



Environmental  
Defenders Office

**Submission to the Senate Select Committee on  
Information Integrity on Climate Change and Energy**

**12 September 2025**

## **About EDO**

EDO is a community legal centre specialising in public interest environmental law. We help people who want to protect the environment through law. Our reputation is built on:

**Successful environmental outcomes using the law.** With over 40 years' experience in environmental law, EDO has a proven track record in achieving positive environmental outcomes for the community.

**Broad environmental expertise.** EDO is the acknowledged expert when it comes to the law and how it applies to the environment. We help the community to solve environmental issues by providing legal and scientific advice, community legal education and proposals for better laws.

**Independent and accessible services.** As a non-government and not-for-profit legal centre, our services are provided without fear or favour. Anyone can contact us to get free initial legal advice about an environmental problem, with many of our services targeted at rural and regional communities.

**[www.edo.org.au](http://www.edo.org.au)**

### **Submitted to:**

Select Committee on Information Integrity on Climate Change and Energy  
Department of the Senate  
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## **Acknowledgement of Country**

The EDO recognises and pays respect to the First Nations peoples of the lands, seas and rivers of Australia. We pay our respects to the First Nations Elders past, present and emerging, and aspire to learn from traditional knowledges and customs that exist from and within First Laws so that together, we can protect our environment and First Nations cultural heritage through both First and Western laws. We recognise that First Nations Countries were never ceded and express our remorse for the injustices and inequities that have been and continue to be endured by the First Nations of Australia and the Torres Strait Islands since the beginning of colonisation.

EDO recognises self-determination as a person's right to freely determine their own political status and freely pursue their economic, social and cultural development. EDO respects all First Nations' right to be self-determined, which extends to recognising the many different First Nations within Australia and the Torres Strait Islands, as well as the multitude of languages, cultures, protocols and First Laws.

First Laws are the laws that existed prior to colonisation and continue to exist today within all First Nations. It refers to the learning and transmission of customs, traditions, kinship and heritage. First Laws are a way of living and interacting with Country that balances human needs and environmental needs to ensure the environment and ecosystems that nurture, support, and sustain human life are also nurtured, supported, and sustained. Country is sacred and spiritual, with culture, First Laws, spirituality, social obligations and kinship all stemming from relationships to and with the land.

## Executive Summary

Environmental Defenders Office (**EDO**) welcomes the opportunity to comment on the Select Committee on Information Integrity on Climate Change and Energy.

As part of a national community legal centre specialising in public interest environmental law, the work of the EDO Corporate and Commercial lawyers includes examining potential greenwashing and related conduct. As a legal organisation, we have focused in this submission on our experience in observing misinformation around climate change issues, and regulatory approaches that could be taken to combating misinformation and disinformation. We have also incorporated our experience in the environmental assessment and decision-making process, through which changes could be made to help reduce misinformation and create more accurate transparency around the impacts projects may have in exacerbating climate change.

### Summary of Recommendations

- 1. That the Commonwealth Government enact national fossil fuel advertising bans to ensure there is less ability to spread misinformation.**
- 2. Political advertising should be the subject to similar provisions as contained in the Australian Consumer Law for misleading or deceptive conduct.**
- 3. That environmental laws be amended to require proponents to provide independently verified, transparent, and scientifically robust information on the climate impacts of their projects in application materials and for ongoing reporting.**
- 4. That adequate resources must be allocated to assessment agencies to enable rigorous review and enforcement of these requirements.**

## Introduction

In her report to the UN General assembly<sup>1</sup>, special rapporteur Elisa Morgera summarises the impacts of climate/energy misinformation and disinformation:

*‘Overall, the fossil fuel playbook has negatively impacted the rights to information, education and science, undermining the exercise of civil and political rights and preventing effective human rights protection, for at least six decades.’*

As a result, the special rapporteur on the promotion and protection of human rights in the context of climate change, Elisa Morgera, recommended that states and companies take action to stop fossil fuel advertising. According to the special rapporteur:

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<sup>1</sup> [g2507022.pdf](#)

*'[C]limate misinformation practices through advertising have become a profit-making activity thanks to a revenue-sharing model with big tech (spreading misinformation on social media platforms by means of advertisements, including advertisements generated by artificial intelligence). In addition, fossil fuels advertisements have for decades shaped public perceptions by downplaying human rights impacts and emphasizing the role of fossil fuel products in economic growth and modern life. Bans on fossil fuel advertising can serve to challenge the taken-for-granted presence of fossil fuel products in our lives, as well as underlying patterns of systemic inequalities, overproduction and overconsumption.'*

She recommended that states should:

- (d) Ban fossil fuel advertisements, promotion and sponsorship, including cross-border advertising;
- (i) Criminalize media and advertising firms for amplifying disinformation and misinformation by fossil fuel companies;

And further that advertising and big-tech companies should:

- (a) Refuse fossil fuel-related promotion and sponsorships;
- (b) Support public awareness about the health and other benefits of fossil fuel-free lifestyles;
- (c) Disclose publicly any funding from the fossil fuel industry, and the objectives and periods of engagement; and
- (d) Collaborate with and support independent media that provide accurate climate information.

Additionally, in a [joint statement of April 10th, 2025](#), special rapporteurs Elisa Morgera and Astrid Puentes Riaño called for fossil fuel advertising bans to protect human rights to life, health, a healthy environment and information. In this statement, the special rapporteurs concluded that:

*'This is such an important lesson from the recent past: had States more effectively controlled tobacco advertising earlier, millions of lives could have been saved. Let's avoid making the same mistake.'*

The same message has been reinforced by the United Nations Secretary-General, António Guterres, has also called for states to implement bans on fossil fuel advertising during a [special address on climate change](#):

*'Many in the fossil fuel industry have shamelessly greenwashed, even as they have sought to delay climate action – with lobbying, legal threats, and massive ad campaigns. They have been aided and abetted by advertising and PR companies...I call on these companies to stop acting as enablers to planetary destruction. Stop taking on new fossil fuel clients, from today, and set out plans to drop your existing ones. Fossil fuels are not only poisoning our planet – they're toxic for your brand. Your sector is full of creative minds who are already*

*mobilising around this cause. They are gravitating towards companies that are fighting for our planet – not trashing it.*

*I also call on countries to act. Many governments restrict or prohibit advertising for products that harm human health – like tobacco. Some are now doing the same with fossil fuels. I urge every country to ban advertising from fossil fuel companies. And I urge news media and tech companies to stop taking fossil fuel advertising.’*

### **Prevalence of misleading information in advertising in relation to climate change:**

Since the commencement of the EDO Corporate Accountability Program in late 2020, the EDO has assisted many clients with advice and complaints to regulators about misleading statements around climate change and energy. See **Appendix A** for examples and links to many of those complaints. Unfortunately, only a few complaints have resulted in enforcement action or banning of the advertisement, or when enforcement action occurs, it can take considerable time. For example, while we welcome the ACCC action against Australian Gas Networks claims of ‘renewable gas’, the civil enforcement proceedings occurred almost three years after our clients first complaint. If action doesn’t occur quickly, the misinformation is allowed to continue and has greater impact on consumer behaviour and impact on competitors who may not be making misleading claims.

