



Mr Mike Kaiser
Secretary
Department of Climate Change, Energy, the Environment and Water
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Email: GuaranteeOfOrigin@dcceew.gov.au
Submission via [online portal](#)

27 April 2026

Dear Mr Kaiser

Re: Public consultation on the Exposure Draft of the Guarantee of Origin Methodology Determination Amendment (Biogas, Biomethane and Iron Ore)

Thank you for the opportunity to provide feedback to the Department of Climate Change, Energy, the Environment and Water ("the Department") on the *Exposure Draft of the Guarantee of Origin Methodology Determination Amendment (Biogas, Biomethane and Iron Ore)* ("the Amendment"). The Waste Management and Resource Recovery Association of Australia (WMRR), as the national peak body for Australia's \$21 billion waste and resource recovery (WARR) sector, is pleased to express its support for the proposed Amendment.

WMRR represents over 2,300 members across more than 400 organisations, spanning industry, government, research institutions and NGOs. Our sector plays a critical role in Australia's economy through infrastructure delivery, collection, resource recovery, manufacturing of secondary materials, energy recovery, and community engagement. Central to our advocacy is the connection between carbon reduction and the transition to a circular economy. By prioritising waste avoidance and the recovery and reuse of materials, the WARR sector extends material life, reduces reliance on virgin resources, and delivers significant emissions reductions while supporting jobs and economic resilience.

The Guarantee of Origin scheme (GO Scheme) offers participants a market advantage for demonstrating low-carbon credentials by enabling auditable carbon-intensity disclosure attached to a product batch through regulated pathway definitions, auditable calculation rules, and certificate-level disclosures which provides a high level of granularity over carbon impacts and provide export-grade emissions transparency. WMRR strongly supports the expansion of the GO Scheme to include biogas (produced via anaerobic digestion of biogenic feedstocks) and biomethane (produced by upgrading biogas to natural gas quality) pathways. In WMRR's view the introduction of these technology-neutral methane production pathways, underpinned by modular and lifecycle-based emissions accounting, aligned with the National Greenhouse and Energy Reporting (NGER) framework, represents a robust and credible approach that will:

- provide auditable, product-level carbon intensity data will deliver transparency and integrity, positioning Australian products to meet growing domestic and international demand for low-carbon credentials.
- closely align with EU-style product certification in that it creates a product pathway, defines a functional unit, calculates production, delivered, and post-production emissions intensity, and attaches product-specific attributes to certificate.

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- reinforce the importance of the WARR sector in methane abatement and support the development of circular, low-carbon energy solutions. WMRR welcomes the inclusion of waste and residue feedstocks (including landfill gas and lagoon gas) within the lifecycle accounting framework. Recognising these feedstocks with the assumption of zero upstream emissions, appropriately reflects their role in capturing and repurposing emissions that would otherwise be released to the atmosphere.

WMRR supports the phased approach to cost recovery for biogas and biomethane pathways, noting that temporary fee relief until 30 June 2031 should assist in facilitating early industry participation and investment, helping to scale these emerging sectors and unlock their emissions reduction potential.

Overall, WMRR considers the Amendment a positive and necessary step in strengthening Australia's low-carbon certification framework. By supporting circular economy outcomes and enabling high-integrity emissions tracking, the GO Scheme will help drive investment, innovation and market confidence in low-carbon products derived from resource recovery.

WMRR encourages the Department to consider expanding the GO Scheme to cover a broader range of resource-recovered products, noting that a credible, internationally aligned emissions accounting framework can help level the playing field between virgin and secondary raw (recycled) materials, particularly those products with Australian recycled content. Extending the methodology to include remanufactured and recycled materials—such as plastics, metals and composites—would strengthen circular economy outcomes by enabling Product Guarantees of Origin (PGOs) to capture emissions across the full lifecycle, from embodied carbon in inputs through to end-of-life recovery. This would provide robust validation of circularity claims, support preferential market access through green procurement and emerging carbon border mechanisms, and, if linked to mandated recycled content targets, allow PGOs to function as a mechanism for meeting compliance obligations.

Please contact the undersigned if you wish to further discuss WMRR's comments.

Yours sincerely

Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia