

25 October 2019

Submission from the Bioenergy Association

Subject: A Vision for Hydrogen in New Zealand – Green Paper, Ministry for Business, Innovation and Employment

1. The Bioenergy Association is concerned that the discussion on hydrogen is being undertaken without reference to other options. Hydrogen can have a role in the New Zealand economy but it should be in terms of proper and full analysis of all energy supply and demand options.
2. The bias that is currently being shown for hydrogen is disproportionate to the work that should be undertaken on other options such as gaseous and liquid biofuels.
3. The level of investment of public funds that is being proposed for hydrogen would have a better financial return if spent on proven energy technologies such as is available from bioenergy and biofuels.
4. Producing green hydrogen will require the construction of large amounts of additional electricity generation capacity and this has not been taken into account in the presented discussion.
5. It is inefficient to be producing one renewable energy source such as electricity or biogas and to use that to produce hydrogen, with the efficiency losses from conversion, compared to using those renewable energy sources directly.
6. The quality of analysis is way below the standard of analysis which should be undertaken on any of the energy options.
7. The discussion on hydrogen should be considered as part of a proper and full strategy on how the energy sector can contribute to reducing greenhouse gas emissions. Isolated analysis such as has been done for hydrogen will produce distorted results and lead to inappropriate and unnecessarily costly public policy decisions and investments.
8. The Bioenergy Association would be willing to participate in a full sector analysis rather than wasting effort on ad hoc decision making such as is being done for the hydrogen option.

Regards



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