

10 November 2025

Rami Greiss  
Executive General Manager  
Consumer and Fair Trading Division  
ACCC  
23 Marcus Clarke St  
CANBERRA ACT 2601

Via email: [rami.greiss@accc.gov.au](mailto:rami.greiss@accc.gov.au);

Dear Rami,

**RE: ACCC Complaint about potential misleading claims by Aetium**

1. We act for Climate Integrity. Climate Integrity is a not-for-profit advocacy group whose purpose is to close the corporate climate integrity gap in Australia by advocating for science, transparency, accountability and justice in the transition to zero emissions.
2. Our client requests that the Australian Competition and Consumer Commission (**ACCC**) investigate potentially misleading statements made by **Aetium** on its website ([www.aetium.com.au](http://www.aetium.com.au)) and in its advertising regarding the environmental benefit of its service and the legitimacy of its 'credit' scheme (together, the **Representations**). A summary of the potentially misleading claims found on the Aetium website and in their advertisements are set out in **Annexure A** and summarised in the table below.
3. The statements, alone and in combination, represent that:
  - (i) Aetium's 'Tonne CO<sub>2</sub> Units' (TCUs) represent genuine, additional CO<sub>2</sub> emissions reductions or removal (**emissions reduction representations**);
  - (ii) Participating in the purchase and sale of Aetium TCUs has a beneficial climate impact (**credits have climate impact representation**).

	Claim	Why it is potentially misleading
1.	Aetium's TCUs represent genuine, additional CO <sub>2</sub> emissions reductions or removal ("emissions reduction representations")	Claims that projects registered with Aetium are 'additional', 'permanent', and 'real', are inconsistent with the definitions accepted by most carbon credit schemes and climate scientists. Thus, the claim that Aetium TCUs represent genuine additional CO <sub>2</sub> emissions reductions is likely to mislead or deceive a target consumer.



2.	Participating in the purchase and sale of Aetium TCUs has a beneficial climate impact (“credits have climate impact representation”)	Both generators and purchasers of Aetium TCUs are induced to believe that they are contributing to activities with a beneficial climate impact. Both parties to this transaction are being misled. Generators are paid to reduce their emissions however it is unclear whether their activities constitute genuine climate impact as these activities presumably would be undertaken regardless of Aetium benefits. Similarly, buyers are assured that they are supporting verifiable and additional carbon projects, and that the purchase of TCUs acts as an offset for any emissions activity (scope 1, 2 or 3) that they undertake, thus enabling continued high-emissions activity. The claim that these TCUs ‘have a climate impact’ is misleading because they don’t meet the standards of additionality to be referred to as genuine credits.
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4. The statements that form the basis of the Representations, found in **Annexure A**, are potentially in breach of ss 18, 29(1)(b) and (g), 34 of the Australian Consumer Law (**ACL**) (Schedule 2 of the *Competition and Consumer Act 2010* (Cth)).

### Background to Aetium

5. **Aetium** is a digital service which enables individuals (**generators**) to register their solar, electric vehicle (**EV**) and forestry projects and receive credits for their purported emissions abatement. The Aetium abatement calculation methodology involves taking the CO<sub>2</sub> footprint of registered projects (solar, EV, or forestry) and comparing this with the hypothetical emissions from CO<sub>2</sub> intensive alternatives (grid energy, internal combustion engines, and logging). Aetium’s business model involves packaging these ‘reductions’ as tradeable Tonne CO<sub>2</sub> Units (**TCUs**) and facilitating the sale of these TCUs as carbon offsets on the “Aetium Exchange”. Aetium does not purport to calculate its methodology in accordance with any established carbon credit methodologies, i.e. international credit schemes or Australian Carbon Credit Unit methodologies.
6. Aetium makes numerous representations on its website and in its advertising which present TCUs as both environmentally beneficial (in their use as offsets) and socially beneficial (providing financial incentive and support to generators). Our client submits that the making of these representations encourages and promotes the use of credits



which not only may have adverse climate impacts but also potentially misleads the consumer.

