

Pathways Call for Evidence Submission

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Decarbonisation Pathways for NSW: Call for Evidence

For the Net Zero Commission

Jet Zero Australia

14 August 2026

Jet Zero Australia Pty Ltd. ACN 656 170 393

Executive Summary

Jet Zero Australia Pty Ltd (Jet Zero) thanks the Net Zero Commission (the Commission) for this opportunity to provide a written submission regarding NSW's approach to decarbonisation.

Jet Zero is the most advanced and diversified biofuels project developer in Australia. We are 100% committed to the development of low carbon liquid fuels (LCLFs) and are committed to working with the NSW Government to achieve this. We currently have two projects in progress using demonstrated production pathways:

- Project Ulysses in Townsville targeting >100ML per year of sustainable aviation fuel (SAF) and renewable diesel (RD) production by 2029 through the Alcohol-to-Jet (ATJ) pathway, and
- Project Mandala in Gladstone targeting ~400ML per year of LCLF production by 2030 through the Hydrotreated Esters and Fatty Acids (HEFA) pathway.

We are a proudly Australian company who have so far invested more than \$60 million in private capital, supported by an additional \$15 million in government investment from ARENA and the Queensland Government through grants to help catalyse the domestic industry.

With Australia's largest aviation demand and the most significant theoretical feedstock potential in the nation, NSW is a prime location to stand-up a world-leading biofuels industry. There is very strong alignment across government, industry and key supply chain players around the opportunity to establish NSW as a leading location for SAF production, building on NSW's aviation fuel demand (focused on a small number of airports), established logistics and fuel infrastructure, and substantial agricultural feedstock base.



Key industry stakeholders supporting the development of a NSW biofuels industry

Jet Zero sees a clear opportunity to contribute its project development experience to translating these strengths into commercially viable SAF production in NSW.

Australian Transport Sector LCLFs as Decarbonisation Catalysts

Australia's transport sector - particularly aviation and heavy transport - remains among the most challenging to decarbonise. SAF and RD provide globally demonstrated solutions for emissions reduction in these hard-to-abate sectors by enabling:

- Immediate emissions reductions of up to 80% when compared with fossil-based equivalent
- Drop-in compatibility with existing aircraft and diesel engine (fully ASTM certified) with minimal fuel handling infrastructure changes

- Outstanding fuel security benefits that leverage domestic refining and feedstocks capacity plus flexible production of either SAF or RD based on sovereign / market demand
- Operational alignment with Defence platforms, as recognised in the *Australian Defence Force's Future Energy Strategy* and the *Defence Net Zero Strategy*.

Together, SAF and RD offer practical, near-term pathways to reduce emissions across aviation, freight, mining and agriculture - sectors that are fundamental to NSW's economy and export base. Importantly, Australia's domestic aviation industry is the eighth largest in the world, creating a substantial domestic market for SAF demand. This differentiates SAF from other energy industries, such as liquefied natural gas (LNG), whose economics are primarily export-driven.

Strong supply and demand conditions indicate NSW is well positioned to be one of Asia Pacific's principal biofuels production anchors.

