

Submitter information

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MBIE and MoT would appreciate if you would provide some information about yourself. If you choose to provide information in the section below, it will be used to help MBIE and MoT understand how different sectors view the Sustainable Biofuels Mandate proposal. Any information you provide will be stored securely.

Your name, email address, phone number and organisation

Name:

Mark Edwards

Email address:

[REDACTED]

Withheld under section 9(2)(a)

Phone number:

[REDACTED]

Organisation:

NZ Rock lobster Industry Council

- The Privacy Act 1993 applies to submissions. Please tick the box if you do **not** wish your name or other personal information to be included in any information about submissions that MBIE and MoT may publish.
- MBIE and MoT may upload submissions and potentially a summary of submissions to the website(s), www.mbie.govt.nz and/or www.transport.govt.nz. If you do **not** want your submission or a summary of your submission to be placed on either of these websites, please tick the box and type an explanation below:

I do not want my submission placed on MBIE's website and/or MoT's website because... [insert reasoning here]

Please check if your submission contains confidential information

- I would like my submission (or identifiable parts of my submission) to be kept confidential, and **have stated** my reasons and ground under section 9 of the Official Information Act that I believe apply, for consideration by MBIE and MoT.

Sustainable Biofuels Mandate

How the Sustainable Biofuels Mandate would work

1. Do you support having a GHG emissions reduction mandate?

- Yes
 Yes, with changes
 No
 Not sure/No preference

Please explain your views.

We acknowledge that the biofuels mandate intent is to overcome the market advantages of fossil fuels. However, the effect will be to impose significant additional cost on fuel use in addition to the cost of emission units for fuel purchases through the ETS. We prefer the flexibility provided by the ETS in incentivising reduction in carbon emissions.

It is accepted that New Zealand should take steps to meet our climate change commitments – but this should be achieved by using mechanisms that encourage efficiency overall in the economy rather than by imposing additional changes on some sectors.

Advanced biofuels offer advantages by allowing the continued use of existing combustion engine technologies as well as the environmental benefits. The consultation document notes that ETS emissions prices have to date provided insufficient incentives to increase the use or production of sustainable biofuels. Increased use and availability of biofuels could be achieved by targeted R&D funding.

2. Do you support the proposal to require certification of lifecycle emissions of biofuels sold in New Zealand using international standards?

- Yes, I agree
 I agree in part
 No, I don't agree
 Not sure/no preference

Please explain your views.

[insert response here]

3. Do you support applying the Sustainable Biofuels Mandate to all liquid transport fuel?

- Yes, I agree
 I agree in part
 No, I don't agree
 Not sure/no preference

Please explain your views.

If the biofuels mandate is applied, fuel suppliers should be able to decide where biofuels are best deployed to meet the required percentage emissions reduction. This would allow suppliers to make the most economically rational decisions to meet the requirements.

4. Are the proposed initial emission reduction percentages for 2023–2025 appropriate for New Zealand? If not, what should they be?

- Yes, I agree
 I agree in part
 No, I don't agree
 Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

[insert response here]

5. Do you support having single GHG emissions reduction percentages across all fuel types, or do you favour separate reduction percentages? Why and how many separate percentages would you suggest we have?

- Yes, I agree
 I agree in part
 No, I don't agree
 Not sure/no preference

Sustainable Biofuels Mandate

Is there anything you would like to tell us about the reason(s) for your choice?

One emissions reduction target across fuels would provide suppliers with flexibility to decide on the types and volumes of biofuels they would supply.

6. Do you support provisional emission reduction percentages being set for 2026–2030 and 2031–2035 with the percentages being finalised in 2024 and 2029 respectively?

Yes, I agree I agree in part No, I don't agree Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

[insert response here]

7. Do you support the proposal that biofuel producers must be certified against an established sustainability standard to count towards achievement of the emissions reduction percentage?

Yes, I agree I agree in part No, I don't agree Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

[insert response here]

8. Do you support having a joint fuel industry/government information campaign to inform New Zealanders about biofuels and the Sustainable Biofuels Mandate?

Yes, I agree I agree in part No, I don't agree Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

[insert response here]

9. Do you support the labelling proposal that informs consumers about specific biofuels at the point of sale?

Yes, I agree I agree in part No, I don't agree Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

[insert response here]

10. Should New Zealand try to overcome the challenges that domestic biofuel producers face in maintaining access to affordable supplies of domestically produced feedstocks? Do you have any suggestions for how this challenge could be overcome?

Yes, I agree I agree in part No, I don't agree Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

[insert response here]

Sustainable Biofuels Mandate

How could the Sustainable Transport Biofuels Mandate be implemented?

11. Do you think the minimum threshold for compliance of 10 million litres of transport fuel in a calendar year in New Zealand is appropriate? If not, what level would you change it to?

Yes, I agree I agree in part No, I don't agree Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

[insert response here]

12. Do you agree with the method for calculating a supplier's GHG emission reduction?

Yes, I agree I agree in part No, I don't agree Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

[insert response here]

13. Do you think the annual reporting regime, including its offences and fines, is practical and appropriate?

Yes, I agree I agree in part No, I don't agree Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

[insert response here]

14. Do you support the performance of fuel suppliers being published to enable consumers to reward the industry leaders in reducing GHG emissions?

Yes, I agree I agree in part No, I don't agree Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

[insert response here]

15. Will the proposed penalties encourage fuel suppliers to achieve the required emission reductions? If not, would level should they be?

Yes, I agree I agree in part No, I don't agree Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

[insert response here]

16. Do you support the proposal for fuel suppliers to defer achieving their emissions reductions for years 1 and/or 2, in full or in part, to the following year?

Yes, I agree I agree in part No, I don't agree Not sure/no preference

Sustainable Biofuels Mandate

Is there anything you would like to tell us about the reason(s) for your choice?

Given the current supply issues for sustainable biofuels the deferral would provide more time to address production and supply issues without an overall increase in emissions.

17. Do you support fuel suppliers banking any surplus emissions reductions in a year and using it to reduce the percentage needed to be achieved the following year?

Yes, I agree I agree in part No, I don't agree Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

Yes – this will create incentives for improved performance beyond the requirements.

18. Do you support fuel suppliers borrowing for shortfalls in emissions reductions in a year, and making the shortfall up the following year?

Yes, I agree I agree in part No, I don't agree Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

This will create more operational flexibility without increase in overall emissions.

19. Do you agree with the proposal to allow trading through the use of entitlement agreements?

Yes, I agree I agree in part No, I don't agree Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

Yes – this will create incentives for improved performance beyond the requirements because the investment can be recovered through trading with other fuel suppliers.