

15 December 2023

Director, Aviation White Paper Project Office

Via email: aviationgreenpaper@infrastructure.gov.au

Dear Director

Aviation Green Paper

Thank you for the opportunity to provide a submission in response to the Aviation Green Paper.

I note that the government is developing the Aviation White Paper in parallel with the development of the Transport and Infrastructure Net Zero Roadmap (the Roadmap) as part of a whole of economy plan to reach net zero emissions. The development of the Roadmap will provide an opportunity for the government to further consider issues raised in the Green Paper in the context of net zero plans for the transport sector as a whole and the wider economy.

The following issues warrant further consideration in the White Paper and the Roadmap:

- Multiple uses for limited biofuel feedstocks – the aviation sector will be one of several sectors that will have a growing demand for biological feedstocks for alternative, low emissions liquid fuels. These fuels include sustainable aviation fuel (SAF) and also biofuels for land transport vehicles, ships and mine haulage vehicles. There will also be competition for feedstocks for important non-fuel uses, particularly food production and biosequestration. The White Paper and Roadmap should consider demand for biofuel feedstocks at the national level and the most efficient and effective application of those feedstocks for reducing Australia's emissions and other purposes.
- Certification of renewable fuels - A robust framework for certification of renewable fuels (including lifecycle emissions), will be important for ensuring appropriate and accurate recognition of the impact of the use of renewable fuels. This will help avoid adverse and/or unintended impacts such as, for example, emissions intensive SAF production and use and the production of SAF using fossil carbon inputs such as plastic. The authority's forthcoming 2023 review of the National Greenhouse and Energy Reporting (NGER) Act considers these issues in detail.
- International aviation emissions - The White Paper and Roadmap provide an opportunity for the government to clarify its goals for reducing emissions associated with international flights to and from Australia. In this context, the authority notes ongoing work of the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), including setting a baseline for the industry at 85% of the 2019 emissions level of international aviation.

In 2024, the authority will be providing advice on technology transition and emissions pathways for the transport sector as part of its sectoral pathways review to inform development of the government's Net Zero Plan. The review is due to be completed by 1 August 2024. The authority will also be providing advice on emissions reduction targets for Australia's next Nationally Determined Contribution (NDC).

The authority looks forward to engaging further on aviation's role in reaching net zero emissions in Australia.

Yours sincerely



Brad Archer
Chief Executive Officer