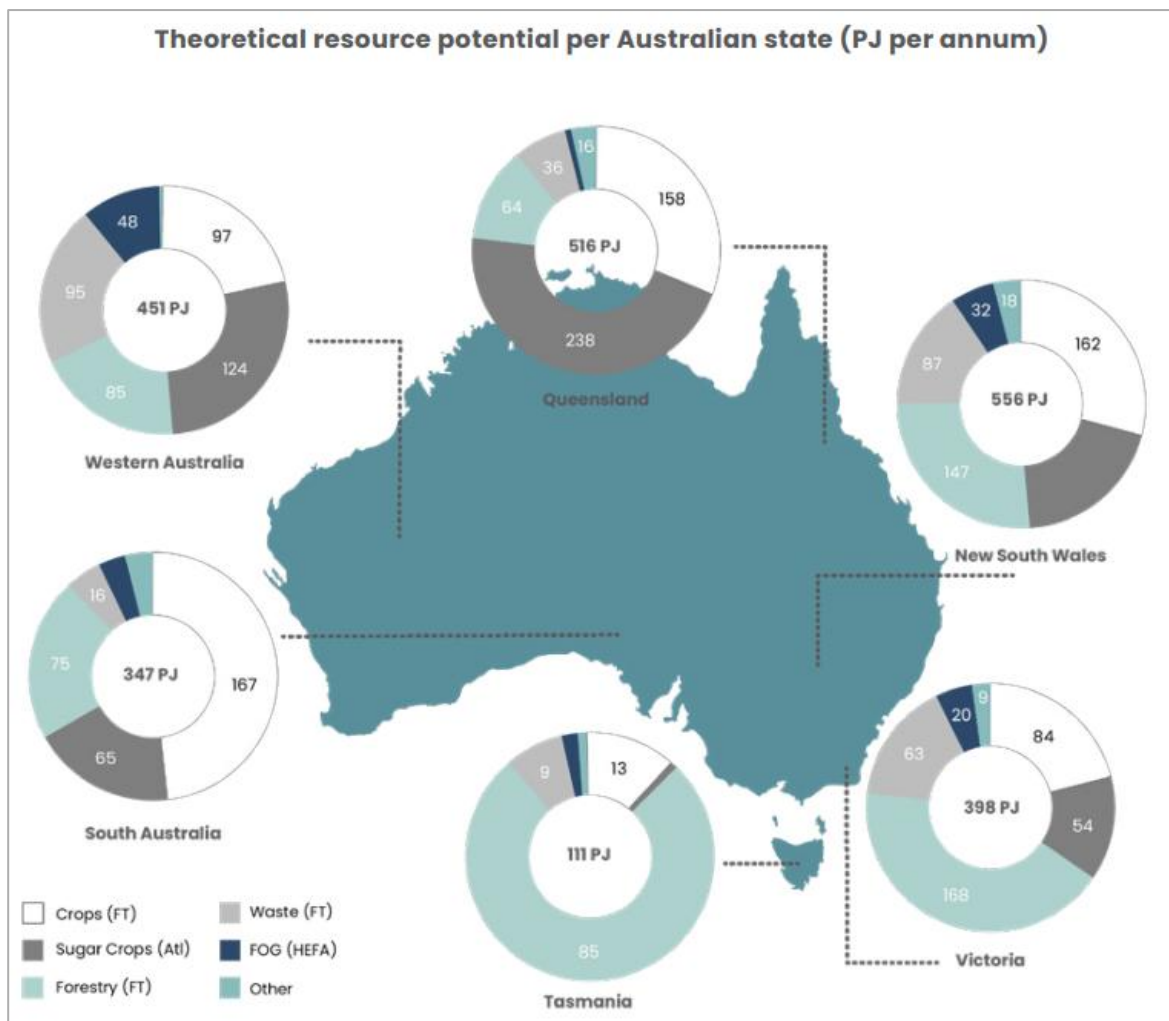
NSW is one of the few Australian jurisdictions with the combination of aviation demand, feedstock potential and industrial infrastructure required to support SAF production at commercial scale.

Sydney Airport alone consumes around 3.6 billion litres of aviation fuel each year, equivalent to approximately 40 per cent of national jet fuel consumption. As aviation activity grows and domestic and international decarbonisation requirements tighten, NSW SAF demand is estimated to reach 4.0–4.3 billion litres annually by 2050, representing a potential market of approximately \$4.8 billion within the State and \$11.9 billion nationally.¹

NSW also has a substantial prospective LCLF feedstock base that provides a comparative advantage and major economic potential opportunity for Regional NSW. The State is estimated to generate around 21 million tonnes of potential feedstock each year, spanning agricultural residues and biomass across the Riverina-Murray, New England North West and Central West, together with substantial municipal and commercial waste streams in metropolitan areas. This highlights the scale of NSW's potential feedstock opportunity and the scope to build a diversified domestic feedstock supply chain rather than continue exporting Australian biomass into offshore LCLF markets.

NSW leads all other states when assessing both the theoretical potential for biogenic and non-biogenic feedstock available in the state. NSW has 556 PJ per annum of potential resource potential, including canola oil, waste wheat starch, tallow and other animal fats, sugarcane and bagasse, woody biomass and municipal solid waste (MSW).

¹ NSW Government Department of Primary Industries and Regional Development, [Sustainable Aviation Fuel Prospectus](#), March 2024



Source: Deloitte, *Transitioning Australia's Liquid Fuel Sector: The Role of Renewable Fuels*, May 2023

These resources are reinforced by established infrastructure that can support aggregation, production and distribution at scale, including Sydney and Western Sydney airports, the ports of Newcastle and Port Kembla, established road and rail networks and emerging hydrogen infrastructure.

Combined with NSW's existing capability across engineering, construction, energy, mining and waste services, these advantages could support at least 2.0 billion litres of biogenic SAF production annually by 2040. This would be sufficient to meet a material share of projected NSW SAF demand, positioning SAF as both a decarbonisation pathway and a new industrial value chain for the State.

