25 August 2024

Draft Emissions Reduction Plan 2 consultation
Ministry for the Environment
Wellington
ERPConsultation@mfe.govt.nz

Re: Draft Emissions Reduction Plan 2

Introduction

Thank you for the opportunity to provide feedback on the draft Emissions Reduction Plan 2 (ERP2).

This joint submission provides collective feedback from the Board of Airline Representatives of New Zealand (BARNZ), the New Zealand Airports Association (NZ Airports) and the International Air Transport Association (IATA).

BARNZ represents some 26 member airlines who fly to, from and within New Zealand. It also represents businesses reliant on air connectivity such as ground handlers, catering companies and waste management businesses. We ensure connection of New Zealanders domestically and with the world and facilitate critical import and export trade. This submission presents the consolidated middle ground of views of BARNZ members. Individual member airlines may choose to provide their own submissions to reflect their specific situations.

NZ Airports is the industry association for New Zealand's airports and related business. Its members operate 46 airports that span the country and enable essential air transport links between each region of New Zealand and between New Zealand and the world. Individual airports may also choose to provide their own submissions to reflect their specific situations.

IATA is the global trade association for the world's airlines, representing some 330 airlines or over 80% of total air traffic. Our members include Air New Zealand, as well as a number of foreign airlines who operate services to New Zealand. We support many areas of aviation activity and help formulate industry policy on critical aviation issues.

Collectively we strongly support the Government's efforts to rebuild the economy by doubling New Zealand's exports and increasing productivity. In this regard aviation is

critical to New Zealand. It provides the means for our economic prosperity and social wellbeing. Our viability as a competitive long-haul destination and exporter, our ability to import goods, and the opportunity for New Zealanders to connect with each other and live global lives are all dependent on our ability to effectively transition our aviation system to low emission fuels or renewable energy. Our actions need to be oriented accordingly and align with international efforts to decarbonise the aviation sector.

We note New Zealand, as a member of the International Civil Aviation Organisation (ICAO) has committed to a long-term global aspirational goal of net zero carbon emissions from international aviation by 2050. New Zealand also agreed at the 2023 ICAO Conference on Alternative Aviation Fuels a goal of 5% carbon intensity reduction by 2030 enabled via the use of Sustainable Aviation Fuels (SAF). New Zealand was also a signatory to the International Aviation Climate Ambition Coalition Declaration at COP26.

Ahead of providing feedback on specific questions posed in the consultation material we make the following general comments.

The aviation sector is committed to reducing its carbon emissions

The global aviation industry has proactively recognised the need to decarbonise air travel and is leading efforts in this area. For example, IATA airline members, which include the majority of BARNZ members, have committed to net-zero carbon dioxide emissions by 2050. This target date aligns with the requirements of the Climate Change Response (Zero Carbon) Act.

Domestically, all New Zealand airports are assessing work they can do within currently available technology to reduce carbon emissions within their control, provide the enabling infrastructure for airlines to decarbonise, and contribute renewable electricity for the transition needs of their regions and communities. A number of airports have reached the highest international accreditations for emissions reduction. Airports are also contributing to new technology advances to accelerate decarbonisation, including through electric aircraft and hydrogen partnerships.

Collectively BARNZ , NZ Airports, IATA and our respective members are committed to working collaboratively with a full range of Government and private sector partners to find more sustainable ways to keep New Zealand connected with the world and reach our goal of net zero carbon emissions by 2050.

Our submission speaks to international and domestic considerations

While the ERP2 and New Zealand's Emissions Trading Scheme (ETS) does not include international aviation carbon emissions, our domestic and international aviation markets operate in a complex and networked ecosystem. The critical enabler for reduced international carbon emissions, e.g. viable and affordable Sustainable Aviation Fuel (SAF) also has significant impact on the ablity of the aviation system to reduce domestic carbon emissions. Furthermore, once SAF is in the fuelling infrastructure at our airports it will become part of what fuels international aircraft regardless, in that it cannot be separated.

Hence, while the focus of the draft plan is on domestic aviation, our submission speaks to both international and domestic carbon emission considerations. As noted above, our high dependence as a country on long-haul international aviation routes requires us to have a careful and intentional carbon reduction strategy focused on technological enablement, to avoid the potential for any negative impacts on our international aviation connectivity and associated reductions in our economic growth and productivity.

