### What we did

**Released an Issues Paper** in May, which received 323 submissions, of which 62 responded to questions on the NGER Review. The breakdown of these submissions by organisation type is shown below.

![submission breakdown chart]

- **15%** Business
- **17%** Not for profit
- **29%** Individual
- **31%** Peak body
- **8%** Other

**Released a Public Survey** in August, which received 69 responses. The breakdown of survey responses by organisation type is shown below.

![survey response breakdown chart]

- **48%** An organisation
- **23%** A corporation
- **9%** An individual
- **20%** Prefer not to say

**Hosted 3 workshops on methane measurement, reporting and verification** in July and August attended by more than 100 people—one with industry, one with methane measurement scientists, and one with non-governmental organisations.

**Met with over 100 individuals from 60 organisations** to discuss the review, including: scientists, NGER reporters, government agencies, think tanks and non-governmental organisations.

### Coverage

**Reporting thresholds**
- Support for reducing reporting thresholds to achieve greater coverage of a broader range of emissions data.
- Desire for reporting obligations to align and be complementary with any incoming or future mandatory climate-related disclosures.
- Concern that the complexity of the scheme may become problematic if smaller entities are required to begin reporting.

**Sectoral coverage – agriculture and land**
- Support for reporting of agricultural emissions to satisfy investors and need for climate risk disclosures.
- Concerns that reporting agricultural emissions will be complex, costly and administratively burdensome.
- A view that if agricultural emissions are reported under NGER, sequestration should also be included.

**Market-based reporting**
- Concern that current emissions accounting methodologies are not capturing renewable fuels appropriately.
- Calls for market-based reporting for liquid and gaseous fuels.
- Calls for certificate schemes for renewable fuels.

### Transparency and Confidentiality

**Majority of survey respondents said the data currently published do not meet or only partially meets their data needs.**
- Calls for the release of more information while others being of the view the current balance between data disclosure and confidentiality as appropriate.
- Concerns that the provisions for commercial sensitivity are misaligned with the shifting community expectations around the transparency of emissions.
- Many survey respondents supported publication of reported information with some limited and specific situations in which information would not be published, others supported the removal of section 25.
- Survey respondents who supported retention of section 25 pointed to the need to protect commercially valuable information.

### Methane measurement, reporting and verification

- Concerns regarding the accuracy of fugitive methane emissions reported under the NGER scheme.
- Calls for the phase out of Method 1 for reporting fugitive methane emissions, to improve the accuracy of reported emissions.
- Support for aligning the NGER scheme with new international frameworks from the United Nations Environment Program – the Oil and Gas Methane Partnership (OGMP) 2.0 and the Metcoal Methane partnership (MMP).
- Calls for increased flexibility in reporting emissions for integrated gas facilities.
- Calls for the introduction of top-down verification of emissions for fugitive methane emissions.
- Support for incorporation of satellite estimations of fugitive methane emissions into the NGER scheme, when the technology is ready.
- Calls to develop Australia’s methane measurement expertise.

### Admin & Compliance

- Identified opportunities to streamline and improve the regulator’s administration activities.
- Support for the balance being struck between costs on businesses and achieving the NGER scheme’s statutory duties.
- Broad support by reporters for the current approach and level of penalties.

Submissions to the authority’s Issues Paper can be viewed and downloaded here: [Public submissions](#)