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THE SAFEGUARD MECHANISM:

AUSTRALIA'S SELF-IMPOSED 'TRUMP TARIFF'

Adam Creighton
Senior Fellow and Chief Economist

Saxon Davidson
Research Fellow

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Executive Summary

The Safeguard Mechanism (SM) is the federal government's marquee net zero policy, which targets and mandates large projects and facilities to reduce emissions.

The SM mandates that Australia's most emission-intensive facilities must reduce their carbon emissions below a specified yearly threshold, with the excess to be offset by way of purchasing and surrendering carbon credits.

The use of the carbon credits is to offset emissions to a net baseline level or below. Each carbon credit represents a tonne of carbon dioxide or carbon dioxide equivalent and, by mandating entities to participate in the trade and the surrender of carbon credits, functions as a form of carbon tax.

The analysis of the emissions data of 233 facilities currently listed in the Safeguard Mechanism database finds that:

- The SM will impose a carbon tax cost of up to $1.7 billion per annum to 2030, more than the projected cost of the tariffs imposed on Australia by the United States.
- 80 per cent of projects targeted by the SM are exporters of goods.
- Western Australia, which accounts for 35 per cent of all emissions nationally, will be the most impacted state, with a cumulative carbon tax cost of up to $4 billion between 2024 and 2030.

Over time, as the emission threshold for inclusion in the Safeguard Mechanism automatically declines, more facilities will fall within the scope of the Safeguard Mechanism, meaning more projects will likely be liable to pay this carbon tax.

In an environment of heightened uncertainty in international trade, due in part to the global tariffs imposed from the world's foremost economic power, it is vital that Australia supports its exporters.

Australia cannot control the tariffs that are placed on its exports, but Australian governments at a state and federal level can control the regulatory burdens they are imposing.

As the analysis in this paper finds, even without calculating the lost economic opportunities and activity resulting from emission reduction mandates, the carbon credit cost under the safeguard mechanism represents a more significant risk to Australia's exporters than the tariffs imposed by the Trump Administration.

Introduction

The announcement on 2 April 2025 of the Trump administration's wide-ranging "Liberation Day" tariffs on practically all countries, including Australia, is likely to have a significant impact on international trade.[1]

Tariffs have a direct impact by placing a tax on the exporter of goods, and have the indirect effect of placing jobs at risk in sectors involved in the supply chain of trade. For some countries, the indirect effects can be as large or larger than the direct impact, given their particular focus on China. The ramifications for complex supply chains, where production is spread across many jurisdictions, adds further cost and uncertainty.

Any uncertainty surrounding international trade reinforces the need to reassess the self-imposed barriers on Australia's exporters. Australia's most valuable export commodities are minerals, natural gas, and agricultural products – the extraction or production of which are 'carbon intensive', meaning they are activities that produce a high amount of greenhouse gas emissions relative to unit of output.

These industries have become subject to added regulation by the federal government under the auspices of the net zero by 2050 target, which require the emission of greenhouse gas emissions to be reduced, and any residual emissions released to be captured or taken out of the atmosphere. Mining, manufacturing, and agriculture, located predominantly in regional Australia are incompatible with the net zero target. As previous IPA analysis has found, the policy of net zero puts at risk over 650,000 existing jobs and 478,000 potential jobs, which are unlikely to be replaced by jobs in the renewable energy sector.[2]

To illustrate the fact that the relative impact of net zero far exceeds that of the US tariffs, this paper assesses the direct costs incurred by Australian firms complying with just one net zero policy: the Safeguard Mechanism. The analysis finds that the direct cost of this policy alone could be at least as costly as the direct impact of US tariffs on Australian exporters.

Australia exported $23.8 billion worth of goods to the US in 2024, and imported $50.5 billion in return, making it among the handful of nations globally to run a trade deficit with the US.

It is impossible to estimate accurately how much of the burden of the 10 per cent tariff will fall on Australian exporters. US importers of Australian goods will incur the direct burden of paying the 10 per cent tariff to the US government, but it is possible Australian exporters will lower their prices in order to remain competitive with domestic US alternatives.

Were Australians, as opposed to American consumers, to bear half the tariff, the cost would be approximately $1.2 billion, based on 2024 exports levels.

The SM mandates that Australia's most emission intensive facilities either reduce their emissions each year or purchase carbon credits, known as safeguard mechanism credit units (SMCs), from other businesses to, in effect, pay to emit above a certain level. This acts in effect as a self-imposed tariff, or a carbon tax, on domestic industry. The cost of complying with the SM will ultimately depend on how Australian businesses respond to it. Either businesses will reduce their output to reduce their emissions, incurring an economic loss, or they will purchase SMC's, incurring a regulatory cost. Both are significant costs. Assuming that the targeted facilities continue to emit at their current level, the aggregated cost of compliance with the SM would be up to $1.7 billion per year. In other words, it is possible the Trump tariffs, for all the attention they have received, will be less damaging to Australian industry than the SM.

Whatever the outcome, this analysis underscores not only the need to repeal the SM, but the broader folly of Australia continuing to undermine the competitiveness of its domestic and export industries through policies, such as net zero, at a time of continuing economic uncertainty.

1 A further round of 'reciprocal' tariffs was due to come into effect, excluding Australia, on 1 August 2025. Legal challenges to many of the new US tariffs are expected, based on differing interpretations within the US of the International Emergency Economic Powers Act of 1977, which could see some of them rescinded or reduced.

2 Cian Hussey and Daniel Wild, *Net Zero Jobs: An Analysis of the Employment Impacts of a Net Zero Target in Australia* (Institute of Public Affairs Research Report, February 2021); Daniel Wild, *The Economic and Employment Consequences of Net Zero Emissions by 2050 in Australia* (Institute of Public Affairs Research Report, April 2022).

The Safeguard Mechanism: Australia's de facto carbon tax

The SM was established in 2016. In its original form, the SM legislated baselines for emissions from facilities emitting more than 100,000 tonnes of carbon dioxide equivalent (CO_2-E) per year. To meet their obligations under the SM, entities would either reduce their emissions or, alternatively, surrender Australian Carbon Credit Units they have either purchased or created through carbon abatement activities such as land reforestation.

The scheme is designed to curtail 'scope 1 emissions'—namely, emissions that have occurred in Australia, as distinct from scope 3 emissions, where the means of emitting greenhouse gases occur overseas but are claimed to originate in Australia, such as the export of coal.[3]

The SM was significantly strengthened by the Albanese government's passage of the *Safeguard Mechanism (Crediting) Amendment Act 2023*. Following these changes, the baseline level that facilities must reduce their emissions to will decline by 4.9 per cent each year, either through direct emission reductions or by the purchase and surrender of credits, including new Safeguard Mechanism Credits (SMC) which can be purchased from other facilities that emit below their regulated level.

To pass the updated SM through parliament, the federal government agreed to legislate a hard cap on aggregate scope 1 gross emissions from all covered facilities. This is intended to ensure that even if some facilities offset their emissions through credits, actual aggregate emissions from all facilities is under a specified limit. Associated with the hard cap is the "pollution trigger", whereby new or expanded projects are assessed for their potential to impact the cap. If a project is assessed as likely to cause a breach, this triggers intervention by the climate change minister to impose conditions on the project.

Integral to the SM is the purchase, exchange, and surrender of tradeable carbon units: ACCUs and SMCs.

By making it a requirement for covered facilities to participate in the carbon unit scheme, the government has effectively put a price on the emission of carbon dioxide. The Safeguard Mechanism therefore operates as a *de facto* carbon tax on Australia's largest facilities.

Currently, the SM applies to the largest 233 emitting facilities in the Australian economy, of which roughly eight-in-ten are located in regional Australia and almost nine-in-ten are in the critical industries of mining and manufacturing. [4]

3 Sophie Power, "Australia's climate safeguard mechanism: a quick guide", *Parliament of Australia* (December 2018).

4 Saxon Davidson, *Submission to the Inquiry into the Safeguard Mechanisms (Crediting) Amendment Bill 2022* (Institute of Public Affairs Submission, January 2023).

Counting the cost of the Safeguard Mechanism

The total costs of the safeguard mechanism are multi-faceted and highly uncertain. For instance, a significant cost of the safeguard mechanism will be incurred in the form of lost economic output due to reduced industrial activity (to meet emissions reduction targets), or the unrealised value of projects that never commence because of the regulatory hurdles or uncertainty.

This analysis estimates a compliance cost associated with the value of carbon credits that facilities are required to obtain and then surrender in order to reduce their emissions under the baseline level. Where covered emissions exceed baseline emissions, the entity must either reduce covered emissions or purchase and surrender ACCUs and SMCs. One ACCU/SMC represents one tonne of carbon dioxide equivalent.

The cost of the credits is set by market forces and is therefore subject to change over time. So too are the covered and baseline emission levels for facilities. Accordingly, this analysis relies on a number of assumptions:

