Jet Zero Australia Level 20, Greenwich Office Australia Square 264 George St Sydney NSW 2000 <u>www.jetzero.com.au</u> (02) 9199 5555



SUBMISSION ON THE COMMONWEALTH GOVERNMENT AVIATION GREEN PAPER

On behalf of Jet Zero Australia (Jet Zero), we would like to thank you for the opportunity to comment on the Aviation Green Paper, led by the Department of Infrastructure, Transport, Regional Development, Communications, and the Arts (DITRDCA) on behalf of the Commonwealth Government.

Jet Zero Australia welcomes the Aviation Green Paper's themes, in particular "Chapter 5: Maximising aviation's contribution to net zero" through Sustainable Aviation Fuel (SAF).

SAF is the Aviation Industry's Decarbonisation Solution

Australia is part of an aviation global ecosystem which is critical in connecting our widely dispersed population domestically and enabling overseas transportation and freight. To decarbonise the hard-to-abate aviation sector, airlines will need to use SAF as their main lever to meet their decarbonisation targets. While electric and hydrogen aircraft technologies may be promising for future short haul flights, SAF is the only pathway for significant emissions reduction in the aviation industry for long haul flights before 2050, making up 65% of the International Aviation Transport Association's (IATA) pathway to net zero. Jet Zero emphasises that there are no other proven and commercial technologies available for achieving significant emissions reduction in aviation other than SAF, providing a reduction of up to 80% emissions across the life cycle when compared to conventional jet fuel. SAF is an immediate feasible solution for decarbonising aviation because it can be easily substituted as a "drop-in" fuel replacement for conventional jet fuel, with no modifications required to aircraft.

Recommendations to Government

- 1. Continue to support domestic SAF producers with capital costs involved with developing new projects.
- 2. Mandate the use of SAF in Australia.
- 3. Incentivise keeping Australian biofuel feedstocks onshore to support the domestic industry.

Table 1: Primary pathway options for decarbonising the aviation sector

Options	%	Description	Challenges

Efficiency	3	Operational and design improvements	Returns from efficiency gains likely to diminish		
gains		that reduce conventional het fuel use	over time		
Hydrogen	13	Combustion of low emission hydrogen and/or conversion to electricity via fuel cells	Requires new aircraft designs and cryogenic storage capacity. Long time to develop, ensure safety, certify and commercialise, and likely to be limited to short haul markets		
Battery		Electric propulsion powered using green or zero emission electricity	Battery weight and size constraints likely to limit service to short haul markets. Reliant on high renewable energy penetration in the grid		
Offsets	19	Investments in permanent out of sector CO2 emission reduction or removal	Serves as a short to medium-term solution until other decarbonisation solutions can be developed. Concerns about "greenwashing" and uncertainty around offset integrity and actual emissions reduction		
Sustainable Aviation Fuel	65	Fuels produced from sustainable resources with similar physical and chemical characteristics as conventional jet fuel, with 'drop in' quality allowing use in existing aircrafts	Will be the primary decarbonisation solution over the next three decades. Large support from government and industry is needed to get the scale to meet the level of demand		

The SAF industry is poised for significant growth, with 290 member airlines of the IATA committing to net zero emissions by 2050. This includes Australia's largest carrier, Qantas, who has also committed to buying 500 million litres of SAF by 2030. In 2022, over 300 million litres of SAF were produced, making up only 0.1% of total jet fuel used globally. Achieving IATA's net zero target will require the mitigation of 21.2 gigatons of carbon between now and 2050, with at least 65% or 449 billion litres forecast to be necessarily abated through SAF.



Figure 1: Global SAF Demand Forecast (Source: EU and US commitments, IATA)

The Australian private sector will most likely be the primary driver of renewable and alternatives fuel demand over the next few years. This trend has occurred in Europe and the US as companies aim to meet their decarbonisation targets. The figure below demonstrates the strong current demand for SAF from airlines, airports, corporate buyers and OEMs, which is only set to grow as further countries and airlines make net zero commitments.



Figure 2: Aviation members agree to 10% SAF by 2030 (Source: RBC Capital Markets based on World Economic Forum)

Jet Zero Australia's strategic vision

Jet Zero Australia is leading the domestic industry in commercialising SAF production, with plans progressing to develop Australia's first Alcohol to Jet Fuel (ATJ) facility, taking surplus ethanol production on Australia's East Coast and converting it to SAF in a plant in Queensland that will commence construction in 2024/25.

