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8 May 2026

National Greenhouse Accounts
Department of Climate Change, Energy, the
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Submission via DCCEEW's Consultation Hub

To Whom It May Concern

National Greenhouse and Energy Reporting Scheme (NGER Scheme) - 2026 Public Consultation

Woodside Energy (Woodside) welcomes the opportunity to comment on the proposed amendments to the National Greenhouse and Energy Reporting (Measurement) Amendment (2026 Update) Determination 2026 (the Update Determination) and National Greenhouse and Energy Reporting Amendment (2026 Measures No. 1) Regulations 2026 (the Update Regulations).

Woodside acknowledges and appreciates the Department of Climate Change, Energy, the Environment and Water's (DCCEEW) ongoing efforts to ensure the National Greenhouse and Energy Reporting Act 2007 (Cth) (NGER Act) and associated legislation remain fit for purpose.

Woodside supports clear, stable and pragmatic emissions reporting frameworks and recognises the important role the NGER Scheme makes to the integrity and confidence in Australia's greenhouse gas emissions inventories. Central to this integrity and confidence are the review processes that enhance the accuracy and reliability of data reported under the NGER Scheme. Woodside appreciates DCCEEW's responsiveness to industry feedback.

Examples of reforms that could further enhance the Scheme's operation include:

- Strengthening integrity and confidence by allowing reporters to use the methods prescribed by OGMP 2.0, a global methane measurement management reporting and verification framework, as the basis for reporting directly for NGERS compliance (see Section F).
- Refining the application of Australia-wide residual mix factors for electricity associated with large-scale generation certificates so that they deliver more accurate state- or grid-based factors (see Section E).

Woodside's detailed consultation responses are provided in Table 1 – Woodside's Recommendations (attached). We value ongoing collaboration with DCCEEW and would welcome the opportunity to discuss this submission further.

Yours sincerely,

[REDACTED]

Peter Metcalfe
Vice President, Climate, Sustainability, and Energy Policy

Table 1: Woodside's Recommendations

Consultation Question (selection)	Woodside Response
Section A: Renewable fuels	
General feedback	Aligning the renewable liquid fuel framework more closely with a market-based approach, including allowing contractual (book-and-claim) claims with appropriate safeguards, rather than requiring exclusive reliance on physical delivery and facility-specific consumption would offer greater flexibility and support growth of the renewable liquid fuels market. There is an opportunity to align feedstock emission factors with EU Renewable Energy Directive Annex VI that allows for negative emissions (rather than just zero) for certain production pathways (e.g. biogas from wet manure feedstocks for electricity) in recognition of displacement due to biomethane production and methane conversion to CO₂. This would also improve the commerciality of biogas projects and facilitate greater scale and pace of the industry.¹ The amendments proposed in this consultation relating to co-processed liquid fuels and bioLPG are welcome; however this could be further enhanced by extending co-processing to biomethane as an enabler of potential bioLNG developments. To support consistent treatment across renewable fuels, we recommend aligning the temporal link requirement with existing biomethane provisions, which allow Renewable Gas Guarantee of Origin certificates (RGGOs) to be used within 3 years and 3 months (1,185 days) rather than 24 months.² Investment could be further encouraged through removal of the east coast/west coast constraint for RGGOs.
Section C: Oil and gas fugitive emissions	
General feedback	Regarding the proposed amendments Section C. Oil and gas fugitives' emissions we welcome: 1) The change to the calculation of N₂O emissions to exclude the oxidation factor. 2) The extension of the Method 2B calculation method into the proposed natural gas supply chain segments as discussed during previous engagements. Further to this we would like to highlight the following opportunities to improve their implementation in relation to the key principles of accuracy and comparability as well as enhancing the readability of the Determination. 1) Extending the Application of Method 2B for Oil and gas fugitives' emissions from flaring to Section 3.45 to allow application of the method in oil and gas exploration and development, similar to the associated updates to the other natural gas segments (i.e via cross-reference to 3.87B). It is noted in the consultation document that this is intended however there is no reference to Method 2B in Section 3.45 in the Exposure Draft. 2) Aligning the calculation of CO₂ emissions detailed in Method 2 (section 3.87 which cross-references Division 2.3.3) and Method 2B (section 3.87B (2) which are the same basis expressed in different ways: emissions per unit energy/mass approach versus 'carbon-weight fraction of the hydrocarbon component' approach, respectively.

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02018L2001-20231120>

² <https://www.greenpower.gov.au/sites/default/files/2025-07/Renewable%20Gas%20Certification%20Rules%20V3.0.pdf>

