SAF and then marine fuels; however, this will likely change in the medium to longer term as more road transport is electrified, which is largely not possible for aviation and shipping. Therefore the focus should shift in the longer term to prioritise SAF, then marine fuels and then RD.

Policy Design Issue – Type of production support

Q2.1: Should the production credit be fixed or variable?

GHD recommends that the Cleaner Fuels Program adopt a variable, market-indexed production credit – specifically, a Contract-for-Difference (CfD) mechanism, rather than a fixed per-litre payment. A CfD approach provides greater investment certainty for project developers by guaranteeing a minimum strike price for each litre of low carbon liquid fuel produced, while also protecting taxpayers from overpayment if market prices rise.

This mechanism aligns support with actual market conditions, encourages efficiency, and ensures that public funds are used effectively. While a fixed credit is simpler to administer, it risks either under-supporting projects during periods of low prices or overcompensating producers when prices are high. By using a CfD, the program can deliver stable returns to investors, incentivise timely project delivery, and adapt as the market matures.

Q2.2: Should lowest-cost projects be prioritized?

GHD strongly supports prioritising projects that deliver the lowest cost per tonne of carbon emissions abated, rather than simply the lowest cost per litre of fuel produced. Lifecycle emissions reduction should be the central metric for project selection, as it directly aligns with the program's climate objectives and ensures that public investment achieves the greatest possible decarbonisation impact.

By focusing on cost-effectiveness in terms of emissions abatement, the program will reward projects that deliver genuine climate benefits, encourage innovation in reducing carbon intensity, and maximise value for taxpayers. While cost per litre remains a useful secondary consideration, the central criterion should be the lowest cost per tonne of Carbon Dioxide (CO_2) abated.

Q2.3: Should credits be linked to volume or carbon savings?

GHD recommends that while production credits should be paid on a per-litre basis for administrative simplicity, the underlying evaluation and allocation of support should be fundamentally linked to the carbon emissions saving potential of each fuel. By anchoring the program to lifecycle greenhouse gas reductions, the Cleaner Fuels Program can ensure that incentives reward deeper decarbonisation rather than just higher volumes. This approach encourages producers to maximise emissions savings and aligns the program with Australia's climate objectives.

In practice, a blended model, where credits are paid per litre but project selection and funding levels are determined by cost per tonne of CO_2 abated, offers both operational simplicity and strong climate integrity.

Q2.4: Is there a local premium for domestic production?

GHD recognises that producing low carbon liquid fuels in Australia is likely to involve a local premium compared to international benchmarks. This premium reflects Australia's current lack of established infrastructure, higher wage and feedstock logistics costs, and the need to build new supply chains from the ground up.

While domestic production may be more expensive in the short term, these higher costs are justified by the broader economic, strategic, and social benefits – such as job creation, regional development, and enhanced fuel security. Supporting local projects not only accelerates Australia's decarbonisation efforts but also builds sovereign capability and resilience against global supply chain disruptions. Over time, as the industry matures and economies of scale are realised, the local premium is expected to decrease and potentially fall away. Additionally, domestic production ensures that we develop and retain the skills and experience associated with more advanced and low carbon manufacturing processes.

Q2.5: Should production credits be capped?

GHD recommends that the total value of production credits for each project should be capped. Setting a cap helps prevent over-subsidisation, ensures a fair and equitable distribution of public funds, and manages fiscal risk for the program. The cap should be designed to reflect the additional cost required to overcome

Australia's first-mover disadvantage and enable commercial viability, without exceeding what is necessary to bring projects to market. The specific capped amount should be determined based on project scale, expected production volumes, and the prevailing cost gap, with flexibility to adjust as the industry matures.

Q2.6: Should production be focused on domestic supply?