In the past year, there has been a significant expansion of the complaints around what appears to be coordinated misinformation by various fossil fuel companies and their peak bodies as to the inability of renewables to provide reliable energy. For example, while Australian Energy Producers (**AEP**)’s campaign to ‘keep the country running’ promoting natural gas as a low-cost and critical transition fuel that supports renewables, several AEP members produced similar messaging. See **Appendix B** for details.

More recently, we have dealt with examples of alleged astro-turfing and made a complaint to the ACCC on behalf of Climate Integrity in relation to Australians For Natural Gas, who was established by the CEO of Tamboran, Joel Riddle while claiming to be a grassroots group supporting gas.<sup>2</sup>

#### *Political advertising*

We have also had many complaints about misinformation in relation to political advertising that is not regulated by current laws. For example, as this advertisement was made by a community group but as it contained political advertising it did not fall within any of the categories of advertisements that are subject to regulation by the ACCC, ASIC or Ad Standards (a voluntary Industry Code). Furthermore, the EDO has seen a rise in opposition to renewable energy projects, that appear to be often based on a lack of understanding of the benefits of renewable energy. A good example, is the Maules Creek Solar Farm that is near the Maules Creek mine, but faces

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<sup>2</sup> See [FINAL complaint to ACCC re AFNG.pdf](#).

significant community opposition<sup>3</sup>, as has the community battery in Narrabri which was delayed due to concerns about fire risks.<sup>4</sup>



### Powers of the Commonwealth to regulate fossil fuels and other political advertising

The Commonwealth Government has the power to regulate broadcasting and communication under s51(v) of the Australian Constitution, in addition to powers to regulate trade or commerce (s51(i)) and foreign or trading corporations (s51(xx)). This gives it broad powers to deal with advertising and online misinformation including around fossil fuels and energy.

In 1989, the Australian Government introduced the *Tobacco Products Advertisements (Prohibition) Act 1989* (Cth), which prohibited advertising of tobacco products in all newspapers and magazines, effective from December 1990 relying on these powers. This has been updated recently to include all direct or indirect promotion of smoking or vaping in the *Public Health (Tobacco and other Products) Act 2023* (Cth).

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<sup>3</sup> [Location - Maules Creek Solar Farm](#) , [Second Community Consultative Committee \(CCC\) Meeting hosted by FRV to foster local engagement for Maules Creek Solar Farm - Maules Creek Solar Farm](#)

<sup>4</sup> [Narrabri Battery Project Short-Circuited By Council U-Turn](#)

Similarly, there have been private members bills seeking to extend voter protections against misleading advertising, namely the *Commonwealth Electoral Amendment (Voter Protections in Political Advertising) Bill 2023* (Cth).

### Examples in Australia of fossil fuel regulation

The ACT was one of the first jurisdictions in the world to ban fossil fuel advertising on light rail vehicles. This policy can be found on [Transport Canberra’s website](#).

Products and messages must be suitable and appropriate for the broader population and in line with the values of the Canberra community and ACT Government objectives. Ads must be legal, meet Australian Standards, and not represent, portray or promote fossil fuels.

Recently, the ACT’s Legislative Assembly passed a [motion to ban fossil fuel sponsorships in schools](#) from 2026. The Motion from Laura Nuttall MLA called on the ACT Government to:

- (a) by the beginning of the 2026 school year, update Education Directorate policy to prevent fossil fuel and gambling companies from public school sponsorships;
- (b) assist schools currently receiving money or sponsorship from any fossil fuel or gambling companies to transition to alternate funding as required; and
- (c) by the last sitting week of 2025, ensure the Education Directorate:
  - (i) identifies which policy changes have been implemented, and provide timelines for policy changes which have not yet taken place; and
  - (ii) articulates all assistance provided to schools which have transitioned away from fossil fuel or gambling company funding.

Many other Australian municipalities have also banned fossil fuel advertising to various degrees, including:

Blue Mountains Council	<a href="#">Voted to ban fossil fuel ads and sponsorships</a>
Byron Bay Council	<a href="#">Prohibits fossil fuel sponsors</a>
Charles Sturt Council	<a href="#">Agreed to not promote fossil fuel companies</a>
Darebin Council	<a href="#">Voted to prohibit fossil fuel advertising and sponsorships</a>
Fremantle Council	<a href="#">Restricted fossil fuel advertising and sponsorships</a>
Glen Eira Council	<a href="#">Banned fossil fuel sponsorships and partnerships</a>
Inner West Council	<a href="#">Voted to restrict fossil fuel ads and sponsorships</a>
Lane Cove	<a href="#">Voted to investigate banning fossil fuel ads and sponsorships</a>

Maribyrnong Council	<a href="#">Banned fossil fuel signs on council land</a>
Merri-bek Council	<a href="#">Implemented a ban on fossil fuel advertising on council land</a>
Mitcham Council	<a href="#">Voted to ban fossil fuel ads and sponsorships</a>
Mosman Council	<a href="#">Voted to explore restrictions on fossil fuel ads and sponsorships</a>
Ryde Council	<a href="#">Voted to end fossil fuel ads and sponsorships</a>
City of Sydney	<a href="#">Voted to prevent fossil fuel ads on Council property. Implemented ban on fossil fuel partnerships.</a>
Waratah Wynyard Council	<a href="#">Stopped fossil fuel advertising on council property</a>
Wingecarribee Council	<a href="#">Prevents partnerships with fossil fuel companies</a>
Yarra Council	<a href="#">Prevents fossil fuel ads and sponsorships on council land</a>

### Approach overseas in regulating fossil fuel advertising and misinformation

Many commentators and jurisdictions have found that banning fossil fuel advertisements is cheaper and quicker than, more costly climate actions, such as retrofitting homes and building infrastructure. For example, in the UK, Andrew Simms, author of UK's Badvertising group said:

Politically, banning the adverts doesn't prevent people flying, driving or taking resource-intensive, luxury cruises...But, like with the tobacco ban, it stops their promotion so that fewer people will take those options.”<sup>5</sup>

#### France

In 2021, France became the first European country to enact a nationwide ban on fossil fuel ads. However, this ban only covers ads for fuels like petrol and diesel. According to [Àlex Peralta Martínez](#) from the Human Rights Research Centre:

[T]his law has its limitations. The EU still defines natural gas as green energy; therefore, natural gas advertisements are still permitted, which exempts gas-powered cars and planes from the national ban. Finally, fossil fuel companies still can visualize themselves through sponsorship of events, institutional communication and financial advertising.

