



Overview

bp's purpose is to reimagine energy for people and our planet. Our ambition is to become a net-zero company by 2050; and to help the world get there, too. We are committed to playing our part by delivering progressively more low carbon solutions and providing cleaner, more affordable, and reliable energy. We aim to actively advocate for policies that advance net zero, including those that support the deployment of biofuels.

As such, bp welcomes an opportunity to provide feedback on the discussion paper and exposure draft of amendments proposed for the *National Greenhouse and Energy Reporting (NGER) Scheme*. bp recognizes that robust and accurate emissions reporting is essential to underpin policies that support emissions reductions and the transition to net-zero.

bp is submitting on the proposal to create a new biomethane fuel type and to allow reporting of combustion of blended gaseous fuels, that will allow NGER reporters to show reduced emissions from consumption of biomethane and gas blends with a biomethane component.

bp sees enormous potential for biofuels, including biomethane to reduce emissions and support the global transition to net-zero emissions. bp is already the largest supplier of biogas in North America and has plans to expand its global production 20-fold by 2030. Biomethane has the potential to reduce emissions by displacing natural gas and other fossil fuels. Biomethane can be combusted on-site where it is produced or be combusted when delivered to another user or be injected into shared infrastructure like the gas grid. Potential uses for biomethane are varied, spanning heavy industry, agriculture, manufacturing, and transport.

bp welcomes the proposal to include biomethane in the NGER determination giving it similar treatment to other biofuels. bp also welcomes the proposal to include specific arrangements for blended gases that include biomethane noting it seems likely in the Australia context that some NGER reporters will receive biomethane blended with natural gas.

bp also welcomed the recent biomethane package of amendments to the emissions reduction fund waste methods as a pathway to incentive displacement of natural gas with biomethane through the creation of ACCUs.

These two developments will support those gas users who are willing to pay a premium for biomethane to reduce their emissions from their gas use. It will be important that the gas user who pays for the biomethane is able to claim the full emission reduction from the biomethane even when it is delivered via a shared pipeline. bp would welcome further consideration on how the NGER and ACCU frameworks can support this outcome.

Equally important will be to ensure the emissions reporting and crediting of ACCUs for the injection of biomethane into the natural gas network does not lead to double counting of the associated emissions reductions.

Closing

Rapid reductions in emissions are urgently required for the world to meet the Paris goals. bp welcomes well-designed, stable, and long-term policy frameworks to incentivize and support biofuels. We look forward to working with the government on policy measures that will support a rapid transition to net zero emissions.

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