

AIGN submission

Climate Change Authority Evidence Platform Issues Paper

April 2026

1 Summary

AIGN supports the development of an Evidence Platform that will, in practice, deliver a trusted evidence base to inform a whole-of-economy view on Australia's emissions and track progress toward meeting its emissions reduction commitments (including the 2030 target of 43% below 2005 emissions levels, the 2035 target range of 62 – 70% below 2005 emissions, on the way to ultimately reaching net-zero emissions by 2050).

Noting the CCA's planned iterative development approach, the Evidence Platform should ultimately be a factual, objective and disciplined framework that helps identify where further evidence and/or policy attention may be required.

Clarify purpose of Evidence Platform

The Platform's primary purpose is to support factual assessment of Australia's progress toward emissions reduction commitments. This should be stated more clearly and linked to the CCA's Annual Progress Advice.

Alignment with international emissions accounting

The Platform should track progress in a way that is consistent with Australia's targets and Paris Agreement architecture, enabling tracking of net emissions outcomes across all greenhouse gases, sources and sinks.

Focus on direct emissions outcomes

The Platform should prioritise direct emissions outcomes. Activity and technology-adoption indicators can provide useful supporting context but should not be used as substitutes for emissions performance.

Consistency across Evidence Platform

The Platform should apply a consistent, whole-of-economy evidentiary standard across sectors and abatement pathways to reflect that all sectors, technologies and viable abatement options are required to meet emissions reduction targets. The Platform should be capable of capturing the diversity of credible abatement pathways across the economy.

'Use existing data first' principle

The Platform should default to curating existing, verified datasets, adopting a use existing data first principle to avoid duplication of existing reporting systems. New metrics or benchmarks to fill identified gaps should be subject to transparent methodology and consultation.

Consultative ongoing improvement approach

The CCA should establish a clear governance and consultation process for the annual refinement of the Platform. This will support the Platform's credibility, usability and durability over time, as well as continued transparent, systematic collaboration.

2 Introduction

The Australian Industry Greenhouse Network (AIGN) welcomes the opportunity to comment on the Climate Change Authority's (CCA) Evidence Platform Issues Paper.

AIGN is a network of industry associations and businesses representing a broad cross-section of the Australian economy, including many of the nation's largest energy producers, energy users, manufacturers, resources companies and exporters. Many AIGN members are directly subject to the National Greenhouse and Energy Reporting Scheme (NGERS) and the Safeguard Mechanism, and are actively investing in decarbonisation across industrial, manufacturing and resource operations.

AIGN supports Australia's commitment to the Paris Agreement and climate policy settings that are effective, evidence-based, economically efficient and equitable. Our long-standing policy principles emphasise transparent policy development, broad coverage and equitable sharing of emissions reduction responsibility, support for investment certainty, and the importance of maintaining Australia's trade and investment competitiveness as the economy transitions to align with a net-zero future.

3 Role of Evidence Platform

AIGN welcomes the CCA's effort to develop a more structured evidence base to support its Annual Progress Advice. A transparent, systematic approach to developing the Platform will help improve stakeholder understanding of, and engagement with, the CCA's work. We support the four principles identified in the Issues Paper (outcomes focus, whole-of-economy view, trusted evidence base and market transparency) and encourage the CCA to ensure the Platform's design delivers on those principles in practice.

3.1 Clear objective for Evidence Platform

In AIGN's view, the CCA's objective for developing the Evidence Platform would benefit from further clarification and refinement.

The Platform should be anchored to a clear objective: tracking Australia's progress toward meeting its emissions-reduction commitments. Developing the Platform can help identify where further evidence or policy attention may be required (e.g. data gaps; sectors not delivering expected emissions reductions).

The Platform should remain a factual, neutral and disciplined evidence framework. It should not become a broad public scorecard of Australia's transition in a way that embeds value judgements, overstates what particular indicators can show, or blurs the distinction between evidence and advice.

3.2 Evidence Platform to inform advice

The Platform should provide evidence that can be interpreted and extrapolated via other processes, such as the CCA's Annual Progress Advice.

Within that process, the CCA could consider progress toward emissions reduction goals, as well as how the transition is linked to productivity, international competitiveness and the cost of living. Useful metrics for such considerations include, for example, an average cost per tonne, expected cost of abatement of achieving our Nationally Determined contribution (NDC), lowest cost abatement measures, etc.

4 Purpose and scope of Evidence Platform

AIGN supports the development of an Evidence Platform to inform the CCA's annual advice to government. However, the purpose of the Platform should be stated more clearly.

The Issues Paper describes the Platform as a way to monitor Australia's progress toward a "prosperous, resilient, net zero future" and to provide a "balanced picture of Australia's transition". This articulation is broader than necessary for an evidence tool intended to support Annual Progress Advice and may undermine the relevance of metrics to the CCA's legislated role of advising on matters relating to climate change policy, including carbon credits and greenhouse related reporting.

4.1 A factual Evidence Platform

There is an important distinction between an objective evidence base that can be used to assess Australia's progress against climate commitments, and an instrument that seeks to evaluate whether Australia's transition is proceeding in a predetermined way against multiple social, economic and policy markers.

These are distinctly separate functions. The former should be disciplined, evidence-led and closely tied to measurable outcomes. The latter would inevitably involve broader judgements about priorities, trade-offs and distributional effects. It would also increase the risk that the expert advice of bodies responsible for delivering broader sectoral and/or economic policy and regulatory reforms may be duplicated.

AIGN's view is that the Platform's role is explicitly the former. It should be built on data relevant to how Australia is tracking to meet its emissions-reduction commitments, drawing on existing reporting frameworks and focusing on factual monitoring.

The Platform should not include qualitative judgements about what governments, businesses or communities should do in response to this evidence or offer interpretive policy advice. Such assessments and advice properly belong in the CCA's Annual Progress Advice, where evidence can (and should) be interpreted in context and policy options explored.

Further, the CCA's advice should align with broader overarching reforms. For example, advice regarding decarbonisation of the energy sector must complement implementation of the National Electricity Market (NEM) Review recommendations.

This distinction is crucial for institutional clarity. The CCA has an important role as an independent adviser. The Evidence Platform should strengthen that role by providing a trusted factual base. Interpretation of the evidence, and advice based upon it, are valid use cases for the Evidence Platform, and should not be functions of it.

4.2 Data sourcing

AIGN strongly supports the CCA's intention to use reliable data sources and to complement, rather than duplicate, existing domestic reporting. The Platform should adopt a clear 'use existing data first' principle.

The Platform's default role should be to curate and present established, verified datasets, including, where relevant:

- NGERS data;
- the National Greenhouse Gas Inventory;
- DCCEEW emissions projections and related official datasets;
- existing energy market and transport datasets;
- ACCU supply side data, including from the National Vegetation Information System (NVIS); and
- other publicly available, authoritative sources.

This will be the most efficient way to build a trusted evidence base while avoiding unnecessary duplication and additional compliance burden.

Over time, AIGN understands the creation of new metrics or benchmarks may be considered. This should be clearly communicated to avoid the perception that the initial metrics represent the definitive suite of trends impacting economy-wide decarbonisation. The Evidence Platform should support the Government's intent for all sectors to contribute to the emissions reductions needed to reach Australia's international commitments expressed through our NDCs by enabling all sectors to be monitored. Those with nascent metrics and/or where policy approaches are still being developed should be calibrated over time as part of the planned continuous improvement of the Platform.

New metrics should be developed through a rigorous and consultative process. A transparent workflow should be established including clearly communicating the intended methodology with an explanation of assumptions and limitations, robust modelling and testing against real-world operational conditions where appropriate, and meaningful consultation with data providers and affected stakeholders before adoption.

This is especially important where metrics are currently listed ‘to be determined’ or where benchmarks that cannot track emissions performance are proposed. Poorly designed metrics could reduce confidence in the Platform and create confusion about whether the CCA is tracking evidence or setting aspirations. Therefore, the CCA should take a conservative approach to selecting benchmarks for this first iteration of the Platform, to ensure high integrity information is used, with the understanding that the evidence base will evolve over time, including the addition of new metrics.

Where relevant, metrics should reflect the reality that decarbonisation pathways are often non-linear, shaped by long investment cycles, technology readiness, infrastructure dependencies, market conditions and global supply chains.

4.3 Classification and transparency of indicators

AIGN supports the use of both leading and lagging indicators. However, these categories should be applied more precisely. An additional ‘activity-based’ indicator should also be considered.

Some indicators currently described as lagging may be better understood as leading or activity-based. Likewise, some leading indicators may only be indirectly linked to future emissions outcomes.