Additionally, according to [World Without Fossil Ads](#), this ban still has not been implemented.

#### Netherlands

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<sup>5</sup> [This Scottish City Just Banned SUV And Airline Ads. Here's Why](#)

In January 2023, The Hague introduced a municipal ordinance banning advertisements for fossil fuels, fossil-powered transport, and the aviation sector in all public spaces, including bus stops, billboards, and other outdoor media platforms managed by the city.

Shortly after its introduction, the ordinance was legally challenged by travel companies which argued that the ban was too broad and restricted their commercial interests. However, in April 2025, the District Court of The Hague ruled that the city acted lawfully in introducing the ban. The court recognised the city's right — and responsibility — to protect public health and the environment, especially in the context of the climate crisis. A summary of the court's decision can be found [here](#).

Various other Dutch cities, including Amsterdam, Tilburg, Utrecht, and Eindhoven, have followed The Hague's example by initiating similar fossil fuel advertising bans.

### **United Kingdom**

According to [World Without Fossil Ads](#), there are growing number of local councils who have banned advertising by fossil fuel companies and other high carbon products in the UK including Cheshire West & Chester, [Edinburgh](#), [Sheffield](#), [Cambridgeshire](#), Hackney, [North Somerset](#), [Coventry](#), [Liverpool](#), and [Basingstoke & Deane](#).

### **Aotearoa/New Zealand**

In 2023, the Greater Wellington Transport Committee adopted the [Metlink Advertising Policy](#) which bans advertising of environmentally harmful products, including fossil fuel-powered vehicles, on public transport in the Greater Wellington Regional Council.

### **Sweden**

In March 2023, the wider Region of Stockholm announced that guidelines for advertising will be updated to meet sustainability criteria, with a specific focus on fossil fuel advertising. From January 2026, residents of the capital and other municipalities in the most populated region of Sweden will no longer have advertisements for fossil fuels and fossil-powered products, a ruling that covers the entire public transport system, including buses, subways, regional trains and ferries.

### **Belgium**

On March 27, the municipal council of Saint-Gilles adopted a motion calling for a ban on fossil fuel advertising in the Brussels Capital Region. According to [World Without Fossil Ads](#), bans are particularly important in Brussels, as the EU capital because:

“Ads from Total, Shell, and Exxon here are especially targeted at EU politicians. These are lobbying ads meant to mislead. In this era of misinformation, the ban is a vital step.”

## ***Proposed bans on fossil fuel advertising***

### **Spain**

In June 2025, the Spanish government voted in favour of a draft bill that will ban advertising of fossil fuels, short flights with more sustainable alternatives, and of vehicles powered exclusively by fossil fuels. According to [World Without Fossil Ads](#):

If implemented, the bill would outlaw the following within Spain:

- All ads for petrol, diesel or coal-based energy—and for vehicles or services powered exclusively by those fuels—will disappear from Spanish media and public spaces. However, products can be promoted that contain a non-fossil component such as a biofuel blend. The draft law sets no minimum for the percentage of "green" fuel that needs to be mixed in.
- Ads for domestic short-haul flights will also be barred when a train alternative adds less than 2 h 30 to the journey.
- To counteract out “greenwashing,” broad claims like “climate-friendly” or “100% eco-friendly” must be backed by recognised certification; offset-only carbon claims are outlawed.

### **Ireland**

There are two relevant bills before the Irish parliament.

Firstly, the [Prohibition of Fossil Fuel Advertising Bill 2024](#), which would ban advertising of fossil fuels and fossil fuelled vehicles, including commercial sponsorship, by corporate entities and to establish a Fossil Fuel Information Commission for the purposes of product and price comparisons by the public.

Secondly, the [Fossil Fuel Products \(Control of Advertising and Sponsorship\) Bill 2024](#), which has lapsed with the dissolution of the parliament. If this bill were restored, it would prohibit advertising of fossil fuels and fossil fuel undertakings and provide for certain exemptions; prohibit sponsorship by fossil fuel products and fossil fuel undertakings; empower the Commission for the Regulation of Utilities to investigate and enforce provisions; and provide for related matters.

### **Canada**

In Canada’s federal parliament, there is currently a bill ([Bill C-372](#)) proposed for a tobacco-style ban on fossil fuel advertising. According to MP Charlie Angus:

This legislation will target advertising that falsely claims that oil and gas are having a positive impact on the global economy and we recently learned that toxic contamination from Canada's oil and gas industry is 6,000 times higher than officially reported. This legislation will make it illegal for Canada's oil and gas giants to falsely identify themselves with the health and positive lifestyles

of Canadians or with reconciliation of Indigenous people on whose lands the toxic contamination is highest.

The legislation will make it illegal to falsely claim that the use of one fossil fuel product is somehow better than another fossil fuel product in improving the environment. To claim that there are clean fossil fuels is like saying there are safe cigarettes we know that is simply not true.

**Recommendations:**

- 1. That the Commonwealth Government enact national fossil fuel advertising bans to ensure there is less ability to spread misinformation.**
- 2. Political advertising should be the subject to similar provisions as contained in the Australian Consumer Law for misleading or deceptive conduct.**

**Improving the standard of applications and reporting requirements from proponents in environmental laws will assist in improving accuracy of information on climate impacts**

Currently, the laws at both federal and subnational levels do not require proponents to provide sufficiently detailed, high-quality, or scientifically rigorous information on climate and environmental impacts when lodging development applications. Too often, proponents provide self-commissioned reports which are not independently verified, and which may downplay or inadequately assess the project's likely climate risks and impacts. This has been well established through cases in which EDO has represented clients concerned about the quality and accuracy of environmental impact assessment put forward by fossil fuel companies in seeking environmental approvals.