GHD recommends that production incentives under the Cleaner Fuels Program should primarily support domestic supply, ensuring that Australian-produced low carbon liquid fuels contribute directly to national decarbonisation and fuel security goals. However, export should be permitted for surplus volumes or where it is essential for project viability. Restricting exports too tightly could limit market opportunities, discourage investment, and undermine the commercial sustainability of new facilities; especially if domestic demand is initially insufficient to absorb all output. By prioritising domestic use but allowing controlled export, the program can maximise local benefits while maintaining flexibility for producers to respond to market dynamics and international opportunities. For exports, the question of whether the use of the renewable fuel, when delivered to the end user, still leads to carbon emissions reduction when taking into account the carbon emissions associated with export shipping, should be carefully considered.

Additionally, some form of consideration is recommended for comparable global incentives to ensure that local production does not have a disproportionate incentive to be exported as a result of more advantageous global incentives.

Q2.7: Is there a role for combined support?

GHD believes there is a role for combined support; specifically, supplementing production-linked incentives with capital grants, tax incentives or concessional finance for first-of-a-kind facilities or early stage development facilities. Early-stage projects often face significant upfront costs and technology risks that production credits alone may not fully address. By blending capital grants, concessional loans, tax incentives or equity investments with ongoing production incentives, the program can help close the viability gap, attract private investment, and accelerate the development of pioneering projects. Coordination with agencies such as the CEFC and ARENA will be essential to ensure that first movers receive the support needed to reach final investment decision and establish the industry's foundations.

A previous industry example is the development of the LNG industry in Australia; where government enabled the export framework and supported infrastructure approvals while industry delivered the scaled developments and cost reduction measures.

Q2.8: What other funding could support LCLF projects?

GHD recognises that a blended finance approach will be essential to support the commercialisation of LCLF projects in Australia. In addition to production-linked incentives under the Cleaner Fuels Program, projects are likely to require a mix of concessional loans, equity investments, and grants from a range of sources. The CEFC can provide debt finance at concessional rates, helping to lower the cost of capital and attract private lenders. The NRF may offer equity investment or venture financing, particularly for projects that build domestic manufacturing capability or involve innovative Australian technology. ARENA grants can support demonstration and scale-up of new technologies, while state government programs may provide additional funding or tax incentives. By combining these sources, proponents can close viability gaps, manage risk, and accelerate project delivery.

Consideration could also be given for government support associated with the approvals process for a number of these fuels, which may be an expensive and time consuming process and may provide barriers to entry for smaller project developers utilising new or novel processes. This government support could be in the form of grants which should be structured to provide broader support for process types rather than specific projects or developers.

Q2.9: Is other supply chain support needed?

GHD believes that enabling domestic production of LCLF will require support that extends well beyond direct project funding. Critical supply chain enablers include investment in feedstock development, such as incentives for sustainable crop production and improved waste collection systems, as feedstock availability and cost are often the largest constraints for LCLF projects. Upgrades to infrastructure (like storage,

blending, logistics and distribution facilities) are also essential to ensure that new fuels can be efficiently transported and integrated into existing markets.

In addition, robust certification systems are needed to verify sustainability and carbon intensity, while workforce training programs will help build the specialised skills required for this emerging industry. Streamlining regulatory approvals and providing clear, consistent standards will further reduce barriers to project delivery. By addressing these supply chain needs in parallel with financial incentives, the program can help create a supportive ecosystem that accelerates the growth of a competitive and resilient domestic LCLF sector.

Another area worthy of further investigation is how the government may be able to provide offtake contract support for larger LCLF projects. As an example, a key requirement for project financing includes long dated offtake contracts and in the case of SAF production in particular, this offtake contract duration may exceed 10 years. In many instances, the natural offtake party for these contracts (typically airlines) currently operate in a regime of purchasing on spot or hedged markets (rather than long dated supply contracts) and are unlikely to be able to commit the long date offtake contract requirements for a project to secure cost effective financing. In this instance, government support for LCLF offtake need not involve direct fuel procurement or material upfront expenditure. Instead, targeted balance-sheet instruments—such as credit guarantees, contracts-for-difference, volume backstops or buyer-of-last-resort mechanisms—can be used to absorb specific duration, price and credit risks that private offtakers are unable to carry. These mechanisms convert contingent sovereign risk into bankable long-dated revenue certainty, enabling project finance while minimising fiscal outlay.