To support confidence and usability, the CCA should consider further consultation on the indicators. The first step could be to produce a concise methodology note that defines each indicator category; explains why each metric has been classified in the way it has; identifies the causal logic linking leading indicators to emissions outcomes; and distinguishes core metrics from contextual and activity-based indicators. This approach would enable better understanding of the CCA’s approach to, and use of, indicators, and aid consistent interpretation of the Evidence Platform.

5 Consistency across Evidence Platform

AIGN strongly supports the principle that Australia’s emissions-reduction task requires an economy-wide response. No single sector, technology or policy instrument can carry the task alone.

The Evidence Platform should be neutral across technologies, emissions sources and sectors. Metrics should be selected and presented according to their ability to measure or credibly indicate emissions outcomes. It is important that the Platform not implicitly favour particular technologies, energy sources and fuels, production pathways or sectoral transition approaches.

A neutral Platform supports economy-wide, least cost abatement, as well as fair comparison across the whole economy. This reinforces that all sectors and all viable abatement options have a vital role in meeting Australia’s emissions reduction commitments.

5.1 Recognising all sectors, sources and abatement options

The Evidence Platform should reflect the principle of neutrality in three ways.

First, it should be designed to track progress in a way that is consistent with Australia's emissions reduction framework and international reporting obligations, including Australia's Nationally Determined Contributions (NDCs) under the Paris Agreement. Australia's targets and NDCs are expressed on a net basis; the Platform should reflect this by capturing both emissions sources and removals. This will enable transparent tracking of gross emissions, removals, and net outcomes, aligning the Evidence Platform with the way the Australian Government measures progress to emissions reduction targets and supporting an efficient, economy-wide approach to abatement.

Second, it should apply a consistent evidentiary standard across sectors. If direct emissions metrics are considered necessary for one sector, they should be necessary for all sectors wherever possible. Inconsistent reporting risks creating a misleading picture of national progress.

Third, the Platform should reflect the diversity of credible abatement pathways across the economy. Electrification will be important in many sectors, but it is not the only pathway. A whole-of-economy evidence platform should also be capable of reflecting emissions reductions delivered through other means, such as efficiency improvements; fuel switching; carbon capture, utilisation and storage (CCUS); industrial process change; low emissions fuels; and other credible technological or operational pathways.

Further, the Evidence Platform should reflect the established basis on which emissions are measured and reported in Australia and internationally and be based on carbon dioxide-equivalency (CO₂-e). This is fundamental because it provides a common metric for tracking the atmospheric impact of all reported greenhouse gases and supports consistent accounting across sectors, activities and abatement pathways. This aligns with the policy intent of reducing the overall contribution to atmospheric greenhouse gas levels and support genuine, credible, verifiable abatement where it is most efficient to do so. This will ensure the Evidence Platform is robust, comparable, fit for purpose and consistent with Australian and international reporting practice.

It is important that the metrics do not unintentionally privilege visible technology deployment over other forms of abatement that also deliver emissions outcomes. While more nascent technologies may require alternative policy and regulatory incentives and reforms, it is important that the responsibility of all to decarbonise is clearly reinforced.

AIGN notes that the Green Growth, Adaptation and Critical Enablers domains remain less developed than the emissions-reduction domain. Given their likely significance for industry, investment and competitiveness, AIGN looks forward to further engagement with the CCA as that work progresses.

5.2 Emissions outcomes focus

AIGN agrees that the Platform should be outcomes focused. In the emissions reduction domain, that means the Platform should be anchored primarily to whether net emissions are falling in line with Australia's commitments and reflect the CCA's primary responsibility to provide climate policy advice. For example, a key metric could be assessing the value of emissions reductions implied by different policies, noting that the Productivity Commission concluded inconsistent signalling is a material barrier to an efficient, effective and equitable transition (<https://www.pc.gov.au/inquiries-and-research/net-zero/report/>).

This is a critical design principle. Many proposed indicators measure activity, technology uptake, infrastructure development or policy effort. These can be useful, but they are not, in themselves, evidence that emissions are declining. They are also generally being progressed for broader priorities beyond climate change and decarbonisation. It would be inappropriate to ignore this broader context and reinforces the position that activity and technology indicators cannot by themselves track emissions trends.

