

# 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 2:38 PM GMT+10

Response ID:

sbm2fbc141dcd48d55130840

---

- 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  
Virgin Australia
- 4 Confirm that you have read and understand this declaration.  
Yes
- 5 First name  
Anntonette
- 6 Last name  
Dailey
- 7 Email  


- 8 Phone  
[REDACTED]
- 9 Who are you answering on behalf of?  
Organisation
- 10 Organisation name  
Virgin Australia
- 11 What best describes you or your organisation?  
Industry
- 12 What sector do you represent?  
Active transport  
Other: "Aviation"
- 13 What state or territory do you live in?  
Australian Capital Territory
- 14 Postcode  
Not answered
- 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?

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.

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?  
Yes, please see our written submission
- 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?  
Please see our written submission
- 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

233 Redacted VA\_Submission\_Transport\_Net\_Zero.a74a700f.pdf

69 Upload a submission

Not answered

70 Upload supporting file

Not answered

71 Upload supporting file

Not answered



australia

Virgin Australia Airlines Pty Ltd  
PO Box 1034  
Spring Hill QLD  
Australia 4004  
T +61 7 3295 3000  
[virginaustralia.com](http://virginaustralia.com)

6 August 2024

Department of Infrastructure, Transport, Regional Development, Communications and the Arts  
GPO Box 594  
Canberra ACT 2601  
Via email: [NetZero@infrastructure.gov.au](mailto:NetZero@infrastructure.gov.au)

### **Consultation: Transport and Infrastructure Net Zero Consultation Roadmap**

Thank you for the opportunity to provide comments on the development of Australia's Net Zero Plan for Transport and Infrastructure. Virgin Australia has committed to targeting net zero emissions from our operations by 2050, in line with the ambition set by the global aviation industry in 2021 and welcomes the opportunity to engage with the Australian Government as it considers emission reduction opportunities for the aviation transport sector.

Climate change will have an effect on our operations, and we continue to build our capacity to identify, assess, and manage the risks and opportunities it presents to our business. Our priority is to provide a safe, sustainable, and reliable air transport network – at an affordable price.

Sustainable aviation fuel (SAF) is the key lever for aviation decarbonisation. It does, however, remain economically challenged with current global prices between two and five times higher than conventional jet fuel. With aviation fuel typically representing up to 30% of an airline's cost base, even small increases in fuel costs can have substantial commercial - and air fare - impacts.

We wish to draw the Australian Government's attention to our recent submission to the Department on low carbon liquid fuels as well as our response to the [Aviation Green Paper](#) (section 6). In particular, to reinforce our key overarching principles on this issue as:



- Virgin Australia supports an incentives-based approach to environmental management as it provides greatest flexibility and uptake.
- Any mandate or legislated targets need to be accompanied by a suite of other incentives and measures to drive an economically viable choice.
- SAF represents the greatest opportunity for aviation decarbonisation on long-haul flights given that this is where emissions are highest. Consideration should be given to a focus on international routes in the first instance.
- The National Greenhouse and Energy Reporting (NGER) Act should be expanded to include SAF procured and consumed under a robust national 'book and claim' system (with international reach). 'Book and claim' is the most efficient and cost-effective way for airlines to access SAF, especially given the significant cost differential between SAF and conventional jet fuel.

One of the most significant steps we've taken is our investment in fleet renewal. We are introducing newer, more fuel-efficient, and quieter aircraft as part of our transformation strategy. Our new generation 737-8 aircraft are 15 percent more fuel-efficient and 40 percent quieter compared to the 737-800 NG fleet. Virgin Australia has made a commitment to [39 new more efficient aircraft](#), of which seven have already been delivered.

The aviation sector will continue to be an area of growth. The ACCC identified in May 2024 that the sector has already returned to pre-pandemic levels of travel in its [Domestic Airline Competition in Australia](#) report. Even with the growth of videoconferencing, the requirement to travel for business and personal reasons continues. Due to Australia's geography and vast distances between main population centres, the most efficient form of travel remains via air transport. As highlighted in the Airlines for Australia & New Zealand submission, the aviation sector contributes significantly to the Australian economy.

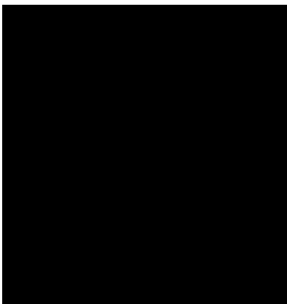
Further, according to the June 2024 Ipsos Issues Monitor<sup>1</sup>, 'cost of living' remains the issue of greatest concern to Australians. With travel, particularly in regional communities, seen as a necessity rather than a luxury, the costs of flights should be seen as a cost-of-living measure.

The scale-up of SAF will be critical to ensuring that aviation is able to meet its decarbonisation objectives. However, care must be taken to introduce policy mechanisms that do not challenge the long-term availability of affordable aviation services for the Australian community. While the Safeguard Mechanism sets out the decarbonisation trajectory required, the sector is likely to need to combine several measures to achieve it – including energy efficiency improvements, the use of high-integrity carbon offsets and SAF. Appropriate action by Government will help ensure that SAF makes up a larger portion of the trajectory than the other levers.

Should further clarification be needed, please contact   


Thank you once again for the opportunity to contribute to this consultation and we look forward to your feedback.

Yours sincerely,



---

<sup>1</sup> Ipsos Issues Monitor, June 2024 results released on 15 July 2024, accessed: <https://www.ipsos.com/en-au/issuesmonitor>