A recent example occurred in a case before the Queensland Land Court in which EDO represented Environmental Advocacy of Central Queensland in their challenge to the approval of the Blue Energy and Eureka Petroleum gas project environmental authority. During this case our legal team discovered that the proponents' original application underestimated the amount of gas to be extracted by 18,800 per cent. The department had not required greenhouse gas emissions to be assessed in the original application and failed to detect the error and therefore failed to consider the subsequent greenhouse gas (**GHG**) emissions before it gave this project the green light. Through our client's appeal the department conceded that GHG assessment, including of the downstream GHG emissions once gas from the project is sold, is a relevant consideration for assessing gas projects under the *Environmental Protection Act 1994* (Qld). This is just one of many examples where significant inaccuracies have been discovered in environmental impact assessment material – the material relied upon by government's to allow projects to be developed.

This issue is compounded by the fact that many environment departments tasked with assessing applications are under-resourced and unable to conduct the detailed scrutiny needed to properly test or challenge the assumptions, methodologies, and conclusions put forward by proponents. As a result, decision-makers are frequently relying on incomplete or inaccurate data when determining whether a development should proceed. This undermines the integrity of environmental assessment processes, creates a risk of approving projects with significant unaccounted climate harms, and erodes public trust in the regulatory system.

Stronger standards for applications – including clear and enforceable requirements for independent verification, the use of best-available science, reporting of all greenhouse gas emissions (scope 1, 2 and 3) and transparent disclosure of climate modelling methods and assumptions – would improve accuracy and consistency in climate impact assessments. This in turn would enable regulators to make more informed and evidence-based decisions, while ensuring that projects which carry unacceptable environmental and climate risks are properly identified and rejected.

Further, improvements are still needed to ensure accurate reporting of greenhouse gas emissions under the national reporting frameworks. GHG emissions are required to be reported by proponents under the National Greenhouse and Energy Reporting Scheme (**NGERS**). However, NGERS estimates, particularly in relation to fugitive methane emissions, are highly controversial, unlikely to be reliable, and likely to lead to emissions estimates substantially lower than actual emissions. Data from the International Energy Agency, and independent reports from the Institute for Energy Economics and Financial Analysis, Open Methane, and Ember Climate have shown that Australia’s actual methane emissions are being significantly under reported.<sup>6</sup> This undermines the intent of the Guide, the integrity of the Net Zero Dashboard, and ultimately jeopardises legislated NSW (and national) GHG emissions reduction commitments.

The federal Climate Change Authority (**CCA**) has recognised the significant problems with NGERS methods for fugitive methane emissions and in December 2023 made a number of recommendations to address this.<sup>7</sup> EDO recommended that the Guide implement the CCAs recommendations through not permitting proponents to use so-called “lower order” methods to estimate methane emissions, but rather require that best practice site-source reconciliation to do so.

Methane is a potent greenhouse gas and has more than 28 times the warming potential than carbon dioxide over a 100-year period with an atmospheric life of around 12 years. It is responsible

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<sup>6</sup> <https://www.iea.org/data-and-statistics/data-tools/methane-tracker>; IEEFA (2023) Fugitive methane emissions cast dark cloud over Australia’s Net Zero ambitions. Available at <https://ieefa.org/articles/fugitive-methane-emissions-cast-dark-cloud-over-australias-net-zero-ambitions>; Open Methane (2023) Open Methane’s First Results Build the Urgent Case for Improved Emissions Measurements. Available at <https://openmethane.org/analysis/open-methane-first-result-builds-case-for-improved-measurement>; Ember (2024) How an accounting shift could conceal millions of tonnes of coal mine emissions. Available at <https://ember-climate.org/insights/research/accounting-shift-could-conceal-millions-of-tonnes-of-emissions/#supporting-material>.

<sup>7</sup> See <https://www.dcceew.gov.au/climate-change/emissions-reporting/national-greenhouse-energy-reporting-scheme/cca-review-nger-legislation>.

for around 30% of the rise in global temperatures since the industrial revolution. Rapid and sustained reductions in methane emissions are key to limiting global warming to 1.5°C in the immediate future. Fortunately, commercially competitive technologies already exist to significantly reduce fugitive methane emissions.

Inaccurate estimation and reporting of methane emissions is a key source of misinformation that is hindering efforts to determine an accurate carbon budget and GHG emissions reductions targets and progress.

#### Recommendations:

- 3. That environmental laws be amended to require proponents to provide independently verified, transparent, and scientifically robust information on the climate impacts of their projects in application materials and for ongoing reporting.**
- 4. That adequate resources must be allocated to assessment agencies to enable rigorous review and enforcement of these requirements.**

*Thank you for the opportunity to make this submission.  
Please do not hesitate to contact our office should you have further enquiries.*

**Appendix A: Summary of main EDO complaints to Regulators around misleading information re climate and energy-2022-2025**

<b>Date</b>	<b>Company</b>	<b>Nature of misleading information</b>	<b>Regulator</b>
August 2022	Australian Gas Networks Ltd	Renewable gas claims that hydrogen blended with gas is zero emissions and renewable when a blend and only a proportion of gas	Ad Standards (dismissed)  ACCC (civil enforcement action 2025)
August 2022	Ampol	Ampol has Carbon neutral fuel solution <sup>8</sup>  Business customers can offset their emissions associated with the consumption of fossil fuels namely petrol	Ad Standards (Dismissed complaint)
September 2022	Glencore PLC	Glencore’s claims of being net zero by 2050 <sup>9</sup> (while expanding coal mines), with targets within Paris agreement goals, and aligns with IEA scenarios, as well as Glencore recognises the roe of indigenous people	ACCC & ASIC (no action taken referred to UK regulator)
October 2022	Shell Australia	Claims Shell is a net zero business <sup>10</sup> , provides responsible energy with minimal environmental impact, supports the Paris Agreement, reducing its emissions	Ad Standards (dismissed)
February 2023	Climate Active	Complaint about climate active marks and claims for products making a real difference to climate and environment, despite reliance on offsets	ACCC & ASIC (no action taken to date)
March 2023	Etihad Airways	Etihad is net zero emissions by 2050 and flying shouldn’t cost the earth <sup>11</sup>	ACCC (no action taken to date)

<sup>8</sup> [Comms-Declare-Ampol-EV-Complaint.pdf](#)

<sup>9</sup> [Glencore-complaint-FINAL.pdf](#)

<sup>10</sup> [Ad-Standards-Shell-Complaint-Comms-Declare.pdf](#)