Progress tracking works best when it distinguishes clearly between outcome metrics (indicators that show whether emissions have fallen), leading indicators (indicators that credibly signal where emissions are likely to head in future), and activity metrics (indicators showing what is being built, adopted, announced or funded).

A simple test should be applied to appropriately categorise all metrics:

1. Does it confirm an emissions outcome?
2. If not, is there a documented and credible causal link to future emissions outcomes?
3. If not, is it better characterised as contextual information rather than a core metric?

Where direct emissions data or data with strong causal links to abatement outcomes exists, it should anchor the assessment. Activity metrics should be secondary and contextual.

This is important because the Platform will shape how sectoral progress is understood. If it relies too heavily on activity metrics, there is a risk that sectors or facilities could be characterised as 'lagging' even where they are actively reducing emissions through pathways not well captured by the selected indicators (e.g. fuel switching, process redesign, energy efficiency, operational optimisation, CCUS).

5.3 National and sectoral emissions metrics

AIGN supports the inclusion of national emissions and sectoral emissions as core lagging indicators. These provide the most direct evidence of progress and should remain the anchor of the emissions-reduction domain.

The Platform should make clear that sectoral emissions data is the primary basis for assessing if a sector is moving in line with Australia's emissions-reduction goals. Other indicators may help explain trends, but they should not substitute for outcome measurement.

5.3.1 Energy metrics

The proposed energy metrics do not reflect the broader transition required within the NEM, or across other grids in the nation. They also do not reflect the transition required for other energy sources. While the 82% renewable electricity target is the short-term priority, it is important to develop renewable and lower emissions energy sources now, as it will take time to prove and scale these markets.

The Energy and Climate Change Ministerial Council (ECMC) agrees the transition requires bulk renewable energy services to be integrated with shaping and firming services, as well as essential system services. At a minimum, the CCA should align the Platform metrics to support this agreement, ensuring they reinforce existing policy and regulatory signals for the energy sector. In this respect, we suggest the CCA consult with the Australian Energy Market Operator (AEMO) and the Reliability Panel on which metric/s would best reflect the effectiveness of essential system services.

The Platform should be aligned with the Government's Future Gas Strategy, which states that natural gas will be needed to support the rapid expansion of renewables through to 2050 and beyond. Metrics that track the role of natural gas based on AEMO's Integrated System Plan (ISP), should be included in the Platform.

5.3.2 Transport metrics

The proposed transport indicators do not measure actual transport emissions. They largely capture light vehicle electrification activity (e.g. share of new vehicle sales that are battery electric vehicles, share of registered light vehicles that are battery electric vehicles, electric vehicles per charger) and may overstate progress if interpreted without regard to the emissions intensity of the electricity system. 'EVs per charger' is, at most, an infrastructure indicator, not an emissions outcome metric.

These indicators provide information about parts of the transport transition, but they cannot, on their own, show whether transport sector emissions are falling in line with Australia's emissions-reduction trajectory.

AIGN recommends that transport sector emissions be treated as the core metric, with EV uptake and charging infrastructure indicators retained only as supporting context. The CCA should also reconsider a broader set of indicators to reflect the full sector.

5.3.3 Industry and waste metrics

AIGN supports efforts to identify stronger indicators for industry and waste, so that chosen metrics do not place disproportionate emphasis on technology uptake and activity over emissions outcomes.

Metrics such as the share of industrial output produced with low- and zero-emissions technologies or the diversion of organic waste from landfill may be informative, but they do not on their own demonstrate whether sectoral emissions are falling.

AIGN recommends that sectoral emissions remain the primary reference point, and that technology-uptake indicators be used cautiously and transparently, with clear explanations of what they do and do not show.

Future consideration could be given to metrics such as emissions intensity trends for trade-exposed materials and processes. The UK Climate Change Committee's Mitigation Monitoring Framework, for example, includes metrics to track imported materials and emissions from imported manufactured products. While not directly comparable with the purpose of the Evidence Platform, it may serve as a useful reference point for how to track the emissions intensity of domestic production.

5.3.4 Resource metrics

AIGN considers the resources metrics are, comparatively, better able to provide a comprehensive overview of sectoral emissions and abatement, because they draw more directly on reported emissions and abatement data. Where abatement data is not reported, tracking emissions over time can help establish if emissions reduction activity has occurred.

