Transport and Infrastructure Net Zero Consultation Roadmap

Take the survey

Department of Climate Change, Energy, Environment and Water

Response received at:
August 6, 2024 at 4:06 PM GMT+10

Response ID:
sbm2fbc6452339c9060d3a75

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
GrainGrowers

4 Confirm that you have read and understand this declaration.
Yes

5 First name
Annabel

6 Last name
Mactier

7 Email
[redacted]

8 Phone

[redacted]

9 Who are you answering on behalf of?

Organisation

10 Organisation name

GrainGrowers Limited

11 What best describes you or your organisation?

Not for profit

12 What sector do you represent?

Other: "Grain"

13 What state or territory do you live in?

New South Wales

14 Postcode

2000

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

LT240806_Transport and Infrastructure Net Zero Consu.pdf

69 Upload a submission

Not answered

70 Upload supporting file

Not answered

71 Upload supporting file

Not answered

6 August 2024

Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
CANBERRA ACT 2601
Via: NetZero@infrastructure.gov.au

Re: Transport and Infrastructure Net Zero Consultation Roadmap

GrainGrowers welcomes the opportunity to comment on the Transport and Infrastructure Net Zero Consultation Roadmap.

GrainGrowers is a national organisation working to enhance the profitability and sustainability of Australian grain growers. We achieve this through our focus areas of policy and advocacy, grower engagement, thought leadership and active investment in future focused activities for all growers. Australian growers are at the heart of all that we do and the focus of our work.

The transition to low emission transport poses a significant challenge for Australia's $31.1 billion grain industry and will represent a fundamental shift in domestic grain production. From sowing crops to transporting grain to market, diesel is currently an essential component of the grain supply chain.

The grain freight industry is considered especially hard to abate as grain freight movements are typically characterised by long, complex and multi-directional freight journeys often across multiple modes of transport in regional and remote areas.

To ensure the Transport and Infrastructure Net Zero Consultation Roadmap reflects the unique requirements of the grain industry, GrainGrowers makes the following recommendations:

1) **<u>Support the development of a domestic low carbon liquid fuels industry</u>**

Domestically manufactured low carbon liquid fuels can play an important role as an intermediary transition tool for reducing emissions in hard to abate industries such as agriculture, heavy vehicles and aviation.

Low carbon liquid fuels are a commercially available technology that can be used within existing combustion engines and fuel supply and end-use infrastructure, ensuring minimal modification and expense is required.

This is especially important for the grain industry, which often has long asset investment lifecycles due to the high cost of grain freight transport infrastructure.

Grain Growers Limited
ABN 25000245269

Level 19, 1 Market Street, Sydney NSW 2000 Australia | PO Box Q1355, Queen Victoria Building NSW 1230 Australia
Tel +61 2 9286 2000 | Freecall 1800 620 519 | Email enquiry@graingrowers.com.au | **www.graingrowers.com.au**

The Australian grains industry is also poised to play a crucial role in the development of low-carbon liquid fuels as one of the largest grain exporters in the world and grows an abundance of crops that can be used for low carbon liquid fuels such as canola and sorghum.

2) Establish a joint industry-government working group to develop a National Feedstock Strategy for Australia's low carbon liquid fuel industry

To harness our position as a world leading feedstock producer, it is vital the Australian Government establish a joint industry-government working group to develop a National Feedstock Strategy for the development of a domestic low carbon liquid fuel industry.

It is important that feedstock industries are consulted in the development of sustainability criteria and quotas for domestically grown feedstocks to ensure criteria reflect Australia's unique conditions.

A National Feedstock Strategy could ensure Australia is able to provide a sustainable, consistent supply of raw materials necessary for producing low-carbon liquid fuels, reducing dependency on imported feedstocks, and enhancing fuel security.

By optimising the use of Australia's vast agricultural resources, a National Feedstock Strategy would promote the efficient use of feedstocks to support rural economies and create job opportunities, positioning Australia as a leader in the global low-carbon energy market and contributing significantly to national emission reduction targets.

3) Ensure a technology-agnostic approach for nascent technologies

GrainGrowers is concerned that the consultation paper is asking industry to rank nascent technologies which are yet to be commercialised.

While low carbon liquid fuels such as biofuel are already proven, commercially available technologies, hydrogen and battery technologies for heavy vehicles are still being developed.

A robust decarbonisation roadmap must ensure flexibility and nimbleness to preserve optionality in the event of future technological advancements. Prioritising certain technologies which are yet to be commercialised increases risk by creating a prescriptive regime which stifles innovation.

Especially for agriculture, future low carbon fuel requirements may be task and location -specific.

As noted in Agrifuture's report, *The Diesel Transition: Petroleum diesel alternatives for the Australian agriculture, fisheries and forestry sector,* "No one size fits all solution or 'silver bullet' fuel will meet the energy needs of a diverse set of industries and communities."

Similarly, GrainGrowers' *Fuels Inputs of the Future* report found that the transition away from diesel on farms will likely involve a mix of low carbon technologies, based on factors such as availability, cost, infrastructure, and technological advancements over time.

4) Recognise the unique requirements of commercial light vehicles such as farm utes

It is vital the *Transport and Infrastructure Road Map* reflects the unique operating requirements of commercial light vehicles used in primary production such as Utes operated in regional areas.

Utes are indispensable tools for farmers, playing a crucial role in the daily operations of agricultural production. GrainGrowers is concerned that the draft road map does not sufficiently differentiate between the requirements of light commercial vehicles, such as Utes operating in regional and remote areas, and passenger vehicles.

Utes involved in primary production will often be used to transport supplies or equipment over long distances in rural and remote environments. This creates significant challenges for electrification in comparison to passenger vehicles used for short commutes in urban settings such as lack of appropriate electric models and limited charging infrastructure in regional and remote areas.

5) Remove barriers to the National Performance Based Standards Scheme

Facilitating greater uptake of heavy vehicles using the performance-based standard (PBS) scheme, represents a viable way to significantly reduce heavy vehicle emissions using existing technologies.

PBS heavy vehicles present significant environmental benefits compared to the broader heavy vehicle fleet. Indeed, the NHVR estimates that as of March 2019, the PBS fleet provided annual savings of 200 million litres of fuel and 486,000 tonnes of carbon dioxide emissions. There are currently several barriers to the National PBS scheme. This includes a convoluted approval process with lengthy and complex permits, which are creating a system that is prohibitive for smaller agricultural operators and is impeding the full benefits of the scheme.

GrainGrowers would welcome the opportunity to discuss these issues further. Should we be able to provide further assistance or if there are any enquiries relating to our submission, please contact Annabel Mactier, Policy Manager, Trade and Supply Chains at [redacted]

Yours sincerely,

[redacted]

Shona Gawel
Chief Executive Officer