

August 29, 2025

To: Climate Change Review – NSW EPA
Via email climatechangereview@epa.nsw.gov.au

Just Biodiesel Pty Ltd is pleased to provide a submission in response to the “Proposed Greenhouse Gas Mitigation Guide for NSW Coal Mines’ Consultation Draft.

Just Biodiesel operates the largest Biodiesel plant in Australia, 60 million litres annual capacity, product meets Australian Fuel Standard, based at Barnawartha (northern Victoria).

1. Diesel volume usage across the NSW coal sector is of the order ~1 billion litres.
2. The EPA Proposed Biodiesel Policy targets are 5% 2030, 10% 2035 and 25% 2040. The suggested transition target of 2.5% for 2027 is realistic i.e. 25 million litres.
3. Biodiesel Price: the current price is of the order of double mineral diesel (excise stripped) i.e. 25 million litres will cost the industry a \$25 million cost impost. There is not an obvious path to price reduction of Biodiesel with proposed increased volume of the scheme i.e. the feedstock cost may increase, offsetting gains in processing efficiency. The outlook for feedstock prices is impacted by many factors - FX, EU & US subsidies/mandates, mineral oil price, seasonal factors [REDACTED]
4. Logistics: the 3 existing Biodiesel plants are each capable of efficient biodiesel supply to the NSW coal mining regions - Illawarra & Hunter. Fuel Blending can be done in-line at mine site, or by fuel companies at their storage sites, prior to delivery. Various blending capability is installed in the region and can be adapted to supply larger coal mine end-users in an efficient manner. Just Biodiesel would be able to supply B-double tanker transport to the regions in a cost-effective manner. Available capacity (across the 3 biodiesel plants) to supply is in the range 100 million litres, and this volume would require some time (approximately 6-months) to be able to meet demand - but given it is likely to be stepped, that is achievable until 2035. Thereafter there would be additional investment to meet the 2040 target. Imports would also be a possibility.
5. Technical: the proposed Biodiesel blends can be used in majority diesel engines at least up to B-20 level. The biodiesel supplied by the 3 producers meets the Australian Fuel standard.

In our view the project is neatly sized in terms of being realistic, and it could be implemented, without delay. The decarbonisation benefit for the NSW Government,

EPA & Coal mining sector would be significant. Furthermore, there may be a flow on effect to other sectors, thereby requiring further investment - feedstock & biodiesel. Just Biodiesel has accepted invitation to attend the discussion forum on October 2, 2025.

Regards,

Peter Chomley – Director 
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