



8th October 2025

Jack Turner
Department of Planning, Housing and Infrastructure

Dear Jack,

**RE EPA Advice on Amendment Report – HVO North and HVO South Continuation Projects – SSD
11826681 & SSD 11826621**

We refer to Environmental Protection Agency (EPA) Advice (Ref:DOC25/73525-12), In particular Attachment A, with regard to greenhouse gas emissions.

We are seeking to address these requests now, to allow EPA to complete their review of the Projects. Please find our responses below:

1. **Clarification of reduction rates for the period between 1 July 2029 to 1 July 2030**

The EPA recommends DPHI request the Applicant clarify the proposed reduction rates for the period between 1 July 2029 to 1 July 2030.

We confirm that there is no gap in the declared decline rates between 1 July 2029 and 1 July 2030 as described on **Page 46** of the GHG assessment prepared as part of the HVO Continuation Amendment Report, as the reduction rates listed relate to the financial years.

There is no gap in the calculation of the Safeguard baseline, or the additional voluntary contribution to reflect consideration of the NZF.

For clarity, please see **Attachment 1**.

2. **Greenhouse gas emission estimates for financial years**

The EPA recommends DPHI request the Applicant provide the GHG emission estimates for each financial year instead of calendar year.

Please see **Attachment 1** for this request.

3. Clarification of biodiesel fuel considerations

The EPA recommends DPHI request the Applicant to provide detail on whether various biodiesel blends (<20%) have been considered as an alternative to diesel while the proposed renewable fuel trials are underway.

Please note that HVO has not proposed renewable fuel trials in the Project's GHG assessment.

The potential use cases for sustainable fuels (including blended sustainable fuels), is described on **page 39** and **Table 3.11 (page 43)** of the GHG assessment included as Appendix E in the August 2025 Amendment Report.

Please also note that Glencore will be separately providing a detailed submission on the DRAFT Climate Change Requirements for Licensees (currently under consultation). This submission will provide information relating to biodiesel including potential blend limitations when used in Tier 4 final engines.

Whilst HVO has described Glencore's experience with 20% biofuel blends (**B20**) in the GHG assessment provided as part of the Amendment Report, HVO, with Glencore, has reviewed all available biodiesel options including blends lower than 20%. Likewise, in HVO's commitment "for investigating and implementing all reasonable and feasible abatement measures to minimise GHG emissions." HVO will, consider biofuel blends including lower ratio biodiesel blends.

The following, however, is a summary of the key points that are proposed to be included in Glencore's planned submission on the DRAFT Climate Change Requirements for Licensees. These aspects would also be relevant to HVO. The following key considerations for utilising biodiesel are:

1. Availability/price and cost-effectiveness of abatement

Availability and price are generally linked and will be a key driver of cost-effectiveness of biodiesels (or other sustainable fuels) for adoption, as discussed in the Amendment Report.

2. Engine performance, life and reliability,

Limitations and issues associated with any biodiesel is generally proportional to the biofuel ratio. Power output, and therefore fuel economy, may be reduced depending on the energy density of the blended fuel. Impacts such as susceptibility of biofuels to microbial growth, due to biodiesel's natural affinity with water, and therefore filter life and fuel system performance, is also proportional to biofuel proportion.

3. Emissions compliance.

Based on OEM advice available to Glencore, not all high power (>560kW) off-highway diesel engines with Tier 4 Final emissions compliance are able to use biodiesel blends. Glencore observes a range of limitations across Tier 4 final engines across its range of OEMs, from an inability to use any biodiesel blend, to a B7 limitation. Hence any future prescription on Tier 4 final engine use may have perverse consequences in terms of limiting biofuel blends that could be used.

We trust this is adequate for EPA to close out comments on HVO's GHG assessment. If you would like to discuss anything further, please contact Jason Martin on 0422 215 589, Jason.Martin@glencore.com.au or myself on 0438 433 857, Tim.Walls@glencore.com.au

Regards

A handwritten signature in black ink, appearing to read 'Tim Walls', with a stylized flourish at the end.

Tim Walls
Glencore

Enc. Attachment 1