### **Relevant provisions of the Australian Consumer Law**

7. Our client believes that the representations may breach s18, 29(1)(b) and (g) and 34 of the ACL.

Section 18 provides for misleading or deceptive conduct:

*(1) A person must not, in trade or commerce, engage in conduct that is misleading or deceptive or is likely to mislead or deceive.*

Section 29(1) provides for the false or misleading promotion of goods and services

*A person must not, in trade or commerce, in connection with the supply or possible supply of goods or services or in connection with the promotion by any means of the supply or use of goods or services:*

- b. make a false or misleading representation that services are of a particular standard, quality, value or grade; or*
- g. make a false or misleading representation that goods or services have sponsorship, approval, performance characteristics, accessories, uses or benefits;*

Section 34 prohibits misleading conduct in relation to the nature of services

*(1) A person must not, in trade or commerce, engage in conduct that is liable to mislead the public as to the nature, the characteristics, the suitability for their purpose or the quantity of any services.*

8. The representations are made by Aetium in advertisements and on the Aetium website as outlined in Annexure A. Aetium is an Australian business and engages in a trading relationship with consumers in its activities as facilitator of the sale of TCUs. Therefore, these representations are made in trade or commerce.

### **Representation 1 (*Emissions reductions representations*)**

9. Representation 1 presents a misleading characterisation of the emissions impact of Aetium registered projects, which include:
- (i) Use of solar panels;
  - (ii) Use of an electric vehicle; or



(iii) Ownership and preservation of forested land (more than 50 trees).

10. Aetium consistently describes its credits as representing genuine CO<sub>2</sub> reductions, capable of cancelling out the emissions activity of a prospective buyer. They claim that their carbon credits “are developed and reviewed using scientifically accepted principles and rigorous testing standards” and based on “PAVER Checklist”, which they define as:

“The PAVER Checklist is a regulatory framework that assists in validating carbon credits or CO<sub>2</sub> units. The PAVER principles ensure that carbon credits meet the highest standards of rigour.

PAVER has the following meaning:

- **Permanent:** ensures that the carbon credit removal or reduction is guaranteed for a certain period of time
- **Additionality:** the CO<sub>2</sub> removal or reduction would not happen without the project
- **Verifiable:** the carbon credit can be independently verified through publicly available documentation or systems
- **Enforceable:** the carbon credit has established ownership with usage rules that stop double-counting
- **Real:** The project actually removes or reduces the CO<sub>2</sub> claimed”

11. The calculation of the climate impact of TCUs via a comparison between the actual emissions of Aetium-registered products, and the hypothetical emissions of CO<sub>2</sub> intensive alternatives is flawed for the reasons set out below. These statements constitute potentially misleading conduct on the basis that Aetium is misconstruing and/or violating three of the five integrity principles that they claim to follow – Additionality, Permanent, and Real. The implication that these offsets “cancel out your CO<sub>2</sub> footprint” is likely to mislead the target consumer. This statement also possibly breaches section 2 and 3 of the Code. CO<sub>2</sub> footprint is only meaningfully changed when it adopts new practices which contribute to the reduction of its emissions. Without such behavioural changes, the emissions from their activities will continue to accumulate in the atmosphere and cannot simply be “cancelled out” by offsetting through the purchase of avoidance credits.

**Additionality:**

12. Additionality in carbon projects refers to the removal of CO<sub>2</sub> from the atmosphere beyond ‘business as usual’ practices. A project, and the carbon credits it generates, can only be



classified as additional **if the CO<sub>2</sub> removal would not have occurred in the absence of the crediting mechanism and the financial incentive it provides**

13. This definition, which is widely adopted across most carbon crediting regimes, works to ensure carbon credits are only issued to activities that achieve additional abatement, beyond activities that would have occurred in the course of ordinary business or for existing activities.
14. All prominent international carbon crediting standards reject methodologies similar to those adopted by Aetium based on the additionality criteria. For example, the following international credits provide in their policies:
  - (i) **Gold Standard:** "would not have been realized without financial support ... additional to what would have happened"
  - (ii) **Verra:** "Additionality means that the reduction or removal of a greenhouse gas (GHG) emission arises from an activity that would not have occurred without the revenue from the sale of carbon credits."
  - (iii) **ACCU:** "Only new projects are eligible. Projects that are already underway or include business-as-usual activities won't be registered under the ACCU Scheme."
  - (iv) **The Integrity Council for the Voluntary Carbon Market:** "the greenhouse gas (GHG) emission reductions or removals from the mitigation activity shall be additional, i.e., they would not have occurred in the absence of the incentive created by carbon credit revenues."
15. In the case of Aetium, carbon credits are being registered retrospectively, ie., after the carbon reduction activity has already taken place and without consideration of the financial incentive that may be provided by the Aetium scheme, so do not meet the well-established international standard of additionality, and so may not represent real reductions in greenhouse gas emissions.

