

From: Oskar Meijerink [REDACTED] Withheld under s9(2)(a)
Sent: Tuesday, 27 July 2021 4:28 AM
To: Energy Markets
Subject: Consultation: Sustainable Biofuels Mandate
Attachments: A Market Outlook on Sustainable Aviation Fuel - Background Analysis.pdf; WEF_CST_Policy_European_Commission_SAF_2020.pdf; A Market Outlook on Sustainable Aviation Fuel - Summary Report.pdf; Inception-Impact-Assessment-AFF-Final-for-submission.pdf; refueleu_aviation_-_sustainable_aviation_fuels.pdf

Dear receiver,

Regarding the proposed mandate, as a Sustainable Aviation Fuel facility developer and global market leader in the SAF space we are very happy to see governments across the world and now New Zealand specifically, are moving into a direction of mandating the use of renewable fuels. As being based in Europe, we have dealt with such regulatory developments over the past 10 years with the development of the Renewable Energy Directive and more recently the proposed 'Refuel EU Aviation Initiative'. In this light, I would like to share some background documentation that we developed (or supported) over the past years:

1. Inception impact assessment AFF

This document was made by the ART Fuels Forum ([link](#)), which SkyNRG is a member from, as a response to the proposed aviation legislation, during the consultation period for Refuel EU Aviation. Many of the questions you are currently deciding on were also discussed in this report.

2. WEF_CST Policy

Similar as the above, this is a report developed by the World Economic Forum with strong input from SkyNRG. This was also used as input to the European Commission back in October 2020, which has led to the Refuel EU Aviation initiative. Many of the considerations in your questions are tackled in this document and widely supported by players from the aviation industry (page 22 for the signatories).

3. Refuel EU Aviation

This is the proposed legislation in Europe after consultation and leading to a specific mandate for the European Aviation industry. There are very valuable insights in this piece of legislation, including a.o.:

- a. Specific sub-mandates for new technology pathways such as PTL
- b. The buy-out price concept
- c. A solution to tankering problems

4. 'A market outlook on Sustainable aviation fuel' (2021), 2 reports:

- a. Background analysis
- b. Summary report

This report was recently developed internally with SkyNRG to show the effect of the proposed legislation and how this could be fulfilled in terms of new facility developments, including an assessment of feedstock availability and technology readiness.

Besides the above and attached documents, we would like to emphasize two things:

1. Consider a specific mandate for Aviation

- a. SAF will not be able to compete with road transport biofuels, therefore a general mandate will not develop a SAF market, while this is the most difficult to decarbonize sector and therefore the most in need of biofuels. A specific mandate on aviation can help to overcome this issue.

2. Consider a wider mandate on all fuels refueled in NZ, including fuels used on international flights

- a. This will significantly increase the market volume which is essential for a viable supply chain

3. Consider additional supporting schemes / governmental purchase agreements to bridge initial price premiums

- a. Specifically, to cover initial price premium in the beginning and support the development of 'new' technologies which are still at lower TRL.

I would be very happy to provide more detail in a call or in a meeting if necessary.
With kind regards,

Oskar Meijerink

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