

29 April 2022

Department of Industry, Science and Resources
National Greenhouse and Energy Reporting
Emissions Reduction
Industry House, 10 Binara St
CANBERRA ACT 2601

via online submission portal

ARA SUBMISSION ON PROPOSED CHANGES TO THE NATIONAL GREENHOUSE AND ENERGY REPORTING (NGER) SCHEME

The Australian Retailers Association (ARA) welcomes the opportunity to comment on proposed updates to the National Greenhouse and Energy Reporting (NGER) scheme.

The ARA is Australia's oldest, largest, and most diverse peak retail body, representing a \$360 billion sector that employs 1.3 million Australians. We represent the full spectrum of Australian retail, from our largest national and international retailers to our small and medium sized members, who make up 95% of our membership.

The ARA is committed to play a leading role in the development and implementation of a meaningful sectorial response to climate action, as demonstrated by the launch of our [Net-zero Roadmap](#) for the Australian retail sector and our support of the UN-backed [Race to Zero](#) campaign in partnership with the World Business Council for Sustainable Development.

Our members are equally committed to making an efficient transition to the low-carbon economy of the future and many of our largest members have been reporting under the NGER framework for more than a decade.

Following consultation with members of our [Sustainability Advisory Committee](#), the ARA is supportive of the proposed changes to the methodology for measuring Scope 2 emissions, which we understand will be reflected in amendments to the Measurement Determination and NGER regulations.

We also understand the proposed changes to the methodology will enable more timely and accurate collection of information about electricity consumption, which will be broadly welcomed by our members with a reporting obligation under the NGER scheme.

Thank you again for the opportunity to comment on these proposed updates to the NGER scheme. Any queries in relation to this submission can be directed to our policy team at policy@retail.org.au.

Yours sincerely,



Paul Zahra
Chief Executive Officer