### **Permanent**

16. While there is no absolute consensus on what constitutes an acceptable level of permanence, 100 years has been a common reference period since the Kyoto Protocol. At the same time, many experts have begun arguing that permanence needs to be considerably longer, with a 2024 modelling study finding that a storage duration of under



1,000 years “still leads to continuous warming” and thus is insufficient to meet temperature targets like those in the Paris Agreement.<sup>1</sup>

17. Under Australian ACCUs, sequestration projects can choose a permanence period of 100 years for full credits, or 25 years for partial credits. For Verra, projects must comply with at least 40-year project longevity / monitoring / compensation requirements. Aetium defines ‘permanent’ as: “ensure[ing] that the carbon credit removal or reduction is guaranteed” ... “over 12-month periods”.
18. Aetium’s definition therefore represents a significant departure from recognised permanence standards - treating a 12-month guarantee as “permanent” risks misleading buyers, since no credible framework considers storage on such a short timescale to constitute enduring carbon removal or reduction.

### **Real**

19. As acknowledged in the settlement in the Parents for Climate v Energy Australia case,<sup>2</sup> avoidance credits, like those being offered by Aetium, do not represent the physical removal of carbon from the atmosphere. Rather, estimating their effect involves comparing them to a hypothetical ‘business as usual’ scenario where the offsetting intervention did not take place. Ultimately, the companies purchasing the credits are granted a social license to continue to emit greenhouse gases through their operations, and these emissions continue to accumulate in the atmosphere.
20. Despite representations on the Aetium website, TCUs do not genuinely represent CO<sub>2</sub> avoidance or reduction and should not be represented to provide credits. As explained by The Smith School of Enterprise and Environment at Oxford University:

*Carbon offsetting schemes are frequently used to help organisations achieve net zero carbon emissions. However, current approaches are unlikely to deliver the level of emissions reduction needed to achieve global climate goals.*

*Well thought-out carbon offsetting can contribute to net zero strategies, particularly in hard-to-decarbonise sectors. However, if not done well, offsetting can result in ‘greenwashing’ and create unintended negative impacts for both people and the*

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<sup>1</sup> <https://www.nature.com/articles/s43247-024-01808-7>

<sup>2</sup> [Go Neutral Litigation – EnergyAustralia acknowledges issues with “offsetting” and moves away from carbon offsets for its residential customer products | EnergyAustralia](#)



*environment.*<sup>3</sup>

21. Aetium presents its TCUs as a legitimate abatement strategy which can be applied to Scope 1, 2 and 3 emissions in a company's ESG reports. This highlights an underlying issue with the way that offsets are regulated. The level of regulation and rigour associated with creating a valid ACCU far exceeds the practices undertaken by Aetium and raises the question of the validity of making TCUs available on a voluntary market with no established and recognised methodology behind their product.

### **Representation 2 (*Climate impact representation*)**

22. Representation 2 is misleading as it relies on the principle that a generator, by virtue of registering a project with Aetium, is actively contributing to activities with a beneficial climate impact. Almost all projects registered with Aetium represent pre-existing decisions by generators, and it is unclear whether climate impacts are a factor in the decision to invest in a solar panel or EV for example. Therefore, there is no clear evidence on which Aetium can base their claims that TCUs equate to an active contribution to emissions abatement efforts.
23. The representation that Aetium rewards generators for making a genuine climate impact ignores the key consequence of registering a product with Aetium. Contrary to Aetium representations, the definition of additionality requires a generator to be provided with an incentive to reduce their emissions and not rewarded for actions they've already taken. Furthermore, in many cases generators have already engaged in the purchase of solar panels or an EV for a mix of environmental and financial reasons and do not require the added incentive of TCU revenue. Similarly, representations that buyers are supporting genuine climate action enables a company to rely on offsets as a carbon abatement strategy instead of seeking genuine emissions reductions (e.g., through changes to their operating procedures). The credits provided by Aetium in fact allow purchasers to avoid further action and continue to emit greenhouse gases into the atmosphere, which will have a significant impact on the climate. For this reason, many scientists argue that carbon offsets are inconsistent with the Paris agreement temperature goals and may frustrate temperature stabilisation efforts.<sup>4</sup> This is because the carbon offsets rarely achieve the climate benefits claimed. Very few lead to long duration carbon removals,

