

Pathways Call for Evidence Submission

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31 July 2026

Net Zero Commission

Submitted online: www.netzerocommission.nsw.gov.au

Decarbonisation pathways – Call for Evidence

Origin Energy Limited (Origin) welcomes the opportunity to provide comments on the NSW Net Zero Commission's (NZC) Call for Evidence to inform the development of the first NSW-specific set of decarbonisation pathway scenarios (pathways). We appreciate this consultation follows the NZC's advice that emissions reductions must be accelerated to achieve NSW's legislated targets.

Origin supports considering credible pathways to accelerate emissions reductions at both the state and sectoral level, as well as opportunities and barriers for these pathways. These pathways must recognise and align with the basis of Australian emissions policy that standardises greenhouse gases (GHG), activities and sectoral contributions to a tonne of carbon dioxide equivalent of abatement. The NZC should also consider the Productivity Commission's advice that a least-cost pathway to net zero requires consistent and comprehensive market-based incentives which are focused on reducing emissions, not how (or in which sector) emissions are reduced.

In seeking to understand the opportunities and barriers to improving the effectiveness of NSW's transition to net zero, the NZC could assess whether NSW policy portfolios provide consistent and comprehensive incentives, as well as opportunities to reduce duplication or address gaps. This could include whether departments and agencies are consistently assessing their policies against the NSW Carbon Values and coordinating to support effective, efficient and timely abatement activities. For example, the NSW environment protection authority (EPA)'s new climate change requirements for licensees appears to duplicate Commonwealth climate and financial frameworks and relies on timely planning and approvals to be achieved.

Reducing duplication and providing guidance on how policies and programs align would support more coordinated, least cost economy wide efforts to decarbonise. But the introduction of too many changes can also make our customers reticent to engage further in prioritising and accelerating decarbonisation activities over other demands on their businesses and capital. More transparent and consistent communication supported by clear, realistic information on the scale of investment and policy costs required to achieve legislated targets could help overcome this by supporting trust and engagement with climate policy, as well as improving relationships to sustain (and accelerate) their efforts.

In this context it is also important to highlight where continued collaboration across policy areas can help accelerate emissions reductions, such as energy policy for cleaner energy solutions accompanied by climate policy to certify and value emissions benefits, and industrial policy to encourage uptake. There are many instances when developing solutions for all sectors, such as accelerated planning and approvals, as well as greater collaboration across policy portfolios and programs can unlock and accelerate greater abatement across the economy.

For example, Origin is the foundational offtaker for Jemena's Malabar biomethane injection demonstration plant and is working with Viva on a proof of concept design for co-processed and bio-

LPG in Geelong.¹ Both of these projects and partnerships are the first of their kind in Australia, will be used to provide 'drop-in' solutions for our customers, and have government backed certification that can help support associated claims.

The extension of the renewable fuel scheme (RFS) to biomethane and the potential inclusion of low carbon liquid fuels (LCLF) to encourage supply, combined with reforms to energy performance incentives (e.g. ESS and PDRS) may support further uptake of abatement opportunities of this nature if designed, coordinated and delivered effectively. It is particularly important that these programs are refined and address challenges identified to date, such as the absence of a nationally consistent policy framework to support all renewable gas options, as these 'drop-in' solutions can support hard to abate sectors which can face additional technological and commercial barriers to electrification.

If you wish to discuss any aspect of this submission further, please contact [REDACTED]
[REDACTED].

Yours Sincerely,

[REDACTED]

Shaun Cole
Group Manager, Regulatory Policy

¹ Our media release published 22 March 2023 provides more information about our partnership with Jemena. Viva Energy published a media release on 27 November 2025 advising we have signed a Memorandum of Understanding (MoU).