Australia is well positioned to benefit from the production of SAF from the ATJ process. Australia already holds the most certified organic agricultural land area in the world, producing surplus volumes of sustainable ethanol from both wheat and sugarcane molasses.

Australia is the second biggest emitter of carbon per capita on domestic air travel, and over half of Australia's leading companies have committed to net zero targets. Importantly, SAF can not only play a major role in fully decarbonising aviation but also it also offers other benefits including reduced local air pollution and considerable employment opportunities. Unlocking this potential will require significant new investment and long-term policy frameworks to jump start this infant industry.

Production pathways and feedstock selection

The SAF industry now has several technological pathways that have been developed or are under development (Table 2). The producers listed below are all located offshore.

Pathway	Status	Feedstocks	Description	Blend limit	Potential GHG reduction	Producers
Fischer Tropsch Synthetic Paraffinic	Commercial	Biomass, forestry wastes, agricultural wastes, energy	The gasification of biomass materials to produce syngas, which is transformed into	50%	85-94%	Fulcrum, Velocys

Table 2: Major SAF Technological Pathways summary

Kerosene (FT- SPK)		crops, municipal solid waste	kerosene using Fischer- Tropsch synthesis			
Hydro- processed Esters and Fatty Acids (HEFA)	Mature	Vegetable oils, animal fats, waste oils, non- food oil crops	Processing of lipid-based feedstocks using hydrogenation and isomerisation to convert it to long chain hydrocarbons	50%	73-84%	Neste, ENI, World Energy
Alcohol to Jet (ATJ)	Commercial	Corn, grains, sugarcane, sorghum, lignocellulosic biomass, agricultural residue.	Processing of shorter chain alcohols via dehydration, hydrogenation, oligomerisation, and hydrogenation	50%	85-94%	LanzaJet, Gevo
Catalytic hydro- thermolysis jet fuel (CHJ)	In development	Triglycerides such as soybean oil, jatropha oil, camelina oil etc	Involves the hydrothermal conversion and hydrotreating using subcritical water to convert waste fats, oils and greases into jet fuel	50%		ARA, Euclena
Hydro- processed Fermented Sugars (HFS)	In Development	Biomass used for sugar production	A biological conversion of biomass to jet fuel, also known as synthesized iso-paraffins from hydro-processed fermented sugars (SIP)	10%		Amyris
Power to Liquid (PTL)	In development	Industrial off gases or atmospheric carbon dioxide	Utilising green hydrogen and avoided/removed carbon dioxide to make kerosene		Up to 99%	Sunfire, Caphenia, Honeywell

Diverse SAF production pathways are required for the smooth transition of the aviation industry to SAF, with a timeline of technology pathways versus cost detailed in Figure 3. The low capital cost technology of HEFA, technology maturity and good yields make it the most attractive near-term solution for SAF, in addition to the existence of brownfield sites which can be repurposed to produce SAF. However, it is likely that the feedstock for HEFA plants will become scarce and the competition for the feedstock will drive up the price as demand for SAF increases. FT and ATJ are viable medium-term solutions that consider a wider range of feedstocks which are reasonably priced to produce SAF. ATJ relies more on first generation feedstock sources such as sugarcane, sorghum, and corn for ethanol to produce SAF, however as the technology develops and is de-risked, it is likely that second generation feedstock sources will become more common. FT can process a wide variety of feedstocks but is better suited to drier materials with higher content, such as forestry residue and municipal solid waste, however it is limited by the high capital investment required. Power-to-liquids (PTL) or e-fuels is an emerging technology that uses electrolytic H_2 produced from renewable energy and atmospheric CO_2 or captured carbon from industrial processes to make syngas, that can be transformed into jet fuel through Fischer-Tropsch or Di-Methyl Ester methods. However, due to the high cost of hydrogen and carbon removal technologies, this pathway is likely to be commercial after 2050 and serve as a more long-term solution for SAF.

It is important to acknowledge that not all SAF is equal, with the type of production pathway and feedstock used impacting the overall costs and emissions of the product. The emissions reductions are typically higher when using waste residues than first generation feedstocks, as no emissions are attributable to waste sources.



Figure 3: Approximate SAF Technology timeline

The Feedstock Challenge

Q: What are the current and future challenges in developing an Australian SAF production industry, including challenges association with growing, refining, and consuming feedstocks?

The most fundamental barrier to sustainable liquid fuel uptake is the supply and availability of feedstocks to make biofuels. This is due to several factors, including achieving the quantities of feedstock needed for scale, competition for feedstock with other jurisdictions, and competing land use issues. Among the various pathways for producing SAF, the HEFA pathway is most common and mature. HEFA utilizes residue feedstocks such as used cooking oil (UCO) and tallow (animal fats). Interestingly, Australia currently serves as a significant exporter of HEFA feedstock for Neste's SAF plants in Asia, Europe, and the US. Competitive access to Australian feedstocks, resultant from the pricing incentives internationally, is undoubtedly a barrier to the potential for HEFA schemes in Australia.

Australia has the agricultural resources to be a leader in the bioenergy space, with abundant agricultural land and renewable energy technologies. However, a lack of regulatory support has driven producers to largely export biofuel feedstocks to external biofuel markets in the US and Europe, with their strong markets providing premium prices for the feedstock secured. Australian producers require a strong incentive to keep the feedstock onshore and contribute to a domestic SAF Industry, and additional awareness of the benefits of supporting a SAF industry.

Currently, Australia produces approximately 450,000 tonnes of tallow, 22,000 tonnes of used cooking oil, 1 million tonnes of molasses and 6 million tonnes of canola, of which up to 75% of Australian canola and used cooking oil are exported to international markets with pricing premiums. This indicates that Australia has the capability to meet its bioenergy needs and renewable targets. However, the lack of government incentives to retain Australian feedstock onshore has resulted in international fuel targets being prioritized over domestic ambitions for the sector. Additionally, the increasing demand for SAF globally will result in a rising cost curve as feedstock accessibility becomes more challenging to access and transport.

In the absence of any policy that might better level the competitive landscape for Australian feedstocks for the domestic production of biofuels in Australia, it is likely that the significant disparity between Australian and international policy will remain a major obstacle to meaningful local investment in biofuel capabilities. Diversification of agricultural production for feedstocks, high value use of agricultural product particularly. Onshoring of feedstock is important.

Government policy support for scaling SAF

Q: Should policy and regulatory settings be refined to support development of domestic SAF production capability and industry take-up of SAF?

Policy and regulation will trigger investment by providing a strong demand signal to the private sector that SAF is a key solution for the Australian Government in meeting its target of 43% reduction by 2050. While there is strong demand from the industry for SAF, the high capital costs, unstable feedstock supply and lack of a supportive Australian policy environment deters private industry investment. For those first movers, such as Jet Zero, a lot of capital and technical risk is taken to establish this new and emerging industry, and the airlines investing in these projects also take a risk by using their balance sheets to support these projects. For this, government subsidies for those who invest in the industry are important to bridge the cost between SAF and conventional jet fuel to make it more cost effective for airlines who are working to reduce their emissions.

Around the world, countries with strong regulatory landscapes have a high uptake in SAF production and usage. Most airlines and countries with SAF commitments have mandates of 10% SAF by 2030, to stimulate demand. From that, incentives are established to stimulate supply, usually in the form of tax or fuel credits, with the most noteworthy scheme being California's Low Carbon Fuel Standard (LCFS), which provides tax credits for those below a baseline that can be traded and allowing additional stacking of benefits. **The main supply levers to stimulate SAF production comes from government investment.** The corresponding demand level is corporate and passengers focusing on reducing their Scope 3 emissions.



Figure 4: SAF Policy announcements internationally

Utilising average SAF prices across each region (found in public domain) and converting on the assumption of a fuel density of 825 kg/m^3 and conversion cost of \$1 USD to \$1.51 AUD, the costs of SAF around the world are presented in Table 3. SAF is two to three times more expensive than conventional jet fuel across the US, EU and globally. However, it is clear that in the EU and US where subsidies and mandates are present, the selling price of SAF is lower than the global average selling price.

United States	Europe	Globally	Conventional jet fuel
\$9.39 USD/gallon	\$2020 USD/tonne	\$2437 USD/tonne	\$924.84 USD/tonne
\$3.746 AUD/L	AUD \$3.68 AUD/L	\$4.46 AUD/L	\$1.693 AUD/L

Table 3: SAF Price comparison for regions with mandates,	global price and conventional jet fuel
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Q: How can Government work with industry to ensure a strong and sustainable aviation sector that supports emissions reduction targets while growing jobs and innovation?