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<sup>3</sup> [The Oxford Offsetting Principles | Smith School of Enterprise and the Environment](#)

<sup>4</sup> Danny Cullenward, Grayson Badgley and Freya Chay, 'Carbon Offsets are incompatible with the Paris Agreement' One Earth, v6, issue 9 <[Carbon offsets are incompatible with the Paris Agreement: One Earth](#)>



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instead they are used to justify ongoing emissions rather than reduce them. There are also concerns that many voluntary offset claims are double counted.<sup>5</sup>

24. In the recent article, “Are Carbon offsets fixable” the authors found: “Offset quality and integrity matter because bad credits are taking the place of real emissions reductions and are used to justify continued emissions by consumers and producers. This is a classic moral hazard that undermines ambition, distorts measurements of emissions reductions, and slows progress to meet urgent decarbonization targets. Moreover, finance directed toward purchasing bad credits conceivably displaces investment in direct decarbonization or other high-integrity approaches.”<sup>6</sup>
25. Many offsets in the voluntary carbon market lead to ‘over crediting’ – which poses a critical threat to the global effort to manage GHG emissions. Significant emphasis must be placed on carbon dioxide removal and storage methodologies to ensure high integrity and durability of credit schemes.<sup>7</sup> Low integrity schemes, such as the Aetium programme, risk the continuation of widespread reliance on offsetting, significantly delaying genuine emissions reduction efforts and culminating in the continued growth of overall greenhouse gas emissions.<sup>8</sup>

Yours faithfully

**Environmental Defenders Office**

**Kirsty Ruddock**

Managing Lawyer

Corporate and Commercial

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<sup>5</sup> Danny Cullenward, Grayson Badgley and Freya Chay, ‘Carbon Offsets are incompatible with the Paris Agreement’ One Earth, v6, issue 9 <[Carbon offsets are incompatible with the Paris Agreement: One Earth](https://www.oneearth.org/articles/2023/06/01/carbon-offsets-are-incompatible-with-the-paris-agreement)>


<sup>6</sup> Joseph Romm, Stephen Lezak, and Amna Alshamsi, ‘Are Carbon Offsets Fixable?’, *Annual Reviews* <<https://www.annualreviews.org/content/journals/10.1146/annurev-environ-112823-064813>>.

<sup>7</sup> Joseph Romm, Stephen Lezak, and Amna Alshamsi, ‘Are Carbon Offsets Fixable?’, *Annual Reviews* <<https://www.annualreviews.org/content/journals/10.1146/annurev-environ-112823-064813>>.

<sup>8</sup> University of Oxford Smith School of Enterprise and the Environment, ‘The State of Carbon Dioxide Removal - A global independent scientific assessment of Carbon Dioxide Removal’ (Report, 2nd edition 2024) <https://static1.squarespace.com/static/633458017a1ae214f3772c76/t/665ed1e2b9d34b2bf8e17c63/1717490167773/The-State-of-Carbon-Dioxide-Removal-2Edition.pdf>



## Annexure A: Aetium Website and Facebook Representations



**Welcome to Aetium**

Get paid \$ for reducing CO2

**START HERE**  
Calculate CO2 reduction

**Buy CO2 Offsets**

SMART ENERGY COUNCIL

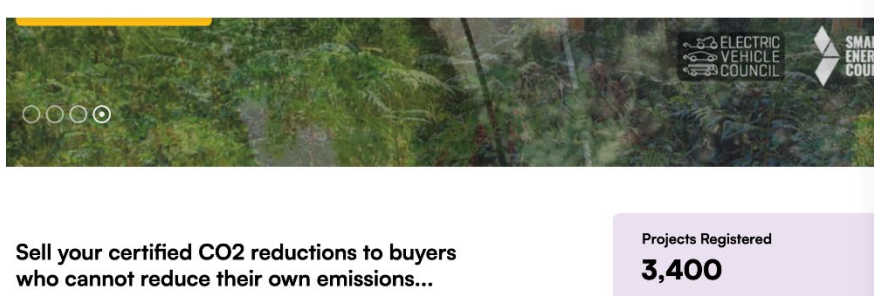
Australian Carbon Industry Code of Conduct

Sell your certified CO2 reductions to buyers who cannot reduce their own emissions...

Projects Registered **2,392**

CO2 Registered **21,502** tonnes

**Aetium™** About How Aetium Works Project Types Project Register FAQ Contact

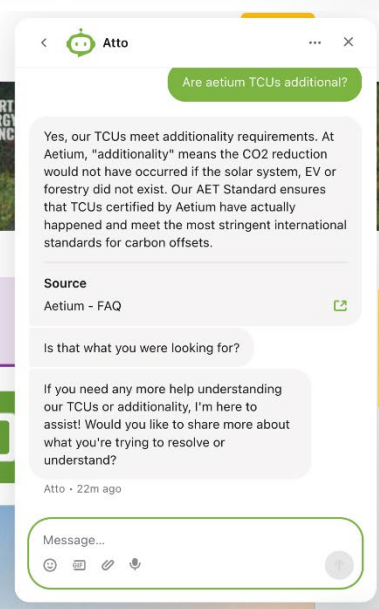


Sell your certified CO2 reductions to buyers who cannot reduce their own emissions...

Projects Registered **3,400**

Ask our AI Assistant → Your question here... Submit

**LEARN MORE**  
Solar CO2 reduction



< Atto ... X

Are aetium TCUs additional?

Yes, our TCUs meet additionality requirements. At Aetium, "additionality" means the CO2 reduction would not have occurred if the solar system, EV or forestry did not exist. Our AET Standard ensures that TCUs certified by Aetium have actually happened and meet the most stringent international standards for carbon offsets.

Source  
Aetium - FAQ

Is that what you were looking for?

If you need any more help understanding our TCUs or additionality, I'm here to assist! Would you like to share more about what you're trying to resolve or understand?

Atto • 22m ago

Message...



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## About Aetium

### Our Mission

- ✓ Empower people who reduce CO2 emissions
- ✓ Provide the most secure and trustworthy offsets available
- ✓ Revolutionise the way Australians combat climate change

Projects Registered

**2,392**

CO2 Registered

**21,502** tonnes

### What is Aetium?

Aetium is a digital service that calculates and certifies CO2 reductions. We make it simple to register projects that reduce net CO2 emissions like [Solar panels](#), [Electric vehicles](#), [Forests and trees](#). Via our digital platform, we empower individuals and organisations to be recognised for their climate actions. Verified CO2 reductions are converted into Aetium TCUs (Tonne CO2 Units). TCUs are an accurate and credible digital instrument that can be traded or retired, offering a tangible way to recognise and reward CO2 reductions.

### Taking Action

**Aetium™**

[About](#)

[How Aetium Works](#)

[Climate Change](#)

[FAQ](#)

[Project Register](#)

[Contact](#)

[Sign in](#)

[Join](#)

### Australian Company

Established in Melbourne, Australia, Aetium's mission is to support people who are lowering CO2 emissions. We recognise the cost and effort made by people who install solar systems, drive electric vehicles, and those who actively protect and rehabilitate forests. Reducing CO2 emissions represents arguably our greatest global challenge. Instead of telling people what NOT to do, we focus on the actions that can be taken to improve the situation. Using the power of technology, we securely track and verify CO2 reductions. Our regulatory process is transparent, inexpensive and available to everyone.

### Our Commitment

We are an independent and impartial organisation that documents and certifies CO2 reductions. Our objective is to be trusted in all circumstances to tell the truth, to protect the environment, to call the numbers as they really are, and to be conservative with the facts. Every Aetium TCU is bound to proven principles, robust data and a digital framework that ensures our TCUs deliver the CO2 reductions committed.



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## Take Climate Action with Aetium CO2 Offsets



### Every Australian emits 18.6 tonnes of CO2.

It's time to take action on CO2 emissions - not through vague pledges, international offsets, or government waiting games. Directly supporting real, measurable CO2 reductions in Australia.

### What is a CO2 Offset?

A CO2 offset (or carbon offset) is a measurable reduction or removal of carbon dioxide (CO2) from the atmosphere, used to compensate for emissions made elsewhere. When you buy a CO2 offset, you are supporting a project that actively avoids or removes CO2.

### The Aetium Difference

Aetium is the first community-led CO2 reduction platform globally: a fully transparent, independently certified, blockchain-powered carbon offset marketplace. Whether you're an individual, a business, or a community group, Aetium enables you to support Australian CO2 reductions.

