

Transport and Infrastructure Net Zero Consultation Roadmap

Take the survey

Department of Climate Change, Energy, Environment and Water

Response received at:

July 29, 2024 at 5:35 PM GMT+10

Response ID:

sbm2f93835f57fcbd63810a0

- 1 Confirm that you have read and understand this privacy notice.
Yes
- 2 Please indicate how and if you want your submission published.
Public and anonymous
- 3 Published name
Not answered
- 4 Confirm that you have read and understand this declaration.
Yes
- 5 First name
[REDACTED]
- 6 Last name
[REDACTED]
- 7 Email
[REDACTED]

- 8 Phone
Not answered
- 9 Who are you answering on behalf of?
Organisation
- 10 Organisation name
[REDACTED]
- 11 What best describes you or your organisation?
Industry
- 12 What sector do you represent?
Energy
- 13 What state or territory do you live in?
Outside Australia
- 14 Postcode
Not answered
- 15 What area best describes where you live?
City
- 16 1. Do you support the proposed guiding principles?
Yes
- 17 1.1 Please add details to your response.
Not answered
- 18 2. Do you support the use of the avoid-shift-improve framework as a tool to identify opportunities for abatement?
Yes

- 19** 2.1 Please add details to your response.
Not answered
- 20** 3. Do you agree the development of a national policy framework for active and public transport will support emissions reduction?
Yes
- 21** 3.1 Please add details to your response.
Not answered
- 22** 4. What should be included in a national policy framework for active and public transport and how should it be developed?
Not answered
- 23** 5. What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to ensure the movement of people contributes to transport emissions reduction?
Not answered
- 24** 6.1 What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to ensure that the movement of goods contributes to transport emissions reduction?
Not answered
- 25** 6.2. How would these actions address the identified challenges and opportunities for emissions reduction in the movement of goods?
Not answered
- 26** 7. Do you agree with the proposed net zero pathway for light road vehicles?
Not answered

- 27 7.1 Please add details to your response.
Not answered
- 28 8. The Australian Government is currently developing an Australian New Vehicle Efficiency Standard and has already begun to implement actions in the National Electric Vehicle Strategy.8.1 What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to reduce light vehicle emissions?
Not answered
- 29 8.2 How would these actions address the identified challenges and opportunities to reduce light vehicle emissions?
Not answered
- 30 9. Do you agree with the proposed net zero pathway for heavy road vehicles?
Not answered
- 31 9.1 Please add details to your response
Not answered
- 32 10. The proposed pathway for heavy road vehicles relies on a mix of battery electric, hydrogen fuel-cell and low carbon liquid fuels.Rank from 1 to 3, the order in which these should be prioritised for emissions reduction.
1: Battery electric
2: Low carbon liquid fuels
3: Hydrogen fuel cell
- 33 10.1 Please add details to your response. Why did you rank them in that order?
Not answered

- 34 11. What role should low carbon liquid fuels play in the heavy vehicle decarbonisation?
Not answered
- 35 12. What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to reduce heavy vehicle emissions?
Not answered
- 36 13. Do you agree with the proposed net zero pathway for rail?
Not answered
- 37 13.1 Please add details to your response.
Not answered
- 38 14. The proposed pathway for rail relies on a mix of battery electric, hydrogen fuel-cell and low carbon liquid fuels. Rank from 1 to 3, the order in which these should be prioritised for emissions reduction.
Not answered
- 39 14.1 Please add details to your response. Why did you rank them in that order?
Not answered
- 40 15. What role should low carbon liquid fuels play in rail decarbonisation?
Not answered
- 41 16. What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to reduce rail emissions?
Not answered

- 42 16.1 How would these actions address the identified challenges and opportunities to reduce rail emissions?
Not answered
- 43 17. Do you agree with the proposed net zero pathway for maritime?
Not answered
- 44 17.1 Please add details to your response.
Not answered
- 45 18. The Australian Government is engaging in consultation as part of the development of the Maritime Emissions Reduction National Action Plan and those consultations will also inform the final Roadmap and Action Plan. 18.1 What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to reduce maritime emissions?
Not answered
- 46 18.2 How would these actions address the identified challenges and opportunities to reduce maritime emissions?
Not answered
- 47 19. Do you agree with the proposed net zero pathway for aviation?
Partially
- 48 19.1 Please add details to your response.
The proposed net zero pathway is written at a high level. [REDACTED] supports the pathway, but key to reaching the pathway are the regulatory instruments that will help realize the goals that will be set. [REDACTED] has realized that these goals can only be achieved with a combination of demand and supply side regulations. The combination of demand and supply side measures each other since producers and users will be able to find each other and can synergistically work together. On the demand side for example a mandate or a LCFS type of instrument to ensure plenty of demand for SAF facilities in Australia. Secondly, these instruments should be supported with supply side instruments and a

regulatory framework which clearly states the environmental demands SAF has to comply to, such as policy on feedstocks, greenhouse gas emission reduction requirements, LCA methodologies etc. Furthermore, the realization of SAF production in Australia will be most effective if these facilities are included in a framework of industrial and energy policy. If the policy roadmaps for renewable electricity, bioenergy and others do not take the realization of LCLF production facilities into account this can reduce the speed in which these facilities are realized.