Finally, in addition to offtake support mechanisms, there is merit in considering government-backed performance insurance for emerging low-carbon liquid fuel technologies. Such an instrument could provide time-limited, contingent cover for clearly defined and independently verifiable technical performance risks (for example plant availability, throughput or conversion efficiency) during initial operating years where private insurance is unavailable or prohibitively priced. By underwriting specific performance outcomes rather than project returns, government could materially reduce financing risk for first-of-a-kind and early commercial projects, crowd-in private capital and accelerate deployment, while maintaining strong incentives for sponsors, EPC contractors and operators to perform and limiting fiscal exposure through capped, conditional and sun-setted support.

Q2.10: What lessons can Australia learn from other jurisdictions?

Use CfD mechanisms, tie incentives to GHG performance, implement mandates, and ensure sustainability. Long-term policy certainty and global alignment are essential.

The United States prioritised enforced demand through blending mandates and crediting schemes, which rapidly unlocked private capital and scaled the renewable fuels industry. By contrast, in Australia, bioethanol mandates in NSW and Queensland have not been effectively enforced. As a result, the domestic industry has contracted, with significant bioethanol and biodiesel capacity now idle in Australia. Demand certainty unlocks investment more effectively than grant funding alone.

Strong carbon rules improve confidence but do not guarantee deployment. The European Union’s RED II and RED III frameworks provide robust carbon accounting and a clear feedstock hierarchy, which has strengthened investor confidence and integrity. To date, these measures have not consistently translated into large-scale biofuels deployment, although they have successfully supported biogas development. Carbon integrity is therefore necessary, but not sufficient on its own to drive industry growth.

Technology-neutral, carbon-intensity-based incentives work best. Experience across multiple jurisdictions shows that LCFS-style mechanisms, which reward verified reductions in carbon intensity, are effective in driving investment while allowing markets to select the most efficient technologies. Declining CI thresholds over time are essential to ensure continuous improvement and cost reduction.

A long-term feedstock strategy is critical. Brazil’s bio-ethanol industry success demonstrates the value of a clear, long-term biofuels vision, strong integration with the agricultural sector, and tradable decarbonisation credits. However, heavy reliance on single feedstocks introduces long-term risk. A diversified, nationally coordinated feedstock strategy is required to support a resilient biofuels industry.

Policy stability is essential to attract capital. Investors require clear, credible policy signals over a 10–15 year horizon, with transparent compliance rules. Frequent policy changes or resets materially increase perceived risk and deter investment, even where underlying economics are attractive.

Successful markets combine early risk-sharing with long-term support. International experience shows that biofuels industries typically require a combination of early-stage capital support or loan guarantees, alongside long-term price support through mandates or credit mechanisms. One without the other has proven insufficient.

Renewable fuels policy should be framed around a four-fold objective:

– Emissions reduction
– Energy security
– Domestic industrial capability and capacity
– Delivery of long-term climate policy objectives

Markets that recognise and design policy around all four objectives have been the most successful in developing durable, investable biofuels industries.

Policy Design Issue – Fuel Production

Q3.1: What production pathways should be prioritized?

GHD recommends that the Cleaner Fuels Program prioritise mature, commercially proven production pathways (such as HEFA and HVO) to deliver significant volumes of low carbon liquid fuels in the near term. These technologies also have a lower CAPEX requirement than other pathways, making it somewhat easier to develop projects. However, restricted and high value feedstocks make these pathways less attractive, particularly as renewable fuels demand, and therefore stress on these feedstocks, increase.