The draft plan needs to be more proactive to address New Zealand's important aviation carbon emission reduction needs

The increased references to aviation in the draft ERP2, compared with ERP1, are welcome. However **ERP2 needs to be more proactive to address the important need to lower aviation carbon emissions**. It lacks concrete steps supporting the development of enabling policy frameworks on, for example, SAF that are necessary for this to occur. **Any reliance on the Emissions Trading Scheme (ETS) as the primary vehicle to address New Zealand's aviation carbon emissions is an inadequate response. A more forward looking and proactive approach is essential.**

Infrastructure planning, funding and delivery timelines also reinforce the need for more urgency and proactiveness in ERP2 than the current draft contains. Aviation decarbonisation requires significant infrastructure at the 'nation-building' scale, in particular for renewable energy generation. The lead-in times for such infrastructure point to the key challenge we face – that while low-emissions and zero-emissions aviation technology is still being developed, **we are now in the critical ERP timeframe for preparing the infrastructure to support this technology.** Through airports, aviation supports industrial and commercial infrastructure in all regions of New Zealand. This should be leveraged in the ERP not just for aviation decarbonisation but other national transition objectives also.

Recent 2+2 Dialogue outcomes provide the opportunity to enhance the draft plan…

Recognising the need for greater proactiveness in ERP2, **we note the important outcomes of the recent Australia-New Zealand 2+2 Climate and Finance Dialogue**. These include the acknowledgement that **a rapid and effective global response to climate change is needed in this critical decade – which encompasses the timeframe to be covered by ERP2**. In other words, we cannot delay or resort to an approach of waiting until the timeframes to be covered by future plans to take concrete action. Of specific relevance to aviation decarbonisation were the agreements to:

- investigate the conditions required to develop a regional sustainable aviation fuel (SAF) industry and exploration of opportunities for the regional production of SAF;
- invite New Zealand aviation companies and representatives to join the Jet Zero Council, established by Minister Catherine King, to strengthen trans-Tasman expert advice on decarbonising aviation
- engage collaboratively in the development of a Guarantee of Origin scheme for green hydrogen, sustainable fuels, and green metals, to promote trans-Tasman regulatory alignment in the design of net zero product certification schemes;
- through the Sustainable Finance Working Group, facilitate alignment of sustainable finance taxonomy policy where appropriate and discuss emerging sustainable finance priorities, such as transition planning and investment product labelling; and
- further deepen collaboration to deliver outcomes under the Paris Agreement.

We also note that **Dialogue outcomes were endorsed in the joint Prime Ministerial statement flowing from the Australia-New Zealand Leaders' Meeting 2024.** This statement noted that aligning technology, clean energy and sustainable finance policies would encourage trans-Tasman investment in energy transition and welcomed the agreement to deepen collaboration to secure ambitious outcomes under the Paris Agreement. The statement also announced that New Zealand would join Australia in the Climate Club, **to support trans-Tasman industry decarbonisation** and strengthen the Indo-Pacific's voice in this important forum.

We applaud the Government for working with Australia to deliver these outcomes. **They demonstrate the level of commitment required to allow us to work together in a timely manner on the decarbonisation challenges we face** for the long term economic benefit and prosperity of all New Zealander's.

Accepting that these outcomes were delivered after the draft ERP2 was prepared, **they provide an important foundation for the development of a final plan** and an

associated enabling policy framework that will address the concerns with the draft plan we have noted above.

In particular, and aligned with the 2+2 Dialogue outcomes, **and the contents of the joint Prime Ministerial statement that refer to alignment with Australia**, a top priority should be that the New Zealand Government utilises Australia's recent Low Carbon Liquid Fuel (LCLF) consultation process as a basis for consultation in New Zealand. Work should begin now to evaluate the content of Australia's consultation documentation, and any New Zealand analysis that would be needed to adapt it to our context. This process would then be informed by Australia's policy decisions once its consultation is complete, as a basis for New Zealand to either align or diverge from those decisions where this may be appropriate for our context.

… and refocus the activities of Sustainable Aviation Aotearoa

The 2+2 Dialogue outcomes also provide a timely opportunity to **reassess the role of Sustainable Aviation Aotearoa (SAA) and refocus its activity**. Specific shorter term recommendations on this much needed reassessment and refocus are provided in our responses to the individual consultation questions.

