

Transport and Infrastructure Net Zero Consultation Roadmap

Take the survey

Department of Climate Change, Energy, Environment and Water

Response received at:

August 15, 2024 at 11:57 AM GMT+10

Response ID:

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

- 8** Phone
Not answered
- 9** Who are you answering on behalf of?
Organisation
- 10** Organisation name
Association of Mining and Exploration Companies
- 11** What best describes you or your organisation?
Not answered
- 12** What sector do you represent?
Not answered
- 13** What state or territory do you live in?
Western Australia
- 14** Postcode
6005
- 15** What area best describes where you live?
City
- 16** 1. Do you support the proposed guiding principles?
Not answered
- 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?
Not answered

- 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?
Not answered
- 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.
Not answered
- 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?

Not answered

48 19.1 Please add details to your response.

Not answered

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?
Not answered
- 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?
Not answered
- 56 24. How should the use of low carbon liquid fuels (LCLFs) be prioritised across different transport modes over time to achieve maximum abatement?
Not answered

- 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?
Not answered
- 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?
Not answered
- 59 25.2 What opportunities can Government leverage to show leadership in Australia and internationally?
Not answered
- 60 26. What measures and metrics should be used to evaluate the final Transport and Infrastructure Net Zero Roadmap and Action Plan?
Not answered
- 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
0726_AMEC_submission_DCCEEW_Transport_and_Infrastructure_Net_Zero_Plan_Public.be
5cd394_Redacted.pdf
- 69 Upload a submission
Not answered
- 70 Upload supporting file
Not answered
- 71 Upload supporting file
Not answered

To: Department of Infrastructure, Transport, Regional Development, Communication, and the Arts (DITRDCA)

Re: Transport and Infrastructure Net Zero Plan

26 July 2024

Introduction

AMEC appreciates the opportunity to provide feedback to the Department of Infrastructure, Transport, Regional Development, Communication, and the Arts (DITRDCA)'s Transport and infrastructure Plan (the Plan).

About AMEC

The Association of Mining and Exploration Companies (AMEC) is a national industry association representing over 550 member companies across Australia. Our members are mineral explorers, emerging miners, producers, and a wide range of businesses working in and for the industry. Collectively, AMEC's member companies account for over \$100 billion of the mineral exploration and mining sector's capital value.

About Industry

Mineral exploration and mining make a critical contribution to Australia's economy, directly employing over 274,000 people. In 2022-23 Industry generated a record high \$466 billion in resources exports, invested \$4.27 billion (2023) in exploration expenditure to discover the mines of the future, and collectively paid over \$63 billion in royalties and taxes.

The minerals mined in Australia are critical for the achievement of global goals to reduce GHG. The International Energy Agency has noted that "since 2010 the average amount of minerals needed for a new unit of power generation capacity has increased by 50% as the share of renewables in new investment has risen"¹. Where those minerals are mined will determine what level of environmental regulation is accepted.

Australia's mineral resource advantage

Australia has the minerals resources and established mining industry to create an expanded downstream value-add resources industry.

- World's largest economic resources of iron ore, gold, nickel, uranium, lead, zinc, zircon, rutile and top five resources of copper, silver, vanadium, bauxite, cobalt, lithium, magnesite, manganese ore and molybdenum.
- World's largest exporter of iron ore, bauxite, lithium and rutile, and top five producer of gold, cobalt, rare earths, uranium, lead, manganese, and nickel.²

¹ <https://www.iea.org/reports/the-role-of-critical-minerals-in-clean-energy-transitions/executive-summary>

² Geoscience Australia. 2023. Australia's Identified Mineral Resources 2023. <https://www.ga.gov.au/digital-publication/aimr2022/aimr-2023-preliminary-tables>

Australia has the mineral resources that the world needs for the growth of renewables, space, defence, medical applications as well as general construction needs. However, Australia must act fast if it is to capture the market share of decarbonised minerals and metals processing before the capital is invested in other countries.

General Comments

This Plan is one of several similarly focussed documents that are being consulted at a Commonwealth and State level that layer further considerations on how transport and infrastructure can support Australia's reduction in GHG.

Industry has noted the marginal gain for investment is lower in transportation because the investment required is a quantum higher than in the electricity sector for roughly the same amount of emissions left to abate.

Multiple plans

It has also been noted that there has been an increase in these documents, and it is creating a degree of confusion in Industry. While each document is well intended, there is no clear hierarchy between them. Industry is faced with balancing a range of expectations in each document. The explicit regulatory role of this document is also unclear. It is not legislation, nor is it regulation, it is also not guidance. It does however, extensively, detail the Government's intentions.

It has been noted that there are currently six economy wide sector plans being drafted and coordinated via the Climate Change Authority (CCA): Energy & Electricity; Transport & Infrastructure; Resources; Agriculture & Land; Industry & Waste; and Built Environment. Most mining companies in Australia with a developed asset will be impacted by each of these.

Furthermore, Industry has noted the similarity of this document to the Western Australian State Government's Transport Sectoral Emissions Reduction Scheme published in December 2023.

How this Plan integrates and interrelates with the other net zero plans needs to be clarified by the Commonwealth Government. A clear hierarchy that clarifies what the Government's expectations are for the end user is needed.

Safeguard mechanism.

The interaction with the Commonwealth Government's safeguard mechanism needs to be explicitly and comprehensively addressed. While the interrelatedness with sub-jurisdictional documentation that addresses similar matters may be considered beyond the remit – the Safeguard mechanism is Commonwealth legislation. It is the primary legislative framework for managing carbon in Australia and must be directly addressed.

Technological development

The mining and mineral exploration have limited choices for technology providers. The equipment manufacturers have suggested that there is limited market demand to justify the necessary technology investment. The technology challenges are related to the replacement of diesel, mine electrification, distance haulage and stationary fast charging batteries. There is a lack of readiness at scale to provide ecological processing will not achievable until well until the 2030s.

Infrastructure Challenges

The Plan as proposed, does not actually show for the consultation what the key transport routes or links and hubs to enable efficient movement of materials supporting the Australian economy are.

There is concern that the Plan does not sufficiently acknowledge how raw materials are moved across country via road trains and a fragmented rail system with non-standard rail gauges. With further complexities with many privately held assets secured that are held in unique tenure that prescribe rights to the owners (for example in State Agreements in Western Australia).

Industry has noted that there are many different sources of emissions to move raw materials from mine to customer, which are called out in the matrix in the Plan. However, for the specific sector plans such as for transport, the detailed knowledge for how this can occur, rests with larger engineering firms, government departments and industry.

Diesel Fuel Tax Credit Scheme

While not mentioned the Diesel Fuel Tax Credit is implicit in this document. Australian mining, mineral exploration and agricultural industry receives the diesel fuel tax credit rebate because they drive vehicles on non-public roads and the tax is levied explicitly to reflect that public road usage, and the cost of public road repair as a result of use. It is unjust to tamper with this diesel fuel tax credit scheme to pursue other policy objectives.

Final comments

While the Plan is welcomed further detail on how this Plan relates to other plans, will address infrastructure challenges, and reaffirm the importance of the Diesel Fuel Tax Credit Scheme are needed.

For further information contact:

Neil van Drunen

Director, WA, SA, NT, Commonwealth Policy

AMEC

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