About Jet Zero

Jet Zero is an Australian bioenergy company supported by investment from the Queensland Government, the Australian Renewable Energy Agency (ARENA), Qantas, Airbus and Idemitsu of Japan.

Since its inception in 2021, Jet Zero has completed advanced engineering, secured project sites, established domestic ethanol feedstock supply from agricultural by-products, secured SAF offtake agreements, and worked closely with our technology partners to optimise the production pathway and plant design. Jet Zero has invested more than \$60 million in private capital, supported by \$15 million in government grants.

Jet Zero takes commercially proven technology that be quickly and capital-efficiently brought to production.

Jet Zero is the most diversified and advanced biofuels project developer in Australia. Our projects include:

- **Project Ulysses** - Our SAF project in Townsville - the most advanced biofuels project in Australia - is expected to produce 113 million litres per year of low carbon liquid fuels (SAF and RD) by 2028 using a first-of-its-kind ATJ technology. The ATJ technology (licensed from LanzaJet) underpinning Project Ulysses recently reached first production of SAF in the United States (see announcement here: <https://www.lanzajet.com/news-insights/lanzajet-makes-history>).
- **Project Mandala** - Jet Zero's second project is a HEFA biorefinery that is progressing in Gladstone. The Project's feasibility study was concluded in May 2026, alongside an executed Letter of Intent with Gladstone Ports Corporation. The project is targeting ~400ML per year of LCLF production by 2030, nearly four times the combined SAF and RD output of Project Ulysses.

Both of these facilities will have high flexibility in the production ratio of SAF versus RD, realised through purely operational adjustments of the plant which can be achieved in hours.

- **Silvo Plus** – Jet Zero has also invested in a 10-hectare pongamia and agave trial plantation in Queensland near Charters Towers. The objective of this trial is to work with investors, producers and landowners to trial techniques of growing pongamia and other non-food crops under a silvopasture model as a future potential feedstock for domestic LCLFs.

Jet Zero's broader mission is to help establish a viable, enduring and globally competitive sustainable fuels industry in Australia – one that leverages the nation's agricultural base to help deliver national fuel security, domestic manufacturing, value-added products, regional resilience, and material decarbonisation outcomes.

Policies and Market Mechanisms

[1] What opportunities or barriers could improve the effectiveness of NSW's transition to net zero?

LCLFs will have a critical role in decarbonising hard-to-abate sectors in Australia, which currently account for around half of liquid fuel emissions. NSW, with its significant demand for aviation fuel and diverse feedstock base, has an opportunity to leverage this demand. Domestic production and the development of this industry is dependent on a coordinated approach across public and private sectors in overcoming relevant challenges.

The key commercial risks and uncertainties for LCLF investment in Australia relate to the absence of a domestic SAF or LCLF mandate, which weakens long term demand certainty and encourages Australian feedstocks to flow to offshore projects. This is compounded by the timing and limited scale of current Federal and State Government supply-side programs (e.g. grants, concessional loans, production incentives). Other countries are offering grants and significant tax allowances and production incentives for early projects, further tilting investor capital and LCLF feedstocks offshore. Together, these factors create material uncertainty for investors considering large, capital-intensive LCLF production assets in Australia.

Jet Zero believes that the following initiatives will be critical to decarbonising NSW transport sector, whilst also addressing the respective barriers.

Policy Area	Rationale
National LCLF Demand-side Mechanism	- Globally, SAF mandates have been a primary mechanism to stimulate large scale LCLF investment. For example, SAF mandates commenced in the United Kingdom and European Union in January 2025, Singapore in 2026, and are scheduled in South Korea, India, Indonesia and Brazil from 2027. - The Commonwealth has now announced a national LCLF demand-side mechanism will be introduced, with industry consultation commencing in August 2026 and policy design expected to be finalised by the end of 2026. This represents an important step towards providing the long-term demand certainty required to support investment in domestic LCLF production. - Extensive economic modelling in Australia and experience overseas has shown that modest SAF mandates have virtually indiscernible impact on ticket prices. For example, modelling commissioned by Jet Zero shows a 2% uptake of SAF in the jet fuel mix would result in a maximum potential price impact of \$2.20 per average domestic ticket price. - NSW should actively participate in the Commonwealth consultation and advocate for a clear, progressively increasing volumetric LCLF mandate, structured to provide a credible long-term demand signal while recognising the lifecycle emissions performance of eligible fuels. - Increasing a well-designed national mechanism would improve project bankability and help direct capital, feedstocks and enabling infrastructure towards domestic production, reducing the risk that Australian feedstocks are committed to offshore production before a domestic industry reaches scale. - For NSW, this would strengthen the investment case for an integrated SAF supply chain by providing greater certainty around future demand and supporting investment across feedstock aggregation, production, storage, blending and distribution infrastructure.
Strategic Site Identification & Facilitation	Logistical, infrastructure and planning constraints mean there are only a limited number of locations in NSW suitable for a globally competitive SAF biorefinery project.