However, it is equally important to allocate a dedicated portion of program funding to emerging pathways, that can make use of low or zero value feedstocks (currently considered wastes), including Fischer-Tropsch synthesis, Alcohol-to-Jet, and Power-to-Liquids. This parallel investment approach, potentially through minimum funding allocations for innovative technologies, ensures Australia remains at the forefront of clean fuel innovation and is prepared for future market and policy developments.

International best practice demonstrates that such dual-track funding accelerates innovation, reduces long-term costs, and avoids technological lock-in. By supporting both proven and emerging pathways, the program can deliver immediate climate benefits while building the foundation for deeper decarbonisation and greater feedstock flexibility in the years ahead. Projects seeking support should demonstrate advanced development and readiness, with clear evidence of technical feasibility and a pathway to final investment decision.

Q3.2: Should there be a minimum facility size?

GHD supports the introduction of a minimum facility size as an eligibility criterion for the Cleaner Fuels Program. Establishing a threshold (such as a minimum annual production capacity) ensures that supported projects are truly commercial in scale and capable of delivering meaningful emissions reductions and market impact. This approach helps to focus public investment on projects that can contribute significantly to Australia's decarbonisation goals, while smaller or pilot-scale initiatives can continue to seek support through other research and development or demonstration funding streams.

The specific minimum size should be set with reference to international benchmarks and the practical realities of the Australian market, but a threshold in the range of 10 million litres per year is likely appropriate for distinguishing commercial-scale projects from smaller pilots. This ensures that program resources are directed towards facilities that can achieve economies of scale, attract private investment, and accelerate the growth of a robust domestic low carbon liquid fuels industry.

Potential advantages to be gained from economies of scale for these projects should be offset against the challenge to produce large enough volumes at consistent quality feedstock.

Q3.3: Should LCLF meet a carbon intensity threshold?

GHD recommends that all low carbon liquid fuels supported under the Cleaner Fuels Program should be required to meet a clear carbon intensity threshold to ensure genuine climate benefit. A minimum lifecycle greenhouse gas reduction of 50% compared to the fossil fuel equivalent is broadly consistent with international best practice and provides a robust benchmark for eligibility. This threshold should be calculated using standardised lifecycle assessment methodologies, ideally aligned with recognised frameworks such as the Guarantee of Origin scheme, CORSIA, or the EU Renewable Energy Directive.

Verification should include all relevant emissions sources, and consideration should be given to including indirect land use change (ILUC) where feasible, to ensure the integrity of the program. Setting and enforcing a strong carbon intensity threshold will help direct support to projects that deliver meaningful emissions reductions and maintain the credibility of Australia's clean fuels industry.

Q3.4: Should other sustainability criteria be included?

GHD recommends that the Cleaner Fuels Program include comprehensive sustainability criteria beyond carbon intensity to ensure that supported projects deliver broad environmental and social benefits. In addition to lifecycle greenhouse gas reduction, eligibility should consider factors such as land use,

biodiversity, water use, food security, and social impacts. This should also include community engagement and First Nations participation.

Q3.5: Which schemes should verify sustainability?

Internationally recognized certifications like RSB, ISCC, and CORSIA-approved schemes should be accepted. For marine fuels, something similar to CORSIA is still developing, with the EU FuelEU Maritime setting GHG intensity limits on energy used onboard ships from 2025. The International Maritime Organisation (IMO) has been working on putting a similar scheme in place but this has not yet happened. Australia has agreed to be compliant to CORSIA and should follow any schemes proposed by the IMO to determine if that should be agreed to.

In Australia, the GO scheme and Renewable Gas Certification have been rolled out:

The GO scheme has been rolled out by the Commonwealth Government to measure, track and verify a range of product value chain attributes, including greenhouse gas emissions (Commonwealth DCCEEW 2024a; OECC 2023b). The GO scheme comprises a robust internationally aligned product-based emissions accounting framework, and the certification of renewable energy. The proposed scheme will help the Australian energy industry meet the growing domestic and international demand for verified and certifiable renewable electricity and low emissions products. Participation in the scheme is voluntary and can be used by businesses and governments to unlock opportunities for trade, decarbonisation and investment in green markets.