	3) Aligning the calculation of CH₄ emissions detailed in Method 2A (Section 3.87A, and exposure draft 3.45A) and Method 2B (section 3.87B(1)) which for the same input data will result in different emissions. This is due to Method 2B enables a methane-composition-focussed calculation using the weight fraction of methane in the hydrocarbon fuel flared, whereas Method 2A (e.g. Section 3.87A) assumes a standardised methane factor for total quantity of hydrocarbons as specified in table in subsection 3.86 (2). 4) Amended nitrous oxide emissions section under 3.45A (3) needs to also recognise that total quantity of hydrocarbons (Q_h) within fuel type [flared gas] can also be determined in accordance with Method 2B (which has different measurement requirements compared to Method 2 prescriptive requirements under Division 2.3.3). Additionally, the proposed Exposure Draft footnote should be slightly amended to allow that Subsection (2) does not have to be used where methane emissions are calculated in accordance with Method 2B. Nitrous oxide emission calculation updates proposed in the Exposure Draft for Section 3.45A will also need to be replicated across other segments within the Determination (e.g 3.87A)). 5) 3.87B Method 2B; suggest adding footnote 'Note 3' to clarify: 'If this method [Method 2B] is used to estimate methane and CO₂ emissions, then 3.45A subsection (3) must be used to estimate nitrous oxide emissions' (i.e. where total quantity of hydrocarbons Q_h is instead estimated in accordance with Method 2B). Note a simpler approach for consideration may be to detail one calculation set for all the gaseous fuel flare Method 2 calculations with a reference that for the alternative method a mass balance calculation may be used. For example: • For CO₂ Method 2, (Section 3.87). • For CH₄ Method 2A, (Section 3.87A), or Method 2B (Section 3.87B). • For N₂O Method 2A (Section 3.87C) – by adding the updated N₂O proposed calculation as detailed in Exposure draft (section 3.45A(3)). In this section, add the following note applicable for Method 2B (Mass balance approach). Note: "Method 2B is similar to Method 2/2A, however Q_h, QCO₂ and Qmethane is calculated via mass balance approach as set out in the 2021 API compendium." These updated sections could then be duly cross-referenced throughout the Determination for natural gas fuels segments (noting varying EF tables subsection references for N₂O and CH₄ if standard methane factors are to be used instead of Qmethane informed by gas composition (see bullet 3)). Further to the proposed amendments we would recommend DCCEEW pursue greater alignment between the NGER Determination methods and international best practice. The Oil & Gas Methane Partnership 2.0 (OGMP 2.0) is the flagship oil and gas reporting and mitigation programme of the United Nations Environment Programme (UNEP). Alignment with international best practice such as the methods prescribed by the UNEPs OGMP2.0 reporting framework could include provision of pathways for: • The compliant submission of OGMP2.0 Level 5 reports within the Determination, and • The adoption of alternative methods and measurement technologies by operators subject to alignment with the general principles for measuring emission and energy.
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	We believe that providing options for NGER reporting aligned with OGMP 2.0 would be beneficial for the ongoing integrity and confidence in the scheme. We would welcome the opportunity to meet with DCCEEW to discuss how alignment may be realised.
Section E: Scope 2 emissions from consumption of electricity	
General feedback	Refinement of residual mix factors (RMFs) Woodside notes that the application of an Australia-wide residual mix factor to electricity associated with large-scale generation certificates was raised during the NGER Scheme 2023 amendments process, with stakeholders highlighting potential misalignment with jurisdiction-specific grid emissions profiles. Since that time, differences in state and grid emission intensities have become more pronounced. Woodside therefore recommends that the Department further consider the development of state or grid-specific residual mix factors, particularly where renewable electricity procurement is demonstrably linked to generation within a specific grid. Greater RMF granularity would improve the integrity of Scope 2 reporting, strengthen alignment with location-based emission factors already used under NGER, and provide clearer investment signals without undermining overall scheme robustness. Recognition of variable renewable electricity under the Safeguard Mechanism Woodside encourages consideration of how the Safeguard Mechanism and NGER reporting framework can better recognise the emissions value of variable renewable electricity imports, particularly where such imports directly displace higher-emissions generation. In Woodside's view, providing clearer recognition of variable renewable electricity — including where supported by storage or firming arrangements — would improve investment signals under the Safeguard Mechanism while remaining consistent with NGER's integrity-based accounting principles. Such recognition would support least-cost decarbonisation pathways by encouraging renewable deployment and system integration, rather than favouring specific technologies or fuels.
Section F: Other changes	
General feedback	Having the option to report methane in line with OGMP 2.0 would allow methane inventories to be reported with a higher level of confidence where it is material and data is available. We would in principle support the department exploring ongoing methodology alignment with emergent practices and technologies being developed via OGMP2.0
Annex 1. Assigned biogenic carbon content on PGO certificates	
General feedback	Woodside considers the proposed methods to be, in principle, broadly suitable for Australia, but their effectiveness will depend on proportionate and flexible application to avoid unnecessary cost or complexity. Higher-order analytical methods can deliver greater precision. However, calculation of bio-fuel contribution on an energy balance (calorific value) basis, where each fuel is tested at some frequency and the portion estimated in accordance with the NGER Principles, may be sufficient for most compliance purposes. Flexibility to use an energy balance calculation where appropriate may better support timely deployment of biomethane and co-processing projects. Free allocation and flexible mass-balance methodologies therefore have advantages over rigid product-by-product requirements, particularly for integrated facilities. Clear system boundaries, alignment with NGER and ACCU frameworks, avoidance of duplicative regulation across GO, ACCUs and the Safeguard Mechanism, and future-proofing for emerging renewable gas and bioLNG markets will enable investment certainty and regulatory efficiency