<sup>11</sup> [edo.org.au/wp-content/uploads/2023/04/230322-Complaint-to-ACCC-Etihad-Airways-climate-advertisements.pdf](#)

March 2023	Toyota Australia	Toyota is aiming for net zero by 2050 <sup>12</sup> , hybrids reduce reliance on fossil fuels, hybrids produce less CO2, hybrids easy as charge as go without needing to be plugged in	ACCC (no action to date)
June 2023	NeuRizer Ltd	First carbon neutral fertiliser in world <sup>13</sup> , certified carbon neutral organisation, only carbon neutral fertiliser in Australia when propose to make through in-situ gasification from brown coal	ASIC (investigated claims and some claims withdrawn)
June 2023	APPEA	Claims around future of gas website <sup>14</sup> particularly claims gas is 50% cleaner than coal	Ad Standards (upheld) ad withdrawn  ACCC (no action to date)
July 2023	Woodside Energy Ltd	Complaint about hydrogen <sup>15</sup> claiming to be lower carbon without clarifying blue hydrogen still has emissions	Ad Standards (advert withdrawn)
September 2023	Gas Energy Australia	Claims around renewable LPG being zero emissions <sup>16</sup> and better than electrification and reliable energy	Ad Standards (dismissed)
September 2023	Gemena	Renewable gas is low or no cost and delivered through existing network, help reduce emissions, long term future and safe for home use	ACCC (no action to date)
October 2023	Woodside Energy Ltd	Claims about scientific basis of seismic testing <sup>17</sup> and no impact on whale migration routes	Ad Standards (dismissed)
October 2023	Bravus	Claim that Bravus is in forefront of energy transition <sup>18</sup> , progressing to lower	Ad Standards (dismissed)

<sup>12</sup> [edo.org.au/wp-content/uploads/2023/10/23.03.02\\_ACCC\\_Complaint\\_Toyota.pdf](https://edo.org.au/wp-content/uploads/2023/10/23.03.02_ACCC_Complaint_Toyota.pdf)

<sup>13</sup> [edo.org.au/wp-content/uploads/2023/07/EDO-NeuRizer-Complaint-to-ASIC.pdf](https://edo.org.au/wp-content/uploads/2023/07/EDO-NeuRizer-Complaint-to-ASIC.pdf)

<sup>14</sup> [edo.org.au/wp-content/uploads/2023/10/23.06.27\\_Ad\\_Standards\\_Complaint\\_APPEA\\_Future\\_of\\_Gas\\_Website.pdf](https://edo.org.au/wp-content/uploads/2023/10/23.06.27_Ad_Standards_Complaint_APPEA_Future_of_Gas_Website.pdf)

<sup>15</sup> [Ad\\_Standards\\_Complaint\\_Woodside\\_Radio\\_Advertisement\\_re\\_Hydrogen.pdf](https://edo.org.au/wp-content/uploads/2023/09/Climate-Tasmania-Ad-Standards.pdf)

<sup>16</sup> [edo.org.au/wp-content/uploads/2023/09/Climate-Tasmania-Ad-Standards.pdf](https://edo.org.au/wp-content/uploads/2023/09/Climate-Tasmania-Ad-Standards.pdf)

<sup>17</sup> [23.10.11\\_Ad\\_Standards\\_Complaint\\_Woodside\\_Website\\_and\\_Newsletter\\_Whales\\_and\\_Seismic\\_Testing.pdf](https://edo.org.au/wp-content/uploads/2023/10/23.10.11_Ad_Standards_Complaint_Woodside_Website_and_Newsletter_Whales_and_Seismic_Testing.pdf)

<sup>18</sup> [Ad\\_Standards\\_complaint\\_ARRCC\\_re\\_Bravus.pdf](https://edo.org.au/wp-content/uploads/2023/10/23.10.11_Ad_Standards_Complaint_ARRCC_re_Bravus.pdf)

		carbon future, meeting challenge of climate change	
December 2023	Whitehaven Coal Ltd	Claim that BHP and Whitehaven around mine sale and whether included Blackwater South and further approvals required to mine the area	ASIC & ASX (no action to date)
December 2023	Woolworths Ltd	Claims around whether green bonds having positive environmental impact and additional and positive climate impact	ASIC (some action taken)
April 2024	Santos Ltd	Santos gas is keeping the lights on providing essential electricity for NSW and deliver critical gas supply on East Coast	ACCC (no action taken to date)
May 2024	Australian Gas Network	MasterChef renewable gas promotion that integrated into networks and carbon neutral, fewer emissions than fossil gas and low cost and feasible	ACCC (similar claims to civil enforcement action commenced by ACCC in 2025)
October 2024	Qantas Airways Ltd	Acting sustainably, protecting travel/barrier reef, net zero emissions by 2050, use high integrity offsets and reduces emissions	ACCC (no action to date)
February 2025	Australian Gas Infrastructure Group	Gas cooktops have lower average emissions compared to electric, generally lower emissions and reliable	Ad Standards (upheld)
March 2025	Diamond Energy	Claims electricity is zero emissions when not zero unless purchase green power and double counting of offsets	ACCC (no action to date)
April 2025	Australians For Natural Gas	Claims around environmental benefits of gas, and providing energy security	ACCC (no action to date)
July 2025	NSW Mining	Claims around coal being needed for energy security, powering homes and high quality and needed for many years to come	ACCC (no action to date)

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## Appendix B:

Source	Statement
<b>Natural gas is an important backup when conditions aren't ideal for renewables and demand is high</b>	
<b>Website<sup>19</sup></b>	<ul style="list-style-type: none"> <li>• <i>As Australia transitions from coal to more renewable power generation, electricity generated by Australian natural gas will be critical in supporting the grid.</i></li> <li>• <i>When the sun doesn't shine and the wind doesn't blow for a long time, that's where we need gas as the ultimate backstop for reliability.</i></li> <li>• <i>Renewables backed up by natural gas - when conditions don't support renewables, and demand is high that's where natural gas can help.</i></li> <li>• <b>NATURAL GAS IS PROVIDING RELIABLE POWER NOW AND INTO THE FUTURE</b></li> <li>• <i>Natural gas power generation is critical to maintaining the reliability of Australia's electricity networks, today and into the future.</i></li> </ul>
<b>YouTube<sup>20</sup></b>	<ul style="list-style-type: none"> <li>• <i>(start from 9s of the video) Australian natural gas power plants are important backup when conditions aren't ideal for renewables and demand is high because natural gas can be turn on and off on demand. That's how the Australian Natural gas helps keep the country running</i></li> </ul>
<b>Media Release<sup>21</sup> Opinion piece<sup>22</sup></b>	<ul style="list-style-type: none"> <li>• <i>Australian Energy Producers Chief Executive Samantha McCulloch said locking gas out of the CIS was at odds with the Government's own advice on the critical role of gas in backing up renewables in the National Electricity Market (NEM) and for</i></li> </ul>