In August 2023, GreenPower® launched the Renewable Gas Certification which supports the acceleration of new renewable gas projects in Australia and helps businesses reduce emissions through Renewable Gas Guarantees of Origin (RGGOs) certificates (OECC 2023a). The voluntary scheme would allow commercial and industrial gas consumers to purchase renewable gas certificates to reduce emissions associated with their gas consumption. To be eligible for certification, the emissions intensity of the renewable gas project must be lower than the equivalent emissions intensity for fossil natural gas, and feedstocks must be classed as renewable. The program currently focuses on mature technologies such as biogas, biomethane and renewable hydrogen, with Jemena's Malabar Biomethane Project accredited as the first participant in December 2023.

The Guarantee of Origin scheme should be expanded to include LCLF, and the Renewable Gas Certification scheme could be used as an example of what and how to roll out for the LCLF industry. Learnings from this scheme roll-out could also be applied to avoid pitfalls.

Policy Design Issue – Other Policy Considerations

Q4.1: What factors should affect merit of a proposal?

GHD supports a multi-criteria approach to assessing the merit of proposals under the CFP. While cost-effectiveness and lifecycle emissions reduction should remain central, other factors are critical to ensuring the program delivers broad economic and social benefits. These include:

- Carbon reduction potential: Projects should demonstrate significant lifecycle greenhouse gas savings, particularly in hard-to-abate sectors such as aviation, heavy transport (land and marine) and industries where fired heat is required.
- Economic and regional benefits: Proposals should create high-quality jobs, strengthen regional economies, and contribute to workforce development. This should include opportunities for First Nations communities.
- Fuel security: Projects that enhance Australia's sovereign fuel capability (particularly strategically important fuels such as kerosene and diesel) and reduce reliance on imports should be prioritised.
- Sustainability: Beyond carbon intensity, projects should meet robust environmental and social criteria, including responsible feedstock sourcing and biodiversity protection.
- Market efficiency and scalability: Proposals that secure offtake agreements, enable price discovery, and reduce barriers for future projects should score highly.
- Bankability and Risk Allocation: Explicit recognition that capital markets constraints, not generally technology readiness alone, are the binding constraint. Assessment criteria should consider how a project reduces financing risk (e.g. offtake structure, guarantees, insurance, concessional debt).
- Learning and Knowledge Transfer: Value projects that generate transferable operational learning, Australian IP, or replicable design standards. Encourage open (non-commercial) reporting of performance data for early projects.
- System Integration and Infrastructure Readiness: Merit for projects that co-locate with ports, pipelines, refineries, airports, or hydrogen/CO_2 infrastructure. Alignment with future SAF blending, storage, and distribution pathways.
- Policy Optionality: Preference for projects that keep future policy options open (e.g. compatibility with mandates, LCFS-style schemes, export markets).

A transparent, weighted evaluation framework incorporating these factors will ensure that public investment delivers maximum climate impact, economic value, and long-term industry resilience.

Q4.2: How do Community Benefit Principles apply?

GHD considers the Community Benefit Principles to be highly relevant to the Cleaner Fuels Program and recommends that they be embedded as mandatory project design requirements, rather than treated as secondary or qualitative considerations.

Proponents should be required to demonstrate how projects will deliver:

- Safe, secure and high-quality employment, including workforce training and long-term skills development aligned with advanced manufacturing and process industries.
- Meaningful local and regional engagement, particularly for projects located in regional or industrial precincts, including early consultation and transparent communication throughout development and operations.
- First Nations participation, through employment, training, procurement, equity participation, or benefit-sharing arrangements where appropriate.
- Local supply chain development, including opportunities for Australian engineering, construction, operations, and maintenance capability.
- Transparency and accountability, including public reporting on community engagement outcomes and workforce metrics.