	• Early government engagement through the Investment Delivery Authority (IDA), or similar facilitation, would provide an important signal to private investors that the project is considered strategically significant to the state's economic and industrial development objectives. • Key site selection criteria include: ○ Proximity to port infrastructure for modular construction, feedstock import/export and fuel distribution ○ Heavy industrial (E5) zoning and compatibility with State Significant Development (SSD) pathways ○ Access to skilled local technical and engineering workforces to operate and maintain the facilities ○ Proximity to available feedstock (via port or rail) ○ Access to industrial utilities, renewable energy and future hydrogen infrastructure as all LCLF production processes require hydrogen as an input ○ Availability of water, wastewater and supporting logistics infrastructure ○ Minimise planning, environmental and community risk profiles ○ Pathway to acquire freehold or leasehold. • Preliminary investigations have identified three prospective locations for further assessment: Port of Newcastle, Port Kembla and Kurnell. • A coordinated assessment involving relevant NSW agencies, ports, infrastructure owners and prospective producers would provide greater certainty on site suitability, infrastructure requirements and approvals pathways before significant development capital is committed.
Early Development / Feasibility NSW Grants	• Even technically proven LCLF projects are capital-intensive and high-risk through feasibility, engineering, approvals and final investment decision. Emerging LCLF pathways such as those employing gasification introduce extra technical and operational risks as this equipment remains immature globally. • The NSW Government should consider introducing grant programs that co-invest with proponents in prioritising high-readiness technologies demonstrated at industrial scale and capable of contributing to the State's 2030 and 2035 emissions objectives. • A NSW Government commitment of ~\$1 million, when paired with co-investment from a proponent, would be sufficient to commence a feasibility study on a project (e.g. in March 2023 the Queensland Government invested \$760,000 in a \$6 million feasibility study for Project Ulysses, with the project now funded through to FEED). • Government funding should support feasibility assessment, feedstock and supply-chain analysis, preliminary engineering, carbon-intensity modelling, approvals strategy and commercial structuring. • Assistance should be stage-gated and released against clear milestones to maximise value for money and crowd-in private capital. Less mature technologies should be supported through separate research and demonstration programs rather than displacing funding for near-term commercial deployment. • The experience in Australia and overseas is that modest government investment in the initiation of feasibility studies has unlocked significantly more in private capital towards commencing biofuels projects. • As one of the most progressed SAF project developers in Australia, Jet Zero would be well-positioned to lead development of a NSW feasibility study, leveraging learnings from both Project Ulysses (ATJ) in Townsville and Project Mandala (HEFA) in Gladstone to maximise value for money and reduce project delivery risk.