It is time to showcase **Australia's ability to pivot with speed** and join the growing number of countries implementing policy initiatives that are supporting a burgeoning SAF industry that is well on its way to reducing aviation emissions and fostering knowledge and innovation leading to jobs growth in the booming renewables sector.

In Australia, a mixture of both demand side ('carrot') and supply side ('stick') initiatives need to be utilised. A good case study for demand side initiatives is the French SAF mandate. The French government has proposed a biofuel blending mandate that aims to ensure a minimum share of SAF in aviation fuel. According to the proposal, starting from 2024, a 1.5% SAF blending requirement would be implemented, which is set to be increased to 2% by 2025, 5% by 2030 and 50% in 2050. Jet fuel sold that does not incorporate 1% of SAF will require suppliers to pay a penalty. This mandate is driven by the need to reduce GHG emissions, enhance energy security and support the development of a sustainable aviation industry. **This mandate stimulates investment and innovation in the biofuel sector, fostering economic growth and job creation.** A challenge to consider in this scenario is the

scalability of SAF production to meet the growing demand. Accessibility to Australia's abundant local feedstock needs to be addressed to maximise the full potential of the biofuel industry.

One of the most notable case studies for supply side incentives is the Low Carbon Fuel Standard (LCFS), which sets annual carbon intensity standards based on the life cycle emissions for fuel producers to meet. Any fuels below the baseline receives credits, and those above have deficits in which they need to purchase credits to meet their carbon intensity standard. This standalone market provides a strong demand signal without any revenue to or payments by the government, with an established market for credit transactions having a total value exceeding \$2 billion USD in 2018.

In the UK, the Government subsidises every litre of SAF lifted from commercial airports. Per the UK system, every foreign airline has access to subsidised fuel at the expense of the UK taxpayer. Jet Zero sees benefit in a subsidy system but feels the UK system is not effectively targeted. Jet Zero takes the view that primary challenge in the establishment of a SAF industry is the task of mobilising very large equity and finance for the immense investments in production capacity that will be required over the coming 30 years. In seeking to de-risk such investments, thereby encouraging equity investors and debt agencies to allocate capital accordingly, Jet Zero believes that a subsidy model would be much more effective if it directly supported those that take the balance sheet risk on such projects. Most often, it is the long-term off-takers of SAF that are most critical to a project's bankability. Yet in committing to buy SAF at a premium, they run the commercial risk that the cost of their fuel mix might become uncompetitive against those using fuels with less or no SAF. De-risking such off-take commitments through a system of subsidy might well prove a strong policy model to support growth of a domestic SAF industry.

Like the current EU mechanisms which issue fines for not meeting the set mandates, a tax could be applied to fossil fuel producers to subsidise the cost of the growing SAF industry. This supports the transition into SAF and encourage large kerosene producers to move towards the decarbonisation of liquid fuels.

SAF demand is being constrained due to higher SAF costs compared to its fossil counterpart. While offsets may be cheaper than SAF, there needs to be more economic incentivisation to both produce SAF and to move the big companies towards using SAF. With many countries and airlines moving to make SAF commitments, Jet Zero stresses the urgency of the need to have mandates, with Australia's regulatory environment supporting fast moving action through amendments to existing policy or utilising financial incentives or subsidies. As seen internationally, when mandates or targets are announced by government or financial support is injected into the market, the industry can organically develop to meet the rise in demand from government and private industry. Additionally, similar to California, the ability to stack benefits and credits is important in supporting this new industry.

Economic Benefits and transforming Australia's workforce in the transition to net zero The scaling up of SAF will also have a profound effect on employment opportunities by unlocking job creation from plant investment, such as construction and engineering, operations, and maintenance as well as jobs associated with suppliers of equipment, energy, feedstock and other upstream activities. Other opportunities which will emerge are the need to:

- Build and develop teaching pathways with Universities and TAFEs to upskill the future workforce in the transition to renewable energy technologies.
- Pull together a network of PhD students to work with education providers in the region of interest to extend supply chain analysis techniques and tools.
- Provide local training centres for skilled and specialised jobs and guiding fossil fuel workers to be upskilled in the renewable sector.
- Increase refining capacity in Australia again

The benefits of developing an Australian SAF sector are also hugely represented in regional and rural economies, with the creation of a local sustainable fuel supply for the aviation industry projected to increase employment by an estimated 12,000 jobs by 2030.