Embedding these principles upfront will improve social licence, reduce delivery risk, and ensure that public investment delivers durable economic and social value alongside emissions reduction.

Q4.3: How will overseas policy developments interact?

Overseas policy developments will have a material influence on both the demand for, and competitiveness of, Australian-produced low carbon liquid fuels. Global initiatives such as ICAO's CORSIA framework, ReFuelEU Aviation, FuelEU Maritime, and SAF mandates in the United States and Asia are creating rapidly expanding markets and clear compliance-driven demand.

Australia's Cleaner Fuels Program should be designed to:

- Align with international sustainability and certification frameworks, ensuring Australian fuels are export-ready and recognised in global markets.
- Remain competitive with overseas incentives, particularly where foreign subsidies or mandates may otherwise draw investment offshore.
- Provide policy certainty that complements global demand growth, enabling Australian projects to access both domestic and export markets without being disadvantaged.

Failing to align domestic policy settings with international developments risks Australia becoming a technology taker and fuel importer rather than a producer and exporter of low carbon fuels.

Q4.4: What other measures are critical for FID?

While production credits are essential, they are unlikely to be sufficient on their own to enable FID for most LCLF projects. GHD recommends consideration of complementary measures that address key residual risks, including:

- Long-dated offtake support, through balance-sheet mechanisms such as offtake guarantees, contracts-for-difference, volume backstops, or buyer-of-last-resort arrangements.
- Concessional finance, including CEFC debt, guarantees, or structured finance to reduce the weighted average cost of capital.
- Government-backed performance insurance for first-of-a-kind or early commercial technologies, covering defined technical performance risks during initial operating periods.
- Streamlined and coordinated approvals, including clear guidance on environmental, planning, and fuel certification requirements.
- Early infrastructure support, particularly for storage, blending, logistics, and port or airport interfaces.

Together, these measures address the full risk stack faced by investors and materially improve the likelihood of projects reaching FID.

Q4.5: What intersecting policies need consideration?

The success of the Cleaner Fuels Program will depend on effective coordination across a wide range of intersecting policy domains, including:

- Climate and emissions policy, including Safeguard Mechanism settings, carbon accounting rules, and Guarantees of Origin.
- Energy and electricity policy, particularly renewable energy availability and grid access for power-intensive pathways.
- Transport and infrastructure policy, covering fuel standards, blending limits, port and airport infrastructure, and logistics.
- Agriculture, waste and land-use policy, which influence feedstock availability, sustainability, and cost.

- Trade and industry policy, including export controls, trade agreements, and industrial development strategies.

A whole-of-government approach is essential to avoid policy misalignment, duplication, or unintended barriers to investment.

Q4.6: Any other feedback?

GHD recommends that the Cleaner Fuels Program be framed within a clear, long-term national strategy for low carbon liquid fuels, extending beyond individual funding rounds. Key elements should include:

- A transparent 10–15 year policy roadmap to support investor confidence.
- Built-in monitoring, review and adjustment mechanisms to allow settings to evolve as technologies mature and costs fall.
- Clear articulation of additionality and public benefit, ensuring support delivers outcomes that would not otherwise occur.
- Strong public communication and stakeholder engagement, building understanding of the role of low carbon fuels in Australia's net zero transition.
- Explicit consideration of export pathways, ensuring domestic capability can scale with global demand.

By positioning the CFP as a market-shaping, system-wide intervention rather than a standalone grant program, government can maximise its impact and support the development of a resilient, competitive and globally relevant Australian LCLF industry.

We welcome the opportunity to discuss our feedback in more detail with the Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts (DITRDCA) or other relevant government departments as required and we appreciate the opportunity to provide this feedback as part of this consultation process.

Yours sincerely,

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