Eligibility Requirements	- Numerous innovative LCLF production pathways outside of HEFA and ATJ are being developed around the world, however none are yet to be proven commercially and at-scale. - HEFA and ATJ are currently the two SAF production pathways with evidence of commercial-scale deployment, with HEFA being the most mature and widely deployed pathway globally. - The NSW Government should take an approach of supporting only commercial technologies that are proven to produce biofuels at-scale, without setting overly onerous eligibility criteria that stifle innovation or a wide range of project proponents. - It is recommended minimum technology and commercial readiness thresholds be set at a suggested level of minimum TRL 7 and Commercial Readiness Index (CRI). - Over 90% of biorefinery projects around the world have been initiated, developed or owned by for-profit entities. It is therefore advisable that no eligibility restrictions on for-profit organisations receiving support should be applied.
Regional Feedstock and Supply-Chain Capability	- NSW has a large prospective feedstock base, but commercial value will firstly depend on whether a proven technology is available which can reliably convert those specific feedstocks into LCLFs affordably, reliably and at scale, and to compete successfully against more mature LCLF production pathways (including imports). - For example, most waste-based pathways first involve gasification which has not yet been demonstrated successfully as the first step in a viable LCLF production train. Even if this aspect is adequately de-risked, and some progress is expected in the next 5 to 10 years, other key constraints are aggregation, seasonality, competing uses, transport distances and the absence of established supply-chain models to deliver these feedstocks to a commercial LCLF plant. - Another condition for a successful pathway is the carbon intensity of generating and pre-processing the feedstock, according to international lifecycle analysis norms, which will inform the sustainability credentials of the resultant LCLF. - NSW should therefore focus on building the commercial foundations of regional feedstock supply, critically assessing the feedstocks available according to the maturity of downstream conversion processes, and sustainability/carbon intensity assessment, but also seeking better data on recoverable volumes and delivered costs, closer coordination with growers and processors, and development of regional aggregation and logistics models that can support reliable long-term supply. - Regional hub-and-spoke models should be considered where primary processing closer to the source can improve transport economics and expand the range of feedstocks that can be supplied competitively to larger coastal production facilities. An example of this is torrefaction of wood waste to drive off moisture, improve handling characteristics, and reduce mass. - Government and industry co-funding can play a targeted role in de-risking R&D and early-stage commercial activity, particularly for new crops, residues and preprocessing pathways that could expand the volume and diversity of feedstocks available over time. - Government can also help substantively in simplifying regulatory requirements and facilitating passage of project development through such requirements.
NSW Procurement Policies	- The NSW Government procures approximately 100 ML per annum of combined diesel and jet fuel demand. Government procurement of SAF and RD is one lever available to government to stimulate a sector, most relevant to the Commonwealth. - At this early stage of the NSW industry's development there is currently minimal opportunity for offtake agreements with the NSW Government.

Technology and Behaviour Change

[2] What are the opportunities and barriers to technology development, deployment for each sector?

The key technical barriers to LCLF production and deployment in NSW relate to the limited availability of proven, large-scale production pathways beyond HEFA, the relatively limited commercial operating experience with ATJ, and, on the feedstock side, the challenge of aggregating and converting dispersed, low-energy-density biomass and waste into consistent, plant-ready feedstocks. These constraints are compounded by the reliability requirements and capital intensity associated with processing these feedstocks into LCLFs.

For Jet Zero's chosen HEFA and ATJ pathways, these technical risks are already being managed through the use of certified, high-TRL technologies with multiple established licensors, and solid experience in reference plants. The remaining barriers are increasingly commercial and system-integration in nature, including access to existing fuel infrastructure, the development of reliable feedstock supply chains and the need to build confidence among fuel users.

Commerciality of a LCLF production pathway is also determined by its success in relation to an acceptable production cost. In the international experience the current threshold for successful projects has been shown to be projects with between 2 to 3 times the production cost (on a \$ per Litre) of the fossil fuel equivalent. HEFA and ATJ are the only pathways currently offering this level of competitive production cost profile.

The NSW Government is well placed to accelerate LCLF project development by focusing on near term support on technologies that are already demonstrably mature, while offering more limited support such as seed funding to continue to develop a range of the next generation of production pathways and feedstock solutions chosen specifically to suit potential NSW feedstock types.

Risks & Barriers to Technology Development & Deployment

Technology maturity and scale up risk

- All of current global SAF and RD production is via the HEFA pathway using fats, oils and greases with hydrotreating under pressure and temperature.
- The most advanced non-HEFA route is ATJ, with the lead plant being commissioned in Georgia, United States. This project is being delivered by LanzaJet – Jet Zero's technology licensor for Project Ulysses, and serves as Project Ulysses' reference project.
- Based on available agricultural feedstocks, either has potential in NSW.
- All other pathways (i.e. Fischer-Tropsch + gasification, Power-to-Liquids) have not yet been demonstrated beyond pilot scale and are still many years away from being proven at even a semi-commercial scale.
- Lower TRL pathways also remain materially higher cost, with indicative CSIRO modelling suggesting PtL/eSAF is currently around 1.5–3 times more costly than HEFA and ATJ.
- These factors have informed Jet Zero's decision to focus on HEFA and ATJ, which use energy dense liquid bio feedstocks already available domestically and are the only pathways that can credibly offer secure SAF and RD supply at scale in the next five to ten years.
- HEFA and ATJ also provide Jet Zero flexibility between SAF and RD based on demand and market signals – which other pathways cannot deliver (e.g. Fischer Tropsch's and Methanol-to-Jet's limited flexibilities). This is particularly important in times of surge

	demand or extreme inbound fuel supply constraints (e.g. due to a national fuel security crisis).
Conversion of biomass and wastes into plant ready feedstocks	- Many reports highlight the theoretical potential of Australian biomass and wastes, but often understate the technical challenges involved in converting this potential into LCLFs. - Key barriers include harvesting, transporting and aggregating low energy density feedstocks, then pre-processing them into a form suitable to be further converted into hydrocarbon fuels. - Lignocellulosic gasification to a syngas quality suitable for hydrocarbon fuel synthesis has not yet been demonstrated in a commercial plant worldwide. Other biogenic-containing solids such as Municipal Solid Waste (MSW) or construction waste pose further challenges in handling these amorphous mixtures into a form which can be reliably injected into gasification facilities and the many fouling and corrosive by-products dealt with. Whilst given the effort and investment being expended internationally, it is likely that these challenges will be overcome in time, but such pathways are unlikely to scale before 2040. - Early semi commercial second-generation ethanol plants are still emerging, and the sector has experienced a number of failures. - These realities constrain the range of technically and commercially viable pathways available to Australian LCLF projects in the near term, and reinforce the value of focusing on proven HEFA and ATJ pathways in the five-to-ten-year horizon.
How the NSW Government could assist in addressing technical challenges	
Focus public support on low technology risk pathways	- Policy support should initially focus on projects using pathways at TRL 7 or above, with a full pathway demonstrated at industrial scale, in order to deploy limited public capital where it can deliver early production, de-risk the sector and crowd-in private investment. - Maintain separate R&D and demonstration programs for earlier-stage pathways so that emerging technologies can continue to progress without competing directly with projects that are ready for commercial deployment.
Ensure sufficient support to develop feedstock supply chains	- Support the aggregation and preprocessing of NSW agricultural residues, food-processing wastes and other sustainable feedstocks into specification-compliant liquids suitable for LCLF production. - Improve the evidence base on feedstock availability, competing uses, lifecycle emissions and regional logistics costs. - Improving rail efficiency and targeting upgrades to road and rail links will lower the total system cost of new feedstock sources - Assess regional hub-and-spoke models where preprocessing closer to the feedstock source can increase energy density, reduce transport costs and strengthen the economics of supplying larger coastal production hubs
Reduce market-access barriers	- Facilitate access for qualified LCLF producers to existing terminals, industrial centres, storage, pipelines, blending facilities and logistics infrastructure where practicable. - Support open-access storage and blending infrastructure at major airports, ports and freight hubs to avoid unnecessary duplication and reduce barriers to market entry.

Evidence and other considerations

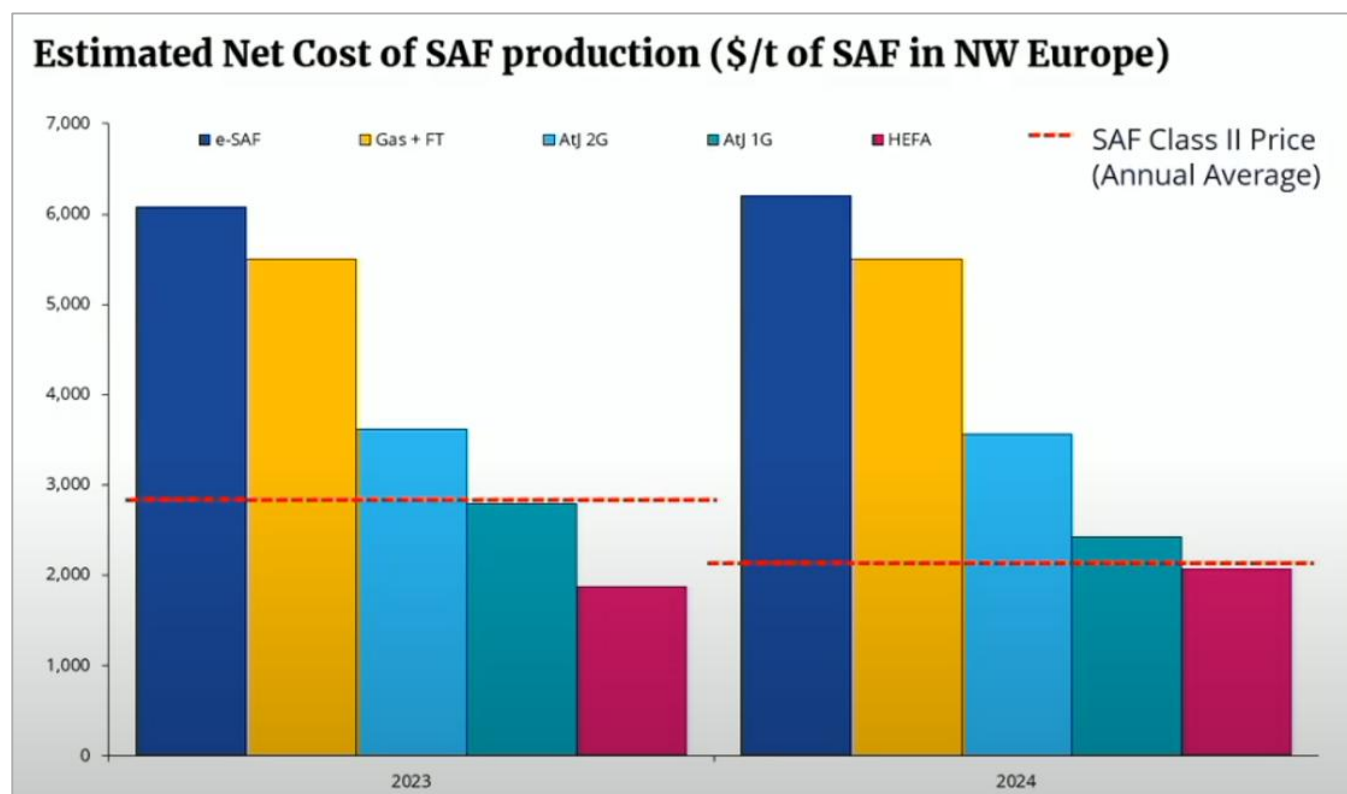
[6] What evidence can you provide to inform pathway inputs and assumptions? For example, cost curves, deployment rates, or sector-specific data, include commercially sensitive data where relevant.

Technology Readiness and Bankability

HEFA and ATJ represent the only two commercial-scale SAF pathways with proven Technology Readiness Levels (TRL) of 8 to 9 under ASTM D7566 certification. In project finance, TRL 8 to 9 execution is a non-negotiable prerequisite for debt underwriting as it allows project developers to secure fully/partially wrapped EPC contracts, standard licensor performance guarantees, and lower Weighted Average Cost of Capital (WACC). To ensure efficient deployment of both public and private funds, we need to focus initial support to the delivery of large-scale projects utilising the higher TRL pathways to catalyse the industry and to pave the way for future projects and pathways.

Cost Profile & Feedstock Dynamics

HEFA and ATJ offer the lowest Levelized Cost of Production (LCOP) across all approved synthetic kerosene pathways. Many studies demonstrate this, for example the following provided by the industry-leading market insights firm Argus, presented at the Australian Renewable Fuels Week 2025:



Source: Argus, March 2025

While HEFA delivers the lowest levelised cost and the highest production scale, its long-term growth is constrained by global structural caps on waste lipid feedstocks (e.g., used cooking oil and animal fats). ATJ solves this volume bottleneck by tapping into mature, highly liquid global ethanol supply chains, providing a scalable bridge to meet blending mandates as HEFA feedstock ceilings are reached. A decline in global gasoline consumption due to light vehicle electrification will displace fuel ethanol from blending into petrol

and make more available for higher-value uses, such as ATJ SAF. Note the above chart differentiates between cane- and crop-derived ethanol (1G) and lignocellulosic-derived ethanol (2G), the latter still a technology in development but imposing higher capex and opex but which will further increase available ethanol volumes and improve the sustainability credentials of the LCLFs made from it.

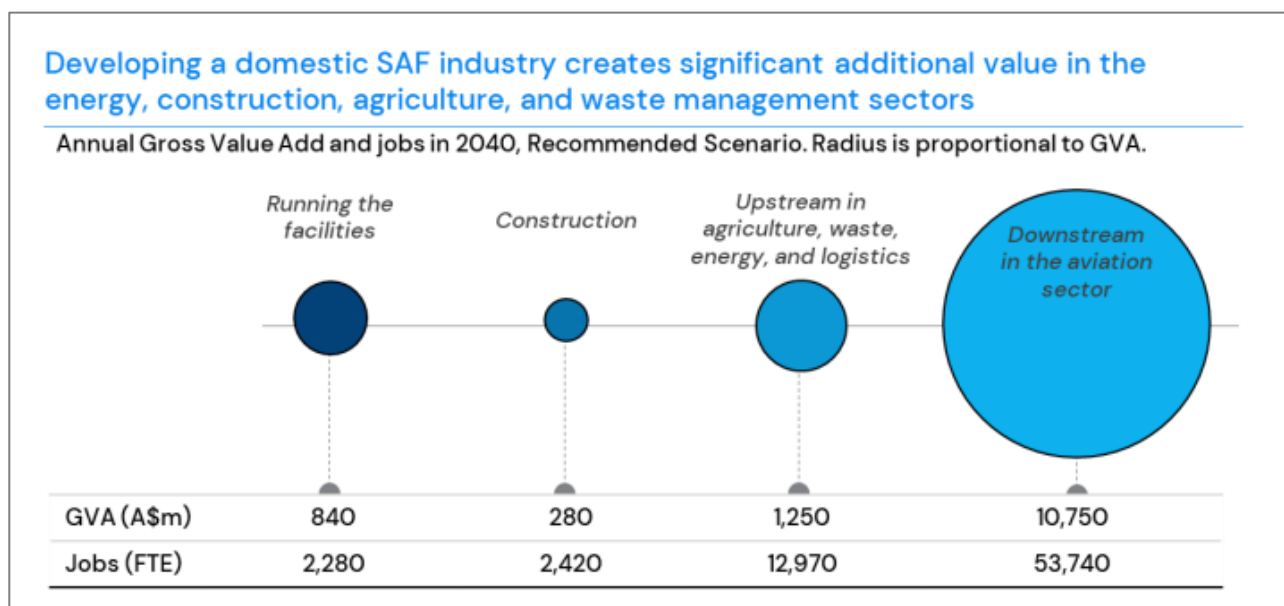
Sector Trajectory & Underwriting Inputs

Modelling for near-term deployment should assume HEFA will supply over 90% of global SAF volumes through 2030, with ATJ capturing an increasing market share from 2030 onward. Both pathways offer robust lifecycle GHG reductions (50–85%+), depending on process energy, green hydrogen integration, and decarbonization of the ethanol feedstock upstream (such as carbon capture or sustainable agriculture). For debt-underwritten facilities, commercial bankability across both pathways remains tied to long-term 10- to 15-year take-or-pay off-take structures and predictable index-linked pricing to insulate debt service coverage ratios against feedstock price shocks.

[7] Beyond emissions reduction, what outcomes should be considered? For example, impacts on business, jobs, land-use, water and biodiversity.

Alongside decarbonising aviation, building a domestic SAF industry would provide significant economic opportunities including the diversification of regional economies and to increase Australia's energy security.

SAF production has the potential to contribute \$13 billion to Australia's GDP each year by 2040, supporting nearly 13,000 jobs across the feedstock supply chain (primarily in agriculture) and creating a further 5,000 high-value operational roles in production facilities, primarily in regional areas.²



Source: Qantas Group and Airbus, *Developing a SAF industry to decarbonise Australian aviation*, 2023

This emerging industry enables local agricultural producers to generate new revenue streams from agricultural residues and waste materials, while becoming part of a high value national SAF supply chain. NSW stands to benefit largely due to the significant feedstock opportunities, thus capturing the economic, employment and export opportunities associated with the development of a domestic SAF industry.

Further to economic activity, a domestic SAF industry represents a strategic move to reverse Australia's growing dependence on imported liquid fuels, strengthening the energy independence and security of

² Qantas Group and Airbus, *Developing a SAF industry to decarbonise Australian aviation*, 2023

Australia's economy. Australia is now one of the developed world's most import dependent economies for liquid fuels with ~80% of refined petroleum consumed in Australia imported, approximately 50 billion litres each year, the highest level on record following the closure of most domestic refining capacity. This reliance has implications not only on fuel security but on Australia's Defence capacity and sovereign capability. The Australian Defence Force's *Future Energy Strategy* acknowledges that its deployable capabilities remain reliant on imported fuels, and that these supply chains are susceptible to geopolitical conflict, environmental disruption and contested logistics, creating a material operational risk during crisis or conflict.³

Establishing large-scale domestic production of SAF and RD would diversify Defence's supply base, create sovereign production capacity, reduce dependence on vulnerable maritime trade routes and provide the Commonwealth with a secure, locally controlled source of fuels compatible with much of its existing aircraft, vessels, vehicles and supporting infrastructure.

For NSW, this presents an opportunity to work with the Commonwealth to strengthen the strategic value of the State's aviation, industrial and logistics infrastructure, while positioning NSW as a key contributor to Australia's sovereign fuel capability. We note that the NSW Investment Delivery Authority is seeking proposals that advance fuel security, and welcome this focus as a practical opportunity to support commercially credible SAF and LCLF projects that strengthen NSW's fuel resilience, industrial capability and contribution to national sovereign fuel security.

³ Australian Government, Department of Defence, [Defence Future Energy Strategy](#), October 2024