

NATIONAL GREENHOUSE AND ENERGY REPORTING (NGER) SCHEME 2026 UPDATE | CONSULTATION

Australian Energy Producers | 8 May 2026

Australian Energy Producers welcome the opportunity to provide feedback on the 2026 National Greenhouse and Energy Reporting (NGER) scheme updates.

The NGER scheme is considered world leading with respect to emissions monitoring and reporting oversight.¹ The Australian oil and gas industry is committed to working with the government to ensure the NGER scheme remains fit-for-purpose with respect to emissions monitoring, measurement, reporting and verification of oil and gas operations.

Australian Energy Producers recommends:

- **The expansion of the NGER framework to emerging low-carbon and renewable fuels must reflect their maturity and scale** | This will avoid undue compliance burdens that could hinder investment and development. Measures should only be introduced where they materially improve NGER integrity while supporting growth of new energy technologies.
- **The NGER scheme should not be linked to the Product Guarantee of Origin (PGO) certificate scheme for co-processed liquid fuels** | Mandating a voluntary scheme and requiring information beyond the current NGER scope is premature, particularly as PGO certificates do not yet exist and implementation is likely several years away. Participation may impose unnecessary administrative burden on nascent markets, with limited incentive under a mass balance approach. This is also inconsistent with existing NGER methods that allow a broader range of certification approaches. A transitional approach using international standards and recognising credible schemes, such as Green Power, is more appropriate.
- **The temporal link requirement for biomethane should be consistent across legislation** | The consultation paper proposes that biomethane certificates used for NGER reporting must relate to gas delivered within the previous 24 months. This differs from the existing biomethane framework, which allows a period of 3 years and 3 months. Aligning these timeframes would improve regulatory consistency and reduce unnecessary complexity for industry.
- **The update to Method 2A for flared emissions of methane and nitrous oxide from oil or gas exploration and development is welcome** | The removal of the oxidation factor from the formula for estimating N₂O will improve the accuracy of reporting under this method.
- **The expansion of Method 2B for flaring across gas extraction and development sources is welcome** | The expansion of Method 2B will improve flexibility and consistency in reporting, while it encourages the collection of more accurate data when available.
- **The proposed amendments to Section 1.19 will be difficult to meet in practice and should not proceed** | Contrary to the example provided, it is not plausible to fully assess the percentage downtime that equipment will have over the reporting year. This is particularly the case for intermittent or short-duration sources. The proposed amendment will likely lead to

¹ Minister for Climate Change and Energy, Chris Bowen, [Media release: Climate Change Authority's Carbon Crediting and Emissions Reporting reviews provided to Government](#), 2023

unnecessary reporting, or unanticipated non-compliance with 1.19(5) at the end of the reporting year. AEP suggests reconsidering whether this change would materially improve reporting accuracy, and if so, consider alternative and more practical options.

- **The proposed Section 1.19 method downtime example requires clarification** | AEP welcomes DCCEE's clarification that the proposal relates solely to method downtime, measured as a percentage of operational time, rather than downtime of the emissions source itself. However, while the introductory text refers to method downtime, the hypothetical example is drafted in a way that could be interpreted as referring to source downtime, creating potential confusion for reporters and compliance obligations.

Australian Energy Producers looks forward to continuing to work with DCCEE to improve and update the NGER scheme as it relates to oil and gas emissions reporting, and to engaging with the Expert Panel on Atmospheric Measurement of Fugitive Methane.