Domestic SAF production is an industry and national priority

If the Commonwealth Government was to deliver meaningful, strategic policy and funding support to industry in the development of an onshore SAF sector, Australia could realise the following significant, strategic benefits:

- Delivery of significant emissions reduction to Australia's most emissions-intensive transport sector
- No requirements for fleet modification, even when blended at higher percentages with traditional jet fuel
- Globally proven and regulated technology with over 375,000+ SAF fuelled flights safely made around the world since 2008
- Significant upstream economic benefits to the agricultural sector, without competing with food sources
- Enhanced fuel security for both our civilian and military aircraft when compared with imported jet fuel.

Jet Zero Australia is at the intersection of engagement with the airlines, airports, fuel suppliers, growers, private equity, and policymakers to ensure that all stakeholders are able to work together in realisation of this new SAF sector. However, the future of the industry is highly reliant on the direction of government policymaking, particularly when we consider the emissions reductions targets both the Commonwealth Government and the major airlines have to achieve in the next seven short years until 2030.

Like any emerging industrial sector, the initial volumes produced will likely be more expensive than the alternative, and that is no different with the contrast between SAF and traditional jet fuel. Hence one strategic objective of the Aviation White Paper must be how should the Commonwealth Government use the full range of policy tools at its disposal to fast-track volumes of SAF production capacity that meet, at a minimum, our own domestic aviation requirements, and hence reduce the per litre production cost and reduced ongoing requirement for subsidisation.

If Australia does not act urgently on developing significant onshore production volumes of SAF, there is a risk that the emerging international competition will result in the high-quality biomass we produce here will be shipped offshore for SAF production elsewhere. This will

result in Australia being reliant on SAF produced offshore and sold back to us at a premium, and our country missing out on the skilled jobs, technology, and capital investment.

National Fuel Security

A domestic SAF industry would also have significant benefits to mitigate the sovereign risks associated with national fuel security. In recent years, the Federal Government has elevated a focus on national fuel security, reflecting an increasing gravity in the risk assessment, through its program of initiatives, largely targeted at support for fuel infrastructure and fossil fuel refining. Equally, a more progressive view of mitigation options, may well conclude that support for a domestic bio-fuel industry (including SAF) would represent a entirely more effective, comprehensive and enduring solution to national fuel security.

Under the Commonwealth's *Liquid Fuel Emergency Act 1984*, users of large volumes of liquid fuels need to provide contingency plans in the event of a fuel shortage. This includes the defence services, fire and rescue services, and public transport services. By creating a domestic SAF industry, Australia could be more secure with onshore production of biofuels.

Reporting, Certification and Traceability

Q: What types of arrangements are necessary to support industry confidence in the quality standards and sustainability certification of SAF?

Certification

All sustainable aviation fuel must be compliant under the Carbon Offsetting Reduction Scheme for International Aviation (CORSIA). To be CORSIA compliant, fuel must be certified using either the Round Table on Sustainable Biofuels (RSB) method or the International Sustainability Carbon Certification (ISCC) method. CORSIA prescribes a stringent set of criteria that these Sustainability Certification Schemes (SCS) must fulfil to become recognized and certified as a CORSIA eligible fuel. Both the RSB and ISCC method, use a chain of custody approach, are internationally recognized and rigorous in ensuring the entire supply chain from well to wake is certified as sustainable. As a result, when planes fly with SAF, all stakeholders can be assured that every participant in the supply chain has been certified and the data surrounding the lifecycle assessment has been scrutinized to the highest standard. As the industry moves forward, it would benefit the Australian stakeholders in the SAF industry to be able to use specific Australian default values, applied by ICAO, to help calculate the overall lifecycle emission value.

Sustainability certification ensures:

- 1. Transparent compliance of feedstock with a defined set of robust sustainability requirements
- 2. Traceability of sustainable material through SAF supply chains
- 3. Verified reductions in GHG emissions of the final SAF



Figure 5: Sustainability certifications addressing each component of the SAF supply chain

Q: What are the benefits and risks associated with updating the NGER scheme and/or other policy mechanisms to enable unique claims on SAF sourced through common infrastructure? How can risks be managed?

