



14 September 2025

DCEEW

Climate Change, Net Zero and Emissions Reduction Group

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Subject: Consultation on the Guarantee of Origin (GO) scheme: Exposure Draft legislative instruments specific to renewable electricity – Tranche 3

The Australian Industry Greenhouse Network (AIGN) welcomes the opportunity to provide further comment on the Department's consultation on the Guarantee of Origin (GO) Scheme exposure draft legislation and consultation documents related to renewable electricity.

This submission makes the following key recommendations:

- **Support for transparent accounting:** AIGN welcomes credible, internationally recognised emissions accounting frameworks, including recognition of storage technologies and REGO certificates under NGERs.
- **Competitiveness through markets:** The GO Scheme can strengthen Australia's position in global low-emissions markets. Members seek engagement on future opportunities and demand evolution.
- **Whole-of-scheme perspective:** A comprehensive consultation process would allow assessment of the scheme's objectives, ensure consistency between REGO and PGO, and support international alignment.
- **Proportionate design of PGO:** Requirements should remain voluntary, flexible, and internationally aligned, with additional obligations only when they are linked to incentives such as the hydrogen tax credit.
- **Stronger consultation framework:** A more coordinated, inclusive approach would enhance stakeholder engagement and deliver more effective policy outcomes.
- **Inclusion of LCLFs:** As with electricity, liquid fuels face tracking challenges. Certificate tradability and closer stakeholder engagement are needed to support market growth.



About AIGN

AIGN is a network of industry associations and corporations that provides a forum for discussion on key climate change issues, as well as information and analysis on national and international climate change policy, and the role industry can play in the transition to net-zero emissions by 2050.

We are committed to supporting cohesive, efficient, and predictable climate policies that align with Australia's Paris Agreement targets. We believe a harmonised approach across federal, state, and territory jurisdictions is essential to achieving our emissions reduction targets while maintaining investment stability and minimising sovereign risk.

The transition to a net-zero economy is complex and ambitious, requiring collaborative management and open dialogue. AIGN corporate members are on the frontlines of this transition; association members are valuable sources of expertise on the specific needs and challenges of their respective industry sectors as they move towards a net-zero future.

Support for Credible and Transparent Emissions Accounting

AIGN supports efforts to provide credible, transparent, and internationally recognised frameworks for emissions accounting. We appreciate the Department's work on the GO Scheme, particularly its framework for recognising below-baseline renewable energy and the nuances between different storage technologies. Acknowledging the ability of storage technologies to shift renewable energy from the time it is generated to when it is needed reflects a significant contribution of the energy sector to reducing emissions across its supply chain.

We also welcome the Department's decision to update the National Greenhouse and Energy Reporting Scheme (NGERS) Measurement Determination, enabling the recognition of REGO certificates in entities' emissions accounting from the scheme's commencement.

Importance of Market-Based Mechanisms for Competitiveness

The objective of the GO Scheme is to support markets and international trade in low-emissions products and renewable energy. AIGN has long supported market-based mechanisms and transparent accounting frameworks, particularly where they can enhance Australia's competitiveness in global low-emissions markets.

AIGN members are keen to engage further with the Department on the opportunities the Government expects the GO Scheme to unlock, and how demand for certification may evolve domestically and internationally.

This discussion could usefully be considered within the Government's Net Zero by 2050 Plan and accompanying sector plans.



Whole-of-scheme perspective

The GO Scheme's design in tranches has enabled focus on discrete technical elements but has limited the ability to assess whether the scheme, as a whole, is achieving its objectives. Short consultation timeframes, driven by the November 2025 implementation deadline, have also constrained stakeholder engagement.

AIGN strongly encourages the Government to provide a whole-of-scheme consultation opportunity. Such a process would:

- Allow comprehensive feedback on whether the scheme incentivises low- and zero-emissions investment,
- Support consistency across national reporting and certification frameworks,
- Facilitate input on participation, data integrity, and international comparability.

This would also provide an opportunity to address potential inconsistencies, such as differing treatments of risk and terminology between REGO and PGO.

Proportionate and consistent approach to the PGO

The PGO appears to face significantly more onerous requirements than the REGO. In particular:

- Assurance approaches to scope-3 emissions should remain proportionate and flexible, allowing for small technological changes without triggering new audit obligations.
- As a voluntary scheme, the design should promote participation, not deter it.
- Alignment across scheme components and with international standards is critical for clarity, equity, and comparability.

AIGN recommends that additional requirements be imposed only where participants seek to access the hydrogen production tax incentive

A constructive path to stronger consultation (and better outcomes)

The current consultation (1–14 September) has been strikingly short and overlaps with numerous other major consultation processes, including the Productivity Commission inquiries, transition planning guidance, the NEM Review, parliamentary inquiries, and state consultations. This convergence stretches stakeholders' capacity to engage effectively.

AIGN advocates for a more coordinated, iterative, and multi-stakeholder consultation process to:

- Enhance engagement,
- Streamline consideration of cross-cutting issues, and
- Foster robust, effective policy outcomes.



Inclusion of Low Carbon Liquid Fuels (LCLFs)

AIGN notes that REGO certificates are tradable because electricity's claimable attributes are decoupled from physical delivery. Similar challenges exist for other energy carriers, such as liquid fuels, where molecules, like electrons, cannot be individually tracked.

Low carbon liquid fuels are often blended or co-mingled, yet markets for these products are likely to grow with appropriate support, such as certificate tradability.

AIGN seeks clarity on the role of the GO Scheme in supporting the LCLF industry. If the scheme is intended to inform or underpin future compliance mechanisms, this should be communicated transparently and subject to consultation. We encourage the Department to engage with liquid fuel industry stakeholders to consider how best to integrate LCLFs into the GO Scheme

Conclusion

AIGN supports the intent of the Guarantee of Origin Scheme and recognises its potential to support emissions transparency and trade. We are committed to constructive engagement with the Department and welcome the opportunity to participate in further discussions.

Thank you for your time and consideration.

Kind regards,

Susie Smith | Chief Executive