- 49 20. The Australian Government has already engaged in consultation on aviation decarbonisation through the development of the Aviation White Paper and those consultations will also inform final Roadmap and Action Plan.

Not answered

- 50 20.1 What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to reduce aviation emissions?

A couple of important regulatory requirements are stated in question 19. Additionally, governments, communities and industry have to work together to realize the necessary infrastructure, including blending infrastructure and infrastructure to mobilize the necessary feedstock streams including renewable electricity production.

Question 20.2 misses. Our response to this question is the following:

20.2. How would these actions address the identified challenges and opportunities to reduce aviation emissions?

The introduction of a blending mandate not only reduces the emissions of CO₂ within aviation, but it also reduces the emissions of air pollutants and the non-CO₂ climate effects of aviation. To make the SAF truly sustainable a proper greenhouse gas methodology needs to be combined with additional feedstock sustainability and emission reduction criteria. Finally, the SAF needs to be produced in Australia to realize the job growth instead of only importing SAF from other countries. Additional support schemes are needed to ensure the production capacity is achieved within Australia. These support schemes should have obligations on social and environmental progress to ensure that the local environment as well as the local people benefit from the realization of SAF plants. Examples can be participation of local communities in renewable energy projects, additional requirements on water preservation or requirements in nature preservation.

51 21. Do you agree with the proposed net zero pathway for transport infrastructure?

Not answered

52 21.1 Please add details to your response.

Not answered

53 22. What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to reduce transport infrastructure emissions and ensure that transport infrastructure is ready for and enables low-emission transport modes?

Not answered

54 22.1 How would these actions address the identified challenges and opportunities to reduce transport infrastructure emissions?

Not answered

55 23. What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to ensure the energy mix is ready to support transport emissions reduction?

The most important task for the Australian government is to realize plenty of renewable electricity generation combined with the infrastructure to facilitate the production of LCLF.

56 24. How should the use of low carbon liquid fuels (LCLFs) be prioritised across different transport modes over time to achieve maximum abatement?

There are a couple of sectors that currently utilize fossil fuels that should transition to renewables: industrial heat, road transport, rail transport, shipping and aviation. In general, [REDACTED] is in favour of decarbonizing the hard-to-abate sectors, such as shipping and aviation with LCLF and electrifying the others. Australia might have a small exception. The majority of road transport in Australia around the coast can and will be electrified. The economics slowly start to speak for itself, but the vast Australian outback might not

be ideal for electric cars due to the distances and the heat, but in general we are in favour of electrification wherever possible. Therefore we are in favour of prioritization of aviation and shipping, a smaller volume for heavy duty road transport.

57 25. What are the best ways for the Australian Government to work collaboratively with industry, business, governments and communities to implement the proposed pathways?

Through conversations and consultations. It is important that developers of LCLF production facilities are aware of the policies upcoming and the potential that these incentives will create. Finally, it is very important that the Australian government can give long-term certainty for these developers so they can realize these projects. Platforms which are designed to bring together these diverse stakeholders to jointly discuss, design and implement policy can ensure broad buy-in and identify challenges early in the policy development process. It is particularly important to include local communities, labor organizations and NGOs in these discussions to ensure their perspectives are heard.

58 25.1 What are good domestic or international examples of partnership and collaboration on transport and transport infrastructure emissions reduction that could inform the final Roadmap and Action Plan?

Mission Innovation on integrated biorefineries is a strong example of an international partnership of countries that try to realize innovative new production pathways for LCLF. The UK's Jet Zero Council helped bring together stakeholders to advance aviation climate policy in the UK. The US Biden Administration's SAF Grand Challenge is another example of political leadership bringing a whole of government approach to scaling the production and use of SAF. In this case, the administration coordinated the Environmental Protection Agency, Departments of Energy and Transport and the United States Department of Agriculture to work together to achieve an ambitious goal of 100% SAF usage in 2050.

59 25.2 What opportunities can Government leverage to show leadership in Australia and internationally?