Reporting

Emissions will need to be reported in parallel with both the domestic NGER scheme and the ICAO CORSIA scheme to avoid the risk of double counting. It is important there is alignment between the ICAO CORSIA scheme and the NGERS and Safeguard mechanism. Accuracy of data through 'gold standard' certification schemes and transparent reporting overseen by third parties will reassure all stakeholders that emissions claims are accurate and any benefits through carbon avoidance are clearly justifiable and allocated correctly.

ESG reporting has become as important as financial disclosures. The ACCC and ASIC must oversee and continue to audit companies where questionable ESG claims are made to action compliance and punish greenwashing companies.

Technology & Traceability

Australian sugar farmers are well equipped with the right technology to measure carbon and participate in the full traceability of the final product. Since 2017, KPMG has been engaged with the Queensland Sugar Industry to create an incentive and reward mechanism for growing and sourcing sustainable sugar. Under the tool "KPMG Origins", provenance data can be captured which allows for the tracking and tracing of the flow of materials, data, and interactions across the complete supply chain. Furthermore, in the 2023-24 Budget, A\$38.2 million was provided for the creation of a "Guarantee of Origins" scheme to certify biofuels and track and verify emissions.

SAF Awareness and Education

Q: How can the Australian Government ensure all emitters in the aviation sector play a role in meeting Australia's emissions reduction targets?

There needs to be an effort across the aviation sector to increase awareness and education of SAF. This is particularly true given that SAF mandates and policies already exist in international airlines and companies that fly to and from Australia. Australia is in the unique position where there is enough land for both fuel and food, mitigating the "food vs fuel" debate. SAF production can also bolster existing agricultural industries, such as sugarcane, farming, and forestry by providing diversification of revenue streams and investment. This has been acknowledged by the Queensland Government in their recent biofuels initiative. It is important to reframe the narrative of competition and show that the food and fuel industries can work together.

To complement this, the Queensland Canegrowers Association have launched their "Sugar Plus" vision, which aims to position the sugar industry as fuelling the "Future of Food, Energy and Fabrication". The Queensland Canegrowers Association represents the state's second largest agricultural export, raw sugar, involving 400,000 hectares of farmland, 23,000 direct and indirect jobs and contributing around \$4 billion to the supply chain GDP.

The "Sugar Plus" vision aims to support the production of value-added products, such as SAF, to generate better returns and create new revenue streams for its members. Canegrowers have identified the bioeconomy as an enormous opportunity.

A key takeaway from this bioethanol experience is that it is important for government to consistently enforce these mandates and provide support on the supply side to generate momentum within the market. Additionally, it is crucial that there is education and awareness around the mandate or policy prior to the implementation to ensure that consumers are aware of the benefits of the product, where in this case many consumers believed that blended ethanol in petrol can cause damage to car engines. Awareness around the environmental benefits of SAF will be critical in the uptake of liquid fuels by consumers, especially considering the pricing premium that comes with the fuel.

Risk of Inaction

Australia has a limited window to decide if it wants a domestic SAF industry and how best to foster its growth. With other jurisdictions establishing or having already established SAF initiatives, Australia risks being left behind or even shunned in a fast-moving SAF industry. In the absence of policy incentives, there is a genuine risk that Australia continue along its traditional paradigm as a supplier of raw materials to the world, but left unable to capture the strategic benefits of local manufacturing in economic development, jobs and domestic fuel security. It is Jet Zero's view that the case for a domestic SAF industry is compelling, driving the need to establish a suite of domestic policy or regulations in Australia that incentivise domestic SAF production. Many options might be considered including demand side policies such as mandates and tax exemptions on SAF, or supply side policies such as tax credits for SAF producers or subsidies to those that take the risk in funding the growth of SAF facilities.

If the Federal Government were to deliver meaningful policy support to develop a domestic SAF industry, Australia could capitalise on the:

- Delivery of significant emissions reduction to Australia's most emissions-intensive transport sector without requirements for fleet modification.
- Support of a diverse portfolio of SAF production pathways to ensure long-term emissions reduction towards Australia's emission reduction targets.
- Significant upstream economic benefits to the agricultural sector, with Australia's large land capacity able to provide both food and fuel.

- Enhanced fuel security for both our civilian and military aircraft when compared with imported jet fuel.
- Unlocking of economic opportunities by transitioning Australia's workforce towards renewable technologies.
- Strong reporting, certification and traceability that supports industry confidence in the sustainability credentials of SAF.