A role for Government in facilitating and incentivising investment

We also note the commentary in the consultation material that the Government sees its main role for the aviation and maritime sectors as facilitating industry discussions through existing forums, considering regulatory barriers and ensuring New Zealand's interests are represented appropriately on the international stage. These are important roles and we support such a focus.

However, we believe there remains **a role for Government to also consider the need for robust Public Private Partnership (PPP) or other appropriate co-investment (e.g., the Regional Infrastructure Fund) or incentivisation models** to facilitate the development of a domestic SAF production industry, while protecting any relevant Crown investment. While we recognise a material proportion of New Zealand's future SAF requirements will need to come from overseas, appropriate levels of domestic production will not only deliver economic growth and employment opportunities for regional New Zealand but will also help ensure security and resilience in our aviation fuel supplies.

Appropriate co-investment or other incentivisation models will align economic incentives with the national interest in economic growth and productivity and unlock the private investment at scale necessary for domestic SAF production and the emergence of a credible market in support of climate transition. They will also help

address significant infrastructure challenges and opportunities for some airports, as detailed in our responses to individual consultation questions.

Renewable energy needs

Finally, we note that New Zealand's decarbonisation transition is going to require renewable energy generation at a far greater scale than is currently planned or contemplated. We are concerned that **renewable energy developments are needed at a nation building scale**, and infrastructure timelines require these developments to commence quickly. Consenting processes are not yet ready to facilitate this level of project. More details on these specific matters are provided in our responses to the individual consultation questions.

Thank you again for the opportunity to provide submissions on ERP2. Our responses to the specific consultation questions posed regarding aviation are set out below.

Yours sincerely

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Responses to specific questions

Question 6.5. Do you support the Government proposals to reduce from aviation and shipping?

As noted in our introductory comments **the draft plan requires more proactiveness**. It does not adequately address aviation decarbonisation needs and lacks identification of the required steps to develop an enabling policy framework for this. As commented on above, and expanded on our in response to question 6.7 below, the timely **outcomes of the recent 2+2 Dialogue provide the ideal basis to address this situation.**

Accepting the above we make the following comments on the current draft plan.

Alignment with other countries

We endorse an approach that supports alignment with other countries, noting the global eco-system within which aviation operates, and with Australia in particular (see previous comments and those under question 6.7 below) noting the close connectivity across both countries aviation systems – and noting the Closer Economic Relations/Single Economic Market (CER/SEM) framework. For example, policy to align SAF sustainability standards with Australia will support a regional SAF supply market and the Single Economic Market agenda.

In this regard we note and endorse the contents of the Prime Ministerial statement flowing form the recent Australia-New Zealand Leaders' Meeting 2024 that **aligning technology, clean energy and sustainable finance policies will encourage trans-Tasman investment in energy transition** - **and support trans-Tasman industry decarbonisation.**

The role of Sustainable Aviation Aotearoa

We agree with the emphasis on Sustainable Aviation Aotearoa (SAA) as the body to progress advice on settings necessary to support sustainable aviation fuel supply and uptake – **and emphasise the importance of agencies committing capability and capacity in support of it.**

However there is a need to **reassess the role of SAA and refocus its activity, particularly in light of the recent 2+2 Dialogue outcome**s. This acknowledges that the current SAA model, with minimal resourcing from both the Ministry of Transport

(MoT) and the Ministry of Business, Innovation and Employment (MBIE), and resulting little scope for cross-agency collaboration, is actually slowing the sector's work rather

than accelerating it due to stakeholders waiting for news from SAA before progressing their own decarbonisation plans.

Reflecting this situation we strongly recommend , **in addition to longer term final ERP2 actions**, that Government and agencies:

- rationalise the focus of SAA after initial engagement between New Zealand industry and Australia's Jet Zero Council;
- adopts an urgent timetable (three months suggested) for SAA to:
  - engage with the Jet Zero Council in Australia and evaluate the optimal relationship between the two processes;
  - identify the policy work that is needed for New Zealand to meaningfully engage in the agreed trans-Tasman collaboration areas of regional SAF development and fuel certification;
  - align the work of SAA with the Interim Aviation Council (IAC) to ensure recommendations from SAA are built into wider aviation system policy settings;
  - provide its first report to Ministers; and
  - launch a communications and engagement process to connect with the wider aviation and energy sectors.

This proposed work, while focused on ensuring meaningful progress in the short term, will also need to set the platform for consideration of mid and longer term actions, and support work on identifying demand projections for low carbon emission aviation fuels.

As well as partnering with the Jet Zero Council in Australia, we also encourage the Government to consider an action to partner further with the United Kingdom, due to its expertise and resourcing on zero and reduced carbon emissions aviation.

Representing New Zealand's interests on the international stage in a coordinated and credible manner

As with the global trade agenda, New Zealand will depend on fair global rules and markets for aviation decarbonization. We support a commitment **(including resource wise)** from Government to ensuring New Zealand's interests are represented appropriately on the international stage – including in the International Civil Aviation

Organisation (ICAO). This includes support to global advocacy to appropriately strengthen the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) to improve CORSIA Eligible Fuels business cases and widen supply options at a global policy level, and in the development of New Zealand's updated ICAO State Action Plan for emission reduction that appropriately aligns with the basket of measures adopted by ICAO for emission reduction while recognising any New Zealand's specific circumstances, such as our geographic remoteness.

We are aware that many other States in the Asia Pacific region are well progressed in the development of their State Action Plans. Thus far New Zealand has not made material progress on its Plan.

Furthermore, the ERP correctly highlights important multilateral and bilateral priorities for New Zealand's approach which will require close coordination with Government, agencies, and industry and **a focus on New Zealand's reputation and national interest.** This will require strong and credible leadership with experience in policy and diplomatic channels. This focus is particularly relevant considering ICAO's 42nd Assembly scheduled for 2025 at which, to maintain international credibility, New Zealand will need to be able to point to concrete actions underway to reduce carbon emissions and an associated credible State Action Plan.

Leadership is also needed to progress recent important and valuable commitments made with Singapore and California to explore aviation decarbonisation opportunities.

To leverage the right positioning and momentum across MoT, MBIE and the Ministry of Foreign Affairs and Trade (MFAT) to deliver on these important requirements, the necessary State level international representation could be led by an Ambassador for Aviation Transition who also plays a leadership role in SAA. This approach would closely align with the contents of the draft ERP2 that refer to ensuring New Zealand's interests are represented appropriately on the international stage.

Aviation's connection with wider key policies in ERP2

The integrated nature of our wider transport system means that the aviation system has a key role in many of the central policies highlighted in the draft ERP. We strongly recommend that aviation stakeholders are integrated into the processes intended to advance these policies. Failure to do so will result in lost opportunities and the emergence of system wide inefficiencies that will negatively impact New Zealand's ablity to effectively reduce carbon emissions across the wider transport sector. The following proposals would benefit from close aviation sector involvement as they are developed and progressed,

Electrify NZ - reduce consenting burden

As noted in below in this submission, airports are becoming renewable electricity generators and airlines are renewable electricity users (and will, over time, become one of the largest users for battery electric and hybrid aircraft charging, green hydrogen, and e/Power to Liquid (PtL) SAF.

Investigation of carbon capture and storage

Direct Air Carbon Capture and Storage (DACCS) is emerging as a complementary solution to SAF and green hydrogen, with captured pure CO2 being reused in the production of PtL fuels. We note that carbon capture is currently the highest cost, lowest impact technology for decarbonisation but we do see merit in investigating its potential for New Zealand. The aviation industry can engage with the Government and agencies in this workstream to explore the potential for wider ecosystem co-benefits from investment in carbon capture.

Targeting of 10,000 electric vehicle chargers by 2030

Airports can contribute to this goal as major regional infrastructure hubs connecting vehicle transport with air transport and advise on barriers to investment. Airports are investing in electric vehicle (EV) chargers for both customer parking and rental vehicle fleets up to the limits of transmission capacity to their locations. We recommend the Government include airports in assessments of transmission requirements. The Government could consider counting airport EV chargers in the 10,000 target and consider how to partner with airports to better accelerate their investments.

Better public transport

Public transport planning that facilitates fast and efficient connections with airports and air transport supports the wider transport sector and helps to decarbonize the busiest transport corridors in New Zealand cities and towns.

