

1 July 2022

Consultation: Sustainable Biofuels Obligation
Energy Markets Policy
Building, Resources and Markets
Ministry of Business, Innovation and Employment
PO Box 1473, Wellington 6140
New Zealand

By email: energymarkets@mbie.govt.nz

The Sustainable Biofuels Obligation: Proposals for Regulations

Dear Ministry of Business, Innovation and Employment

Thank you for the opportunity to provide feedback on the Sustainable Biofuels Obligation: Proposals for Regulations.

Auckland Transport (AT) supports the rapid decarbonisation of the transport system, and we consider that biofuels have an important role to play in this transition. We commend the Ministry for initiating work on biofuel regulations, which in our view will accelerate the shift to more sustainable transport fuels.

Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan aims to reduce 64% of transport emissions in Auckland by 2030. AT aspires to contribute to this target by transitioning our PT services to low emissions services by 2030 (including through the AT low emissions bus roadmap-2020).

We see a potential opportunity for biodiesel (in particular renewable diesel) to further contribute to reducing greenhouse gas emissions in the transition period to low emissions public transport services. We believe that the biofuel mandate supports achieving these regional efforts of emissions reduction.

However, we also understand that biofuel production can possess significant environmental and social risks (impacts on food, water, forest, monoculture, genetic and invasive species, concentration, habitat loss on biodiversity, land clearance etc.).

Therefore, we support the intention to develop and assess biofuel supply against sustainable criteria to ensure ethical sourcing of the supply chain and to minimise adverse environmental and social risks. We believe that the regulatory measures would help ensure that the mandate does not trigger the substitution of food crops for fuel, the endangerment of clean water supplies, the deterioration of land, nor the inequitable distribution of profits on biofuel production at both



domestic and international levels. We believe that certification of the lifecycle emissions of biofuel needs to be transparent, accepted by GHG auditors and not materially add to fuel cost.

AT would welcome the opportunity to discuss biofuel provisions with the Ministry. AT has developed significant expertise in the implementation of more sustainable transport operations and are happy to share our experiences with you.

We thank the Ministry for this opportunity to submit and look forward to working with our partners to achieve shared decarbonisation objectives.

Kind regards

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Auckland Transport