Some AIGN members have expressed concern about the proposed presentation of specific constituent and subset emissions, which may be potentially distortive if used to support the recommendation of higher cost abatement solutions. These emissions should form part of the overall tracking of sector progress on emissions and abatement.

This provides a useful model for other sectors. Where feasible, metrics should be tied to direct emissions or abatement data from established reporting systems such as NGERS and be consistent with internationally agreed atmospheric emissions tracking.

5.3.5 Agriculture and land metrics

AIGN notes that the proposed metric on uptake of technologies to reduce the methane intensity of cattle does not measure actual methane emissions, or reductions in methane emissions. Agriculture methane emissions are materially relevant to national emissions performance.

If suitable direct agricultural methane metrics are not yet available, the Platform should acknowledge that limitation clearly and avoid unintentionally implying that technology uptake is an adequate substitute for emissions outcomes.

AIGN encourages the CCA to continue working with relevant agencies and sectors to identify stronger outcome-based measures over time.

5.3.6 Built environment metrics

The proposed metric to measure the number of gas disconnections does not measure emissions reductions in a technology-neutral manner. Efforts to incentivise zero emission biomethane would not be captured by this metric. Gas grid emissions intensity would better reflect progress towards emissions reductions.

6 Use and further development of Evidence Platform

AIGN recognises the importance of policy, governance, financial and social factors in shaping Australia's climate response. The Evidence Platform should be careful not to move from evidence into assessment on these matters.

6.1 Policy and governance monitoring

The Issues Paper notes that policy and governance monitoring may consider whether government responses are enabling and accelerating climate action and refers to questions such as whether the costs and benefits of the transition are shared fairly.

While these are important issues, they involve normative and policy judgements that sit more naturally in the CCA's advisory function, or with the Department, than in a factual Evidence Platform. We appreciate that the Evidence Platform will inform these policy judgements, but the distinction should be clearly communicated and maintained.

The Platform should report observable evidence and clearly defined data gaps. The Annual Progress Advice should remain the space where the CCA interprets that evidence and offers policy conclusions.

The CCA could usefully coordinate with other institutions, including the Net Zero Economy Agency and Treasury-led sustainable finance and modelling areas, to define roles and avoid duplication or mixed signals.

Finance and investment metrics should use existing reporting obligations and frameworks and avoid parallel measures, deferring where possible to the authoritative sources for this data. A facilitative approach will provide a clear picture of where transition-aligned investment is flowing, without requiring additional reporting.

6.2 Public use of the Evidence Platform

The Platform should be presented in a way that minimises the risk of selective interpretation or overstatement by external users.

While the CCA cannot control how others may seek to use, quote or extrapolate from the data once it is published, it has a responsibility to ensure the information it publishes does not exacerbate the prevalence and impacts of misinformation and disinformation relating to climate change and energy (as identified through a recent parliamentary inquiry on information integrity on climate change and energy). The Platform should be straightforward, neutral and methodologically disciplined. This includes making clear the boundaries and/or limits of indicators, avoiding presentation choices that imply policy conclusions, and distinguishing between observed outcomes, leading indicators and broader contextual information.

An evidence-based, objective Evidence Platform can elevate informed public discussion without fostering the perception that it endorses any policy narrative or preferred transition pathway. It can also support more effective, efficient and equitable collaboration between governments, communities and industries.

6.3 Consultation and annual refinement

AIGN welcomes the CCA's decision to follow good practice and consult at an early stage of Platform development. We note the Platform is intended to be refined annually and to inform the CCA's Annual Progress Advice. This makes the governance and consultation arrangements especially important. The CCA could consider establishing a standing technical working group or similar body to support ongoing methodological development.

A clear, structured process for annual refinement should include publication of a forward consultation timetable; regular opportunities to examine the overall governance framework, as well as any selected metrics; sufficient time for stakeholders to test proposed metrics, data sources and benchmarks; and targeted consultation where new metrics may rely on operation or commercially sensitive datasets.

A systematic development and consultation process would support the Platform's credibility, usability and durability over time.

7 Conclusion

AIGN supports the CCA's objective of building a stronger evidence base to inform its Annual Progress Advice and to improve transparency about Australia's progress toward its climate goals.

The Platform has the potential to play a valuable role in Australia's climate policy architecture. To realise that potential, it should remain tightly focused, methodologically disciplined and grounded in direct emissions outcomes wherever possible.

AIGN welcomes future opportunities to engage with the CCA and the government on these matters.