



2 November 2023

Energy Resources Markets Branch
Ministry of Business, Innovation and Employment
15 Stout Street
PO Box 1473, Wellington 6140

Attention: Gas Transition Plan Issues Paper submission

Dear Sir / Madam

Gas Transition Plan Issues Paper – The Role for Biogas

The Gas Transition Plan and National Energy Strategy present an opportunity to prepare New Zealand's energy sector for the transition to a lower emissions future. Looking at the energy sector in isolation would miss the chance to take advantage of solutions that will help to solve multiple challenges at once. Biogas is one such solution.

To better understand how biogas can contribute to our national objectives; Ecogas, Powerco and Firstgas commissioned Blunomy to help articulate what a future would look like where we make a significant commitment to developing our biogas resources - and how that future would achieve targets across the energy, waste and agriculture sectors. The final report from this work is attached and we believe provides a useful input to the Gas Transition Plan and National Energy Strategy.

The key considerations for the Gas Transition Plan are:

- **Significant potential exists to reduce emissions from gas use through biogas.** This is not a niche solution, with biogas contributing nearly 10% of the effort required to achieve the target of reaching 50% renewable energy by 2035.
- **A network of regional AD facilities is a viable way to realise this potential.** This approach maximises available feedstocks while minimising the costs in moving waste – and takes advantage of access to existing gas infrastructure in the North Island.
- **Coordinated action is needed to realise this vision.** Circular economy solutions like biogas rely on systems-thinking to succeed. In the case of biogas, this requires coordination across the energy, waste and agriculture sectors to fully account for the benefits that biogas development will provide in New Zealand.
- **Realising the proposed vision means promoting New Zealand's relevance as a global contributor to emissions reduction, sustainable food production and innovation.**

We are happy to meet with officials to discuss this work further and how the recommendations in the report can best be implemented.

Naku noa na