Australia can show leadership by utilizing its potential for renewable electricity and feedstocks for LCLF production. Committing to participating in international platforms for collaboration like the Zero Emissions Vehicle Alliance and the Clean Energy Ministerial as a few examples, enables Australia to learn, collaborate and be challenged by the efforts of other countries on these topics. They also offer venues for closer coordination and international partnerships that can support Australia in its leadership on these topics.

- 60 26. What measures and metrics should be used to evaluate the final Transport and Infrastructure Net Zero Roadmap and Action Plan?
This depends on the targets set and measures created by the Australian government.
- 61 26.1 What other data and evidence could governments use and how could this offer further insights on the pace, scale and location of transport emissions reduction pathways?
Not answered
- 62 27. Do you have any feedback on the proposed review process?
Not answered
- 63 28. Do you have any further feedback on the Consultation Roadmap and proposed pathways?
Not answered
- 64 28.1 Is there anything missing? Are the sections appropriately integrated? Is the Roadmap appropriately ambitious?
Not answered
- 65 29. Is there any further information or documentation that you wish to be considered with your submission?
Not answered
- 66 Would you like to upload a document?
Yes
- 67 Have you removed any identifying information from your submission?
Yes
- 68 Upload a submission
240725 Consultation response [REDACTED] transportation roadmap.pdf

69 Upload a submission

Not answered

70 Upload supporting file

Not answered

71 Upload supporting file

Not answered

Dear,

██████████ is grateful for the opportunity to respond to the consultation on the Transport and Infrastructure Net Zero Consultation Roadmap. ██████████ is a project developer, trader, and future producer of Sustainable Aviation Fuels (SAF). ██████████ looks with great interest at Australia since it is a market with a high potential for production and uptake of SAF. We are therefore keen to respond to the consultation and are willing to share our knowledge on SAF and SAF policies.

Given Australia's reliance on aviation to bridge vast distances internally and internationally, reducing emissions is the optimal approach for cleaner aviation. Yet, if air travel is necessary, it should be conducted in an environmentally sustainable manner. Even though SAF is not expected to reach price parity with fossil jet fuel we believe that the transportation sectors should take responsibilities and inset emission reduction and that SAF is an important instrument to do so. With the electrification of road fuels and the production of alternative fuels for shipping and aviation, not only greenhouse gas emissions are reduced, but also polluting NO_x emissions and non-volatile particulate matter.

As part of this consultation we will answer the questions relevant to ██████████G and aviation:

19. Do you agree with the proposed net zero pathway for aviation?

The proposed net zero pathway is written at a high level. ██████████ supports the pathway, but key to reaching the pathway are the regulatory instruments that will help realize the goals that will be set. ██████████ has realized that these goals can only be achieved with a combination of demand and supply side regulations. The combination of demand and supply side measures each other since producers and users will be able to find each other and can synergistically work together. On the demand side for example a mandate or a LCFS type of instrument to ensure plenty of demand for SAF facilities in Australia. Secondly, these instruments should be supported with supply side instruments and a regulatory framework which clearly states the environmental demands SAF has to comply to, such as policy on feedstocks, greenhouse gas emission reduction requirements, LCA methodologies etc. Furthermore, the realization of SAF production in Australia will be most effective if these facilities are included in a framework of industrial and energy policy. If the policy roadmaps for renewable electricity, bioenergy and others do not take the realization of LCLF production facilities into account this can reduce the speed in which these facilities are realized.

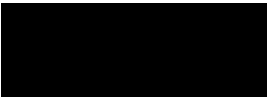
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20.2. How would these actions address the identified challenges and opportunities to reduce aviation emissions?

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23. The Australian Government invited views on aspects of the energy transformation that represent the most material challenges and opportunities for the electricity and energy sector. Submissions closed on Friday 12 April 2024 (AEDT). This feedback will be used to inform the development of the Electricity and Energy Sector Plan and Net Zero Plan. The Australian Government will be undertaking targeted consultation to identify options for production incentives to support the establishment of a made in Australia low carbon liquid fuel industry, including through the release of a low carbon liquid fuels consultation paper. Feedback heard through this process will also inform development of the final Transport and Infrastructure Net Zero Roadmap and Action Plan. What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to ensure the energy mix is ready to support transport emissions reduction?

The most important task for the Australian government is to realize plenty of renewable electricity generation combined with the infrastructure to facilitate the production of LCLF.

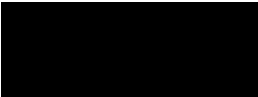
24. How should the use of low carbon liquid fuels be prioritised across different transport modes over time to achieve maximum abatement?

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26. What measures and metrics should be used to evaluate the final Transport and Infrastructure Net Zero Roadmap and Action Plan?

This depends on the targets set and measures created by the Australian government.

We will gladly elaborate on our views in a conversation,