Question 6.6. What opportunities might there be from rolling out new technologies to reduce emissions from aviation and shipping?

There are multiple opportunities Government should harness and facilitate in working collaboratively with the aviation sector to reduce aviation carbon emissions, particularly where they will have regional and wider sector co-benefits.

Co-benefits from domestic SAF production

A viable domestic SAF production industry will boost fuel supply resilience and create co-benefits of economic growth and employment opportunities for regional areas

within New Zealand. As the primary mechanism for carbon emissions reduction in aviation, access to SAF will shore up the long-term viability of New Zealand's aviation sector and the international and domestic aviation connectivity required for economic growth, social connectivity, and resilient regional domestic communities.

It is important to note that SAF production will be needed across almost every country to meet the global 2050 target. The Air Transport Action Group estimates that globally aviation will require up to 7,000 renewable fuel refineries by 2050[1]. Even in ambitious scenarios, modeling conducted shows that Australia's domestic biogenic SAF production capacity is estimated as meeting approximately 50% of its fuel demand by 2050[2], leaving potential scope for both domestic use and export opportunities for New Zealand. This is acknowledging that Government will ultimately need to consider the demand needs of all sectors when determining an appropriate approach to the domestic production of biofuels.

Collectively these factors also highlight the importance of an [international] regional approach to the development of a credible SAF market as referred to previously in this submission under our response to question 6.5, and the heading of Alignment with Other Countries. In the same manner they speak to the importance of the 2+2 Dialogue outcome referring to the development of a [international] regional SAF industry and exploration of opportunities for the regional production of SAF. As we note below under our response to question 6.8, this approach must also take account of the needs of our Pacific Island partners.

Airports present opportunities for significant domestic regional co-benefits

Airports are not only aviation assets but also regional industrial and commercial infrastructure and connectivity hubs, and should be recognised as such by ERP2.[3]

Investments in aviation decarbonisation and related airport infrastructure can have significant domestic regional co-benefits for job creation, cross-sector carbon emissions reduction and efficiencies for heavy freight, regional energy generation through solar farm investment and coherent planning across aviation connectivity and public transport.

[1] https://atag.org/industry-topics/sustainable-aviation-fuel#:~:text=It%20also%20indicates%20that%20aviation,and%20resilience%20for%20many%20nations

[2] https://www.investregional.nsw.gov.au/sites/default/files/publications/2024-07/Sustainable-Aviation-Fuel-Prospectus_1.pdf

[3] See commentary on the role of airports as Smart Energy Hubs from the Swedish National Road and Transport Research Institute, World Economic Forum and European Union, including Projects MAGPIE and TULIPS. Airports are being utilised as natural energy producers and demand aggregators.

However, as detailed in the responses to question 6.8 below, action is needed from Government to allow these benefits to be unlocked.

6.7 What are the three main actions the Government can do to make it easier to reduce emissions from aviation and maritime fuels (without adding too much cost for households and businesses)?

1. As commented on above, move on the early development of enabling policy framework for carbon emissions reduction by utilising the content of Australia's recent Low Carbon Liquid Fuel (LCLF) consultation process as a basis for consultation in New Zealand. This process would then be informed by Australia's policy decisions once its consultation is complete, as a basis for New Zealand to either align or diverge from those decisions where this may be appropriate for our context. Such an approach is consistent with the intent signalled in the recent The resulting policy framework will, among other outcomes:
    - need to create a credible, long-term SAF market which drives down the cost of abatement over time, including via ensuring SAF eligibility in the ETS and/or CORSIA, to improve business cases whilst keeping the Market Based Measure approach represented by the ETS credible; and
    - allow for the consideration of the need for Public Private Partnerships or other appropriate co-investment and incentivisation models to align economic incentives with the national interest in economic growth and productivity and unlock the private investment at scale necessary for domestic SAF production.

2. Ensure an efficient and robust international Book and Claim system to enable regionally (Asia/Pacific) produced SAF to meet domestic needs. To address any concerns that may exist around such moves potentially disincentivising the domestic production of SAF in the longer term, the systems established should be subject to appropriate periodic review.

3. Remove the regulatory barrier created by the current fuels definition in Clause 4 of the Liquid Fossil Fuel regulation. Customs and Excise duties processes are not able to code SAF separately from fossil fuel jet fuel. If SAF is not identified at the import or manufacture point, then the assumption in the emission inventories would be that only fossil fuel is being used.

Question 6.8. Please provide any additional feedback on the Government's thinking about how to reduce emissions in the transport sector

Renewable energy needs

As commented on previously there is a clear need to ensure that future demand projections for renewable electricity take into account aviation sector needs, including for electric aircraft and potential Power to Liquid (PtL) SAF production methods. New Zealand's wider renewable energy targets and infrastructure requirements need to be informed by potential aviation demand projections.

In support of this outcome airports and airlines should be brought around the table of all energy policy processes as both new energy generators and major energy users in the future system

The treatment of maritime emissions – ensuring no perverse outcomes

Noting that ERP2 also covers maritime emissions there is a need to ensure that the treatment of these does not result in perverse outcomes on the cost and supply of imported SAF to the New Zealand aviation market.

Supporting our Pacific Island partners

It is crucial that any approaches taken in ERP2 do not negatively impact on the security and resilience of fuel supplies in Pacific Island Countries – and supports equitable access to SAF for them.

This is noting the recent 2+2 Dialogue outcome referring to the conditions required to develop a **regional sustainable aviation fuel (SAF) industry**. In this context a regional approach must encompass our Pacific Island partners who are heavily dependent, as we are, on the effective transition of aviation systems to low emission fuels or renewable energy.

Airport infrastructure challenges

To deal with the challenge of planning infrastructure in advance of settled carbon emissions reduction technology, airports need to proceed with 'no regrets' initiatives that can be used by airlines in the future regardless of the aircraft type they will ultimately use.

<u>Consenting challenges</u>

A key example of such "no regrets" initiatives is the development of airport solar farms. These support Scope 1 and 2 emissions reductions for airports and Scope 3 emissions reductions for airport stakeholders including airlines, and support regional electricity resilience.

While regional airports have had success planning and delivering solar farms quickly at relatively small scale, large airports and other investors will need to develop significantly larger scale solar farms, in short timeframes, to achieve New Zealand's

targets. Government and agency assessment and approval systems will need to get better at assessing and consenting projects of this significant size.

Government can support these projects through multiple pathways, including

- An appropriately robust fast track consenting process;
- the Electrify NZ policy process; and
- electricity network planning including more resilient transmission networks.

We recommend ERP2 include actions by the Ministry for the Environment (MfE) , MBIE and the Infrastructure Commission, along with the intended new National Infrastructure Agency, to evaluate what consenting settings will practically facilitate the necessary infrastructure development at the required scale.

Critical infrastructure as heavy energy users

Under the current regulatory system, airports looking to make major contributions to the electricity network through solar farms are anticipating challenges in being able to draw on the renewable energy they are generating, through the ability of other stakeholders to apply for access.

We recommend the government consider identifying and recognising 'heavy energy users' in critical infrastructure who should be incentivised to add generation capacity to the network that can then be ringfenced for their use on energy requirements that are in the national interest (such as decarbonised aviation). Similar issues may apply to other major investors in renewable fuel plants.

Runway extensions

Another 'no regrets' initiative for some specific, small airports will be runway extensions. For these smaller airports with shorter runways, it is possible to evaluate in advance whether the likely aircraft types to be utilised in the coming 10-20-30 years (whether conventional or low/zero carbon emissions) will require longer runways or different runway configurations, thus allowing for advance investment and better readiness for the future transition.

This can provide a co-benefit in preparing a regional airport for higher capacity flights in the meantime, if supported by airline customers. The government can support smart and strategic decisions on runway investments through:

- The Regional Infrastructure Fund, where government funding facilitation can reduce the long term pressure on the aviation sector to fund regional infrastructure where the existing user pays model is unlikely to be sufficient. This is not to suggest the

user pays model does not have a crucial part to play – rather that there are instances, as was noted by the 2023 report of the independent Air Navigation System Review, where this model does not cover all system requirements[4].

- Re-evaluating New Zealand's Civil Aviation Rules relating to Runway End Safety Areas (RESAs) to align with ICAO standards. This will ensure that runway extensions are only planned where they are actually required.

[4] See https://www.transport.govt.nz/assets/Uploads/Air-Navigation-System-Review-phase-two-report-May-2023.pdf at p. 45.