### Why Choose Aetium?

- **Verified Offsets:** Each tonne of CO2 is measured and certified by Aetium.
- **Immutable Registry:** All offsets are recorded on blockchain to ensure transparency, prevent double counting, and protect the integrity of your climate contribution.
- **Pre-purchase, Pay Later:** Lock in the price, mirror your CO2 emissions over the next 12-months and only pay once certification is complete.
- **Offset your CO2:** There are some CO2 emissions you can't avoid... with Aetium you are supporting CO2 reductions that cancel out your CO2 footprint.

### How It Works

1. Choose how many tonnes of CO2 you want to offset.
2. Choose from three offset categories:
  - **Premium:** Fully monitored solar + battery, or EVs powered with green energy.
  - **Standard:** Verified solar, EVs or reforestation in unprotected areas.
  - **Basic:** Older solar installations or protected-zone forestry.
3. You'll be billed in 12 months, when the certification is complete.
4. Choose how your name, logo, or alias is shown on the Aetium registry (You can go public or stay anonymous).
5. Once your offsets are paid for, it's permanently retired and recorded on the [Aetium Registry](#) - your climate action, documented forever.
6. **Offset 100% of your CO2 emissions for as little as AUD \$279 per year\*.**

### Aetium Is Built on Trust

Every Aetium CO2 Offset is backed by conservative and auditable data. Whether you're offsetting your own emissions or supporting CO2 reductions for future generations, Aetium helps you take action. This isn't just about numbers on a page. It's about action you can see, measure and be proud of.



### What is the PAVER Checklist?



The PAVER Checklist is a regulatory framework that assists in validating carbon credits or CO2 units. The PAVER principles ensure that carbon credits meet the highest standards of rigour.

PAVER has the following meaning:

- **Permanent:** ensures that the carbon credit removal or reduction is guaranteed for a certain period of time
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- **Enforceable:** the carbon credit has established ownership with usage rules that stop double-counting
- **Real:** The project actually removes or reduces the CO2 claimed



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Aetium

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We're excited to introduce Aetium! Track your solar impact, earn cashback, and join us in building a brighter, greener future.

make  
Aetium  
count



aetium.com.au

**Make Your Solar Power Count  
with Aetium**

Sign up

👍 4

1 comment 3.7K views



Like



Comment



Share





## Calculating CO2



- Established scientific calculation models
- Machine learning and artificial intelligence
- Third-party data validation and digital images
- Blockchain and digital certificates
- Decentralised public registry
- Internal and external review processes

## Certification and Auditing

In January 2025, Aetium became an endorsed member of the [Smart Energy Council](#) (SEC), which is an independent industry body representing storage, electric vehicle, and renewable hydrogen sectors.

In March 2025, Aetium was accepted as a signatory of the [Australian Carbon Industry Code of Conduct](#) (ACI) which is committed to developing built on community trust, transparency, accountability, social and environmental integrity, in compliance with the law.

In April 2025, Aetium became a corporate member of the [Carbon Market Institute](#) (CMI) to actively contribute to the development of a credible, market in Australia. As a company committed to driving the transition to a low-emissions economy, Aetium recognises the importance of staying at market trends and climate solutions. Membership in the Institute enables us to collaborate with industry leaders, access expert insights and influence Australia's carbon market. This aligns with Aetium's mission to support practical, high-integrity climate action and ensure our projects and innovative environmental impact.

In August 2025, Aetium became an endorsed member of the [Electric Vehicle Council](#) (EVC), which is Australia's national body representing the EV infrastructure and market growth to accelerate the transition to electric transport.

Aetium is currently undergoing multiple certification programs with government, industry associations and international certification programs. The science that underpins our modelling is undisputed. Additional certifications are expected to be added in the coming months.

Aetium's financial accounts are audited by [KPMG](#).

## Time for Action

A study across 17 advanced economies showed that 72% of people believed that climate change will harm them personally at some point in their lifetime (PEW Research Centre). And more than 80% of people were willing to make changes in how they work and live to reduce the effects of rapid climate change.

International consensus to achieve Net Zero emissions by 2050 [which would limit global temperature increases to 1.5°C above pre-industrialised levels] has been agreed by most of the world's governments; however, current indications are that Global Net Zero by 2050 will not be achieved.

Despite the best efforts of many individuals, business and governments; delivering the step-change required to achieve Net Zero is often undermined by misinformation, politicisation, regionalisation and shorter-term business and national interests. **A shift in the way we value and adopt CO2 reductions is required.**

Learn about Aetium Solar

Learn about Aetium EV

Learn about Aetium Forestry

