

3rd December 2020

Australia – UK FTA Co-ordinator
Regional Trade Agreements Division
Department of Foreign Affairs and Trade
RG Casey Building, John McEwan Crescent
Barton, ACT 2600
Email: ukfta@dfat.gov.au

RE: Just Biodiesel Submission UK- Australia Free Trade Agreement

Dear Sir/Madam,

Attached is additional information from Just Biodiesel Pty Ltd to highlight a specific issue that impacts on the ability of Just Biodiesel to compete in the UK market. We request the item be tabled for discussion in the FTA negotiations.

The UK is a potentially significant export market for Australian produced biodiesel. Under the UK's Renewable Fuel Obligations Order, specific sustainability criteria must be met for renewable fuels to be entitled to receive Renewable Transport Fuel Certificates (RTFC's). Furthermore, to reduce the usage of virgin feedstock and encourage the reuse of waste products, biofuels produced from certain wastes or residues are double rewarded and receive twice as many RTFC's as virgin biofuel which are only eligible for regular single reward. This 'double counting' provision effectively rewards suitable product with a corresponding market price premium. However waste tallow based biodiesel (TME) supplied from outside of the EC is specifically excluded from this provision.

Just Biodiesel Barnawartha plant uses the same waste product feedstock, "Category 1 Tallow", that meets the criteria for double counting that would be applicable if production were within the EC. However, we are excluded from access to this attractive renewable fuels market purely based on geography rather than science. The basis of the double counting is to encourage biofuels which reduce carbon emissions. The actual greenhouse gas reductions are related to the status of feedstock used, not to the country of origin.

We firmly believe the importation of Australian biofuels to the UK is both in the interest of the UK carbon reduction goals and within the spirit of open and fair trade between our countries.

In summary, to promote unrestricted trade in the renewable sector, Just Biodiesel request the following:

- Removal of 6.5 % Import Duty on non-EU biodiesel entering UK
- Tallow Methyl Ester (TME) produced using Australian Category 1 Tallow to become eligible for 'double counting' under the RTFO.

Thankyou

Yours faithfully,



Greg Boyall

General Manager
Just Biodiesel

158 Plemings Road,
Indigo Valley, Victoria 3688, Australia
+61(0) 260 852 600 | +61(0) 401 700 543 | Greg.Boyall@justbiodiesel.com.au