



Mr Mike Kaiser
Secretary
Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
Canberra ACT 2601
Email: GuaranteeOfOrigin@dcceew.gov.au
Submission via [online portal](#)

18 July 2025

Dear Mr Kaiser

Re: Comments on the Exposure Drafts of the legislative instruments that will support the Guarantee of Origin (GO) scheme

Thank you for the opportunity to provide feedback to the Department of Climate Change, Energy, the Environment and Water ("the Department") on the Exposure Drafts of the legislative instruments that will support the Guarantee of Origin (GO) scheme. WMRR's comments essentially pertain to the *Future Made in Australia (Guarantee of Origin) Methodology Determination 2025* ("Draft Determination") which highlights that the first Product GO (PGO) pathway will be hydrogen production from electrolysis, with plans to expand the methodology with further chapters to include other products such as low carbon liquid fuels, green metal resources and biomethane.

The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$21 billion waste and resource recovery (WARR) industry. With more than 2,300 members from over 400 entities nationwide, we represent the breadth and depth of the sector, including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs), including research bodies. Our members are involved in a range of important WARR activities within the Australian economy, including infrastructure investment and operations, collection, manufacturing of valuable secondary raw products from resource recovery, energy recovery as well as community engagement and education.

Being at the forefront of the ongoing evolution towards whole-of-system action and the development of a circular economy, WMRR strongly advocates for a systems-based approach to managing materials in Australia to prolong life and mitigate carbon impacts. This includes fierce advocacy for the waste and resource management hierarchy, which promotes avoidance of waste, and the diversion of materials from landfill through design for reuse, recovery, recycling and composting of resources. WARR activities playing a crucial role in the broader economic system both in terms of providing materials management through operating appropriate infrastructure, and in terms of supplying market ready recovered or remanufactured materials to Australian industries, for example construction and manufacturing. Given the clear benefits of recovered materials (reduced emissions, job creation and building local resilience), it is imperative that products derived from resource recovered materials are able to compete in local and global markets with virgin products, and that investment in innovative recovery technologies is promoted and supported.

Whilst much of WMRR's advocacy has called for mandatory schemes that enhance producer responsibility for materials placed on market and regulatory settings that support investment in essential WARR infrastructure, government led voluntary market mechanisms can also play a significant role in shifting to a circular economy that designs out waste. The rise of 'greenwashing' and misleading carbon claims in product marketing-

WMRR NATIONAL OFFICE
57 ST JOHNS ROAD
GLEBE NSW 2037
(02) 8746 5000
INFO@WMRR.ASN.AU

WMRR.ASN.AU

highlighted recently by the EnergyAustralia “Go Neutral” litigation - reflects that many businesses and consumers are actively seeking to reduce their carbon footprint and are willing to pay for renewable energy and credible sustainable products.

Given that Australia’s *Circular Economy Framework* has set a number of targets, for example to double our circularity rate by 2035, shrink our per capita material footprint by 10%, lift our material productivity by 30% and safely recover 80% of our resources, Australia’s transition to a low-carbon and circular economy necessarily requires government leadership to facilitate trade in low-carbon and circular products— especially for exports, carbon border compliance, and in aid of corporate sustainability goals. It is WMRR’s understanding that participation in the Guarantee of Origin scheme (GO Scheme) will have the ability to offer a market advantage for companies wanting to demonstrate low-carbon credentials or eligibility for ‘green’ procurement; Product GO (PGO) certificates will apply a “chain of custody” model to prove where a product was made and the emissions associated with its production, transport and storage, and Renewable Electricity GO (REGO) certificates will allow users to make verifiable claims about how, where and when renewable electricity is produced. Currently, the Draft Determination sets out the proposed pathway for the production of hydrogen from electrolysis, and WMRR notes and supports the development of product pathways under the method for the production of low carbon liquid fuels and biomethane in the near term.

Whilst the immediate focus of the GO Scheme supporting renewable energy is noted as integral to achieving decarbonisation goals, WMRR would like to see it expanded beyond energy systems to include all materials in the circular economy, as this could improve market access, assist with trade relations and enable recognition of recovered content against circularity goals. As such, WMRR makes the following comments for the Department to consider for the future development of the GO Scheme:

Prioritise the development of product pathways for LCLFs and Biomethane ahead of Australia’s 2030 resource recovery and landfill diversion targets

In the immediate term, expanding the method to cover low carbon liquid fuels such as sustainable aviation fuel (SAF), and biomethane should be prioritised. Enabling the development of technologies that facilitate energy recovery from sustainable fuels will buoy the economic viability of innovative resource recovery technologies such as Anaerobic Digestion (AD), which can play a crucial role in diverting organics) from landfill.

Whilst mandated source separated food and organic waste collections will be introduced across Australia to meet the 2030 National Waste Policy Action Plan target to halve the amount of organic waste sent to landfill, access to appropriate infrastructure remains a challenge, and developing facilities can be difficult without significant capital investment underscored by certainty of end product markets. Given that biomethane can be purified to meet the Australian Standard for general-purpose natural gas (AS4564:2020), making it fully compatible with existing gas infrastructure, biomethane as a byproduct from AD could meaningfully contribute to decarbonising gas reliant industries, whilst making AD projects more viable. For example, the implementation of Guarantees of Origin and Proof of Sustainability (POS) certificates for biomethane in the Netherlands has effectively encouraged the development of anaerobic digestion (AD) plants processing food and agricultural waste. Between 2025 and 2030, the Dutch biomethane market is expected to grow at an annual rate of 13.4%, reaching an estimated revenue of US\$671.9 million by 2030.

Expand the scheme beyond energy system products to level the playing field between recycled and virgin materials within supply chains

In WMRR’s view, a credible and internationally consistent emissions accounting scheme that provides an objective account of a product’s carbon footprint would assist in leveling the playing field between virgin and secondary raw materials – particularly recycled content. WMRR would encourage the Department to expand the GO scheme to all materials in the circular economy and commit to the development of additional chapters



to the Draft Determination to expand the methodology to include all remanufactured / recovered and recycled products (e.g., recycled plastics, metals, composites). As PGOs are product-based, they can carry information across the entire product lifecycle and supply chain - from capturing input materials (embodied carbon) relating to extraction emissions, right through to product consumption information and product recycling and disposal. A PGO for using recycled materials would validate a product's circularity claims that give them preferential market access driven by green procurement preferences and carbon border mechanisms. Furthermore, if mandated/compliance targets for recovered content were in place, then the PGO certificates would be an offset against a liability.

We trust that the Department will appreciate that these recommendations for expanding the GO Scheme will support Australia's broader resource recovery and circularity goals, whilst aligning with objects of the *Future Made in Australia (Guarantee of Origin) Act 2024* (GO Act) to provide transparent and trusted information on emissions associated with products to enable credible claims regarding the production, to encourage decarbonisation and investment in Australian industry, and to support the development of markets for relevant products.

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

Yours sincerely

Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia

WMRR NATIONAL OFFICE
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WMRR.ASN.AU