

Increasing the use of biofuels in transport – Consultation Feedback

1. A GHG emissions reduction mandate is good in principle
2. I do support certification in New Zealand using international standards so that we are measured against the global standards that others will likely be using instead on making some in New Zealand that may not be fit for purpose
3. I do support applying the mandate to all liquid transport fuels to incentivise those making the biofuels to have access to a large enough market but it is not clear in the document how this will impact on the light vehicle fleet
4. The deadline of 2023 start date is unlikely for New Zealand due to the time taken to get consent, investment and cross over hurdles in order to start producing biofuels (many of these reasons are outlined in the initial part of the document as to why it hasn't taken off already in New Zealand)
5. In principle, separate reduction percentages may be effective if some fuels have the potential to have more impact than others in terms of volume of emissions but this is an uneducated comment
6. Provisional reduction percentages seem reasonable, albeit noting the comment at 4. above
7. I support producers being certified against a sustainability standard as long as the standard is recognised and validated internationally
8. I support labelling to inform consumers as long as it is not greenwashing, as you will lose credibility and trust with consumers
9. Definitely need to overcome challenges New Zealand biofuel producers face including:
 - a. Support with funding CAPEX
 - b. R&D funding to develop products
 - c. Researchers with capability to create products
 - d. Test facilities for certification (using international best practice/standards)
 - e. Pilot plant facilities for trialling products
 - f. Ways to reduce costs of getting feedstock around the country to biofuel plants
 - g. Ways to ensure feedstock is reliably supplied (many feedstocks may be diverted to higher value opportunities)
10. Unsure on volumes per year to target as this is not my area of expertise, as well as the calculation for emissions
11. Limit the amount of hurdles companies need to jump over in order to comply as you want to incentivise people to invest in biofuels – at the moment, the document focuses on more sticks than carrots, so incentives may be more effective but with obvious penalties for reporting offences/greenwashing, as this will be necessary

