



Bioenergy Australia Pty Ltd
PO Box 127, Civic Square, ACT 2608
Phone: 0439 555 764
Email: shahana@bioenergyaustralia.org.au

BIOENERGY AUSTRALIA SUBMISSION

Corporate Emissions Reduction Transparency Report – Draft Guidelines Consultation, October 2021

Bioenergy Australia (BA) is the national industry association, committed to accelerating Australia's bio economy. Our mission is to foster the bioenergy sector to generate jobs, secure investment, maximise the value of local resources, minimise waste and environmental impact, and develop and promote national bioenergy expertise into international markets.

Bioenergy Australia commend the Clean Energy Regulator on the development of the Corporate Emissions Reduction Transparency (CERT) report and see this as an important mechanism for businesses to report their emissions reductions in a transparent and uniform way. Thank you for the opportunity to provide feedback on the draft CERT guidelines.

At this stage, a key concern for BA is the CERT report will not recognise biomethane purchased through a multi-user gas network for a reduction in Scope 1 emissions. From our understanding, Scope 1 emissions reporting for the CERT report relies on NGERs which is location based and determines emissions based the average emissions of all gas sources. This negatively impacts the ability to report emissions reductions for both biomethane and hydrogen injected into the gas network. In contrast, a location and market-based approach is used for Scope 2 emissions and electricity.

Gas is a significant Scope 1 emission for many companies that will utilise the CERT report. Currently, the only option for companies to reduce these emissions through the CERT report is through offsets. This will inhibit the development of low-cost decarbonisation options for these companies and will be an impediment to Australia's burgeoning biomethane market. This lack of recognition discourages biomethane purchasers to enter into contracts to supply, transport and deliver biomethane through multi-user gas networks. We request the inclusion of market-based reporting of Scope 1 emissions and alterations to the NGER Measurement Determination as follows:

- Adoption of a federal green gas certification scheme such as the one under development by [Green Power](#) in partnership with Jemena and Energy Networks Australia which is currently being piloted at Jemena's Malabar biomethane project.
- Inclusion of biomethane in the proposed Guarantee of Origin which is under development by DISER.
- Amendment to the NGER Measurement Determination that will allow consumers (NGER Reporting Entities) of biomethane to account for a market-based Scope 1 emissions reduction when biomethane is combusted by that entity.

Biomethane has a substantial role to play in the decarbonisation of Australia's gas network and will be of particular value to industries that currently rely heavily on natural gas for heating, reforming,

refining and conventional gas-fired power generation. We encourage the CER to read Bioenergy Australia's previous submissions and publications relating to biomethane as follows:

- [Bioenergy Australia submission on the Hydrogen Guarantee of Origin Scheme](#)
- [Biogas Opportunities for Australia Report](#)
- [Renewable Gas Alliance submission on the Technology Investment Roadmap](#)
- [Bioenergy Australia submission to the Australian Bioenergy Roadmap](#)

We welcome any further questions and would be willing to work with the CER on the development of a mechanism to enable inclusion of biomethane in CERT reporting.

Thank you for the opportunity to provide this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Shahana McKenzie'. The signature is written in a cursive, flowing style.

Shahana McKenzie, CEO Bioenergy Australia