<sup>19</sup> <https://keepingthecountryrunning.com.au/electricity/>

<sup>20</sup> [https://www.youtube.com/watch?v=fHa3b7dvtWY&ab\\_channel=AustralianEnergyProducers](https://www.youtube.com/watch?v=fHa3b7dvtWY&ab_channel=AustralianEnergyProducers)

<sup>21</sup> [https://energyproducers.au/all\\_news/media-release-locking-gas-out-of-capacity-investment-scheme-risks-higher-power-prices-and-blackouts/](https://energyproducers.au/all_news/media-release-locking-gas-out-of-capacity-investment-scheme-risks-higher-power-prices-and-blackouts/)

<sup>22</sup> [https://energyproducers.au/all\\_news/opinion-article-by-samantha-mcculloch-in-the-news-corp-publications-on-critical-role-of-natural-gas/](https://energyproducers.au/all_news/opinion-article-by-samantha-mcculloch-in-the-news-corp-publications-on-critical-role-of-natural-gas/)

*delivering reliable and affordable electricity (from media release )*

13 Feb 2025

## Media release: Locking gas out of Capacity Investment Scheme risks higher power prices and blackouts

Australians face paying more for their electricity and increased risk of blackouts under the Federal Government's deal with the Greens to keep gas out of the Capacity Investment Scheme (CIS).

Australian Energy Producers Chief Executive Samantha McCulloch said locking gas out of the CIS was at odds with the Government's own advice on the critical role of gas in backing up renewables in the National Electricity Market (NEM) and for delivering reliable and affordable electricity.

- 
- ***Gas is also needed to put downward pressure on electricity prices. In its 2024 Integrated System Plan for the NEM, AEMO found that “renewable energy, connected by transmission and distribution, firmed with storage and backed up by gas-powered generation is the lowest-cost way to supply electricity to homes and businesses as Australia transitions to a net zero economy***

Company	Source	Statement
Woodside Energy	<p>YouTube Video 1<sup>23</sup></p> <p>YouTube Video 2<sup>24</sup></p>	<ul style="list-style-type: none"> <li>• <i>(line starts at 11s of the video 1) Because gas can provide a reliable sources of energy for when renewables can't meet demand. Supporting renewables by backing them with gas</i></li> <li>• <i>(video 2) Gas, like the natural gas produced by Australia's Woodside helps meet one of the great challenges facing the transition to a lower carbon world by providing the world's growing population a secure source of every day energy as new energy products and lower carbon technologies are developed.</i></li> </ul>

<sup>23</sup> <https://youtu.be/LsxspngkC4Y>

<sup>24</sup> [https://www.youtube.com/watch?v=4FY\\_8OsyawI&ab\\_channel=WoodsideEnergy](https://www.youtube.com/watch?v=4FY_8OsyawI&ab_channel=WoodsideEnergy)

	<p>Speech 1<sup>25</sup></p> <p>Speech 2<sup>26</sup></p>	<ul style="list-style-type: none"> <li><b><i>It matters because of our role in progressing the energy transition, providing an energy supply that, when used to generate electricity, typically has half the lifecycle emissions of coal and can firm and enable intermittent renewables. (P2 of speech 1)</i></b></li> </ul> <p>As an industry, we cannot shy away from explaining why what we do matters.</p> <p>It matters because we provide a reliable energy supply to our customers, support thousands of jobs through our business activities and make a contribution to the economy and community.</p> <div style="border: 1px solid red; padding: 5px;"> <p>It matters because of our role in progressing the energy transition, providing an energy supply that, when used to generate electricity, typically has half the lifecycle emissions of coal and can firm and enable intermittent renewables.</p> </div> <ul style="list-style-type: none"> <li><b><i>The fact is that gas is an ideal source of always-available power to support Australia’s expanding renewable energy grid.</i></b></li> </ul> <p><b><i>In the words of Australia’s energy market operator, gas is the “ultimate backstop” to ensure grid reliability. (p4 of speech 2)</i></b></p> <div style="border: 1px solid red; padding: 5px;"> <p>The fact is that gas is an ideal source of always-available power to support Australia’s expanding renewable energy grid.</p> <p>In the words of Australia’s energy market operator, gas is the “ultimate backstop” to ensure grid reliability.</p> </div>
	<p>Annual Report 1<sup>27</sup></p> <p>Annual Report 2<sup>28</sup></p>	<ul style="list-style-type: none"> <li><b><i>In addition to this growth of renewables, sustained use of natural gas can preserve energy security, support renewables by firming their intermittency and also directly replace coal where infrastructure allows. (p7 of report 1)</i></b></li> </ul>  <p>Coal demand is continuing to grow in the Asia Pacific region and is driving global GHG emissions growth. Addressing this growth while maintaining energy security has been a priority for global climate and energy policy. In response to policy signals and technology improvement, renewables are growing quickly, especially in China. In addition to this growth of renewables, sustained use of natural gas can preserve energy security, support renewables by firming their intermittency and also directly replace coal where infrastructure allows. To illustrate the potential of this, in 2023 coal-to-gas switching was the largest single driver of emissions reduction in the US power sector. As well as power generation, we also expect sustained use of natural gas in heavy transport and other hard-to-abate sectors.</p> <p>No figures on this page will be updated on page 14 in red text.</p> <p>2024 CLIMATE UPDATE 1</p>

<sup>25</sup> [https://www.woodside.com/docs/default-source/media-releases/2025/evp-coo-australia-speech-to-energy-exchange-australia-110325.pdf?sfvrsn=6d647de3\\_4](https://www.woodside.com/docs/default-source/media-releases/2025/evp-coo-australia-speech-to-energy-exchange-australia-110325.pdf?sfvrsn=6d647de3_4)

<sup>26</sup> [https://www.woodside.com/docs/default-source/media-releases/2025/ceo-speech-to-the-melbourne-mining-club-060225.pdf?sfvrsn=c3b5c4fd\\_3](https://www.woodside.com/docs/default-source/media-releases/2025/ceo-speech-to-the-melbourne-mining-club-060225.pdf?sfvrsn=c3b5c4fd_3)

<sup>27</sup> [https://www.woodside.com/docs/default-source/investor-documents/major-reports-\(static-pdfs\)/2024-annual-report/climate-update-2024.pdf?sfvrsn=6fd6a2bd\\_5](https://www.woodside.com/docs/default-source/investor-documents/major-reports-(static-pdfs)/2024-annual-report/climate-update-2024.pdf?sfvrsn=6fd6a2bd_5)

<sup>28</sup> [https://www.woodside.com/docs/default-source/investor-documents/major-reports-\(static-pdfs\)/2024-annual-report/annual-report-2024.pdf?sfvrsn=b48b241c\\_3](https://www.woodside.com/docs/default-source/investor-documents/major-reports-(static-pdfs)/2024-annual-report/annual-report-2024.pdf?sfvrsn=b48b241c_3)

- ***Our core product of LNG is expected to play a sustained role through the energy transition. In particular, LNG can help customers in major economies meet their energy security and decarbonisation goals, including by displacing coal and backing up and supplementing energy from renewable sources (p6 of report 2)***

Today, we are now a global energy company that helps people lead better lives.

Today, we are playing our part in the global transition to a lower-carbon future by supplying vital energy for the world's needs today and investing in new energy for tomorrow.

Our core product of LNG is expected to play a sustained role through the energy transition. In particular, LNG can help customers in major economies meet their energy security and decarbonisation goals, including by displacing coal and backing up and supplementing energy from renewable sources.

We are also investing in new products and services, such as lower-carbon ammonia and carbon capture and storage (CCS), that can

- ***Firming renewables: Natural gas can support more renewables to replace coal, by “firming” up their intermittent supply along with batteries (p20 of report 2)***

Natural gas demand is sustained by these factors:

- **Transition priorities:** While renewable sources of energy are growing, particularly in countries like China, they have not reached the scale to fully replace coal at current energy demand levels. Total energy demand is also expected to grow as a result of extra power demand expected for electric vehicles and data centres. Sustaining gas supply levels so that available renewables can be directed to higher emissions reductions (like substituting coal first) can support both energy security and faster emissions reduction.<sup>8</sup>

**Firming renewables:** Natural gas can support more renewables to replace coal, by “firming” up their intermittent supply along with batteries.

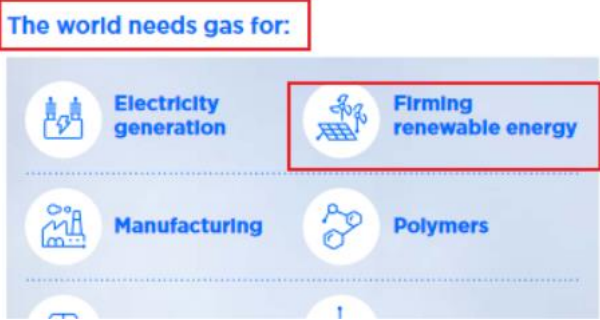
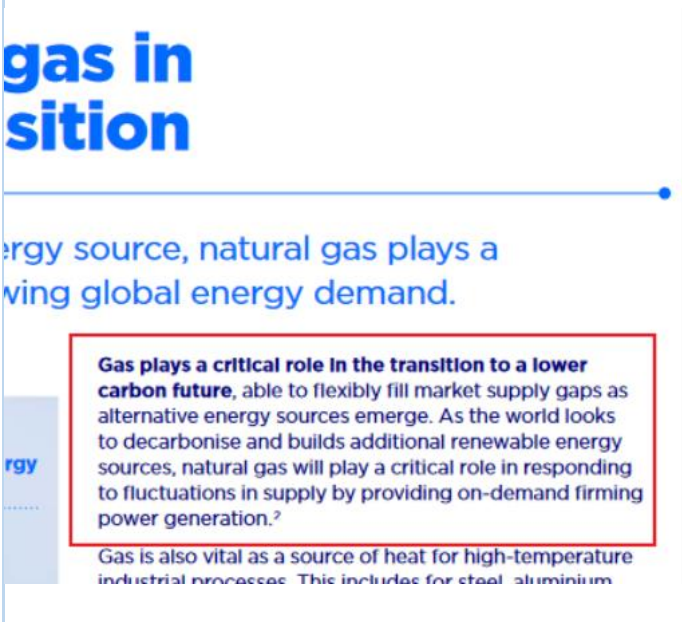
- **Fuel switching:** Natural gas is an established substitute for coal in power generation where infrastructure exists and can accelerate the impact of coal-to-renewables switching. In 2023, coal-to-gas

- ***We recognise that natural gas can support more renewables to replace coal, by ‘firming’ up their intermittent supply along with batteries (p54 of the report 2)***

		<p><b>MATERIAL TOPIC UPDATES</b>  <b>3.8.5 Climate</b></p> <p>Climate change is a strategic risk and opportunity for Woodside. We anticipate that energy markets will continue to evolve, creating investment opportunities in existing and new products. <b>We recognise that natural gas can support more renewables to replace coal, by 'firming' up their intermittent supply along with batteries.</b></p> <ul style="list-style-type: none"> <li>•</li> </ul>
	<p><b>LinkedIn Post<sup>29</sup></b></p>	<ul style="list-style-type: none"> <li>• <b>Gas, like the natural gas produced by Australia's Woodside, helps meet one of the great challenges facing the transition to more renewable energy, like wind and solar. Because gas can provide a reliable source of energy for when renewables can't meet demand.</b></li> </ul>
<p><b>Santos</b></p>	<p><b>Annual Report<sup>30</sup></b></p>	<ul style="list-style-type: none"> <li>• <b>We recognise the need to reduce emissions while ensuring energy security and economic stability. We believe that natural gas plays a vital role in the energy transition to provide reliability and constant supply as a supplement to renewable energy. We invest in CCS projects to decarbonise our own and third-party emissions. The Australian Energy Market Operator (AEMO) has highlighted the role of gas in supporting renewables, with its ability to fill supply gaps and demand spikes crucial for reliability and security in a renewable energy power system.</b></li> </ul> <div data-bbox="730 1263 1385 1682" style="background-color: #e6f2ff; padding: 10px; margin-top: 20px;"> <p><b>Balanced energy approach:</b></p> <p>We recognise the need to reduce emissions while ensuring energy security and economic stability. We believe that natural gas plays a vital role in the energy transition to provide reliability and constant supply as a supplement to renewable energy. We invest in CCS projects to decarbonise our own and third-party emissions. The Australian Energy Market Operator (AEMO) has highlighted the role of gas in supporting renewables, with its ability to fill supply gaps and demand spikes crucial for reliability and security in a renewable energy power system.<sup>2</sup></p> </div> <ul style="list-style-type: none"> <li>•</li> </ul>

<sup>29</sup> [https://www.linkedin.com/posts/woodside-energy\\_support-renewables-by-backing-them-with-gas-activity-7290635882607337476--nCe?utm\\_source=share&utm\\_medium=member\\_desktop&rcm=ACoAAEjofJoBU3210iVUuzocn3OWtGUpuBYnoa0](https://www.linkedin.com/posts/woodside-energy_support-renewables-by-backing-them-with-gas-activity-7290635882607337476--nCe?utm_source=share&utm_medium=member_desktop&rcm=ACoAAEjofJoBU3210iVUuzocn3OWtGUpuBYnoa0)

<sup>30</sup> <https://www.santos.com/wp-content/uploads/2025/02/FINAL-Appendix-4E-and-2024-Annual-Report.pdf>

	<p>Climate Change Action Plan</p>	<ul style="list-style-type: none"> <li>• <i>The world needs gas for: ...Firming renewable energy (p6)</i></li> </ul>  <ul style="list-style-type: none"> <li>• <i>Gas plays a critical role in the transition to a lower carbon future, able to flexibly fill market supply gaps as alternative energy sources emerge. As the world looks to decarbonise and builds additional renewable energy sources, natural gas will play a critical role in responding to fluctuations in supply by providing on-demand firming power generation (p6)</i></li> </ul> 
<p>Jemena</p>	<p>YouTube 1<sup>31</sup>          YouTube 2<sup>32</sup>          YouTube 3<sup>33</sup></p>	<ul style="list-style-type: none"> <li>• <i>(54s-1.05s of video 1) If we get it right, transitioning to renewable gas will help Australia reduce carbon emissions while ensuring gas is available to homes</i></li> </ul>

<sup>31</sup> <https://youtu.be/aCFBCimzTf4?si=B71AOKWtBks5Ip0u>

<sup>32</sup> [https://youtu.be/wOohqv0NLH0?si=kbF\\_nMeGvY4h4pbH](https://youtu.be/wOohqv0NLH0?si=kbF_nMeGvY4h4pbH)

<sup>33</sup> <https://youtu.be/hOeFztDmgm4?si=e5UcYtQQK7aloVX2>

		<p><i>and businesses alongside other Renewable Energy Solutions like solar</i></p> <ul style="list-style-type: none"> <li>• <i>Lines from Video 2</i></li> <li>○ <i>(01s-05s)gas is on the move and the direction is toward renewable gas.</i></li> <li>○ <i>(05s-17s)renewable gas could be good for our customers in the future providing them with choice to keep using gas as we transition our Network and repurpose our existing gas infrastructure for a renewable gas future.</i></li> <li>○ <i>3. (27s-36s)many industrial customers are unable to Electrify their businesses as they need the feed stock or high temperatures provided by gas to operate safely and effectively</i></li> <li>• <i>(03s-22s from video 3) Gas plays a really important role in Australia's Energy System as we've seen over the past few years it's critical in keeping our lights on and our homes warm. Gas plays an important role in firming the energy system and generating electricity when base load power stations and Renewables like solar and wind aren't available</i></li> </ul>
Shell	Speech <sup>34</sup>	<ul style="list-style-type: none"> <li>• <i>The critical role of gas in the energy transition and for the Australian economy is in the spotlight again.</i></li> <li>• <i>And natural gas – which is critical for our national prosperity, for our basic energy security, and to support a deeper penetration of renewable generation – has been in the crosshairs of this debate for too long.</i></li> <li>• <i>As noted in the Grattan Institute’s Keeping the Lights On report last year, without gas-powered generation, Australia would not be able to support deeper penetration of renewables and our electricity system would become increasingly unstable.</i></li> <li>• <i>Gas and LNG are critical enablers of the energy transition in Australia and our region</i></li> </ul>

<sup>34</sup> <https://www.shell.com.au/media/2025-media-releases/australian-domestic-gas-outlook-speech.html>

		<ul style="list-style-type: none"> <li>• <b><i>In Shell’s opinion, there is not a single credible energy transition scenario that excludes natural gas.</i></b></li> <li>• <b><i>Gas is needed to firm renewables, it will be increasingly needed as back up as coal exits and let’s not forget it cannot yet be replaced in the production of many essential products or manufacturing processes.</i></b></li> </ul>
BP	<p>Speech 1<sup>35</sup></p> <p>Speech 2<sup>36</sup></p>	<ul style="list-style-type: none"> <li>• <b><i>Demand for gas in these industries will remain until commercially viable alternatives are available and gas powered generation will need to continue to maintain grid reliability during periods of low generation from renewable sources (from speech 1)</i></b></li> </ul> <p>From that supply, gas is used to process food, to process critical minerals and in manufacturing.</p> <div style="border: 1px solid red; padding: 5px; margin: 10px 0;"> <p>Demand for gas in these industries will remain until commercially viable alternatives are available and gas powered generation will need to continue to maintain grid reliability during periods of low generation from renewable sources.</p> </div> <ul style="list-style-type: none"> <li>•</li> <li>• <b><i>For example, gas has an important and ongoing role to play in the energy transition for decades to come. It’s needed to support the energy transition by backing-up renewables, processing critical minerals and for manufacturing, not to mention, enabling production of crucial commodities, and supporting our regional partners to decarbonize. (from speech 2)</i></b></li> </ul> <p>For example, gas has an important and ongoing role to play in the energy transition for decades to come. It’s needed to support the energy transition by backing-up renewables, processing critical minerals and for manufacturing, not to mention, enabling production of crucial commodities, and supporting our regional partners to decarbonize.</p> <ul style="list-style-type: none"> <li>•</li> </ul>

<sup>35</sup> [https://www.bp.com/en\\_au/australia/home/media/speeches-articles/the-importance-of-gas-to-Australias-energy-transition.html](https://www.bp.com/en_au/australia/home/media/speeches-articles/the-importance-of-gas-to-Australias-energy-transition.html)

<sup>36</sup> [https://www.bp.com/en\\_au/australia/home/media/speeches-articles/balancing-Australias-energy-transition.html](https://www.bp.com/en_au/australia/home/media/speeches-articles/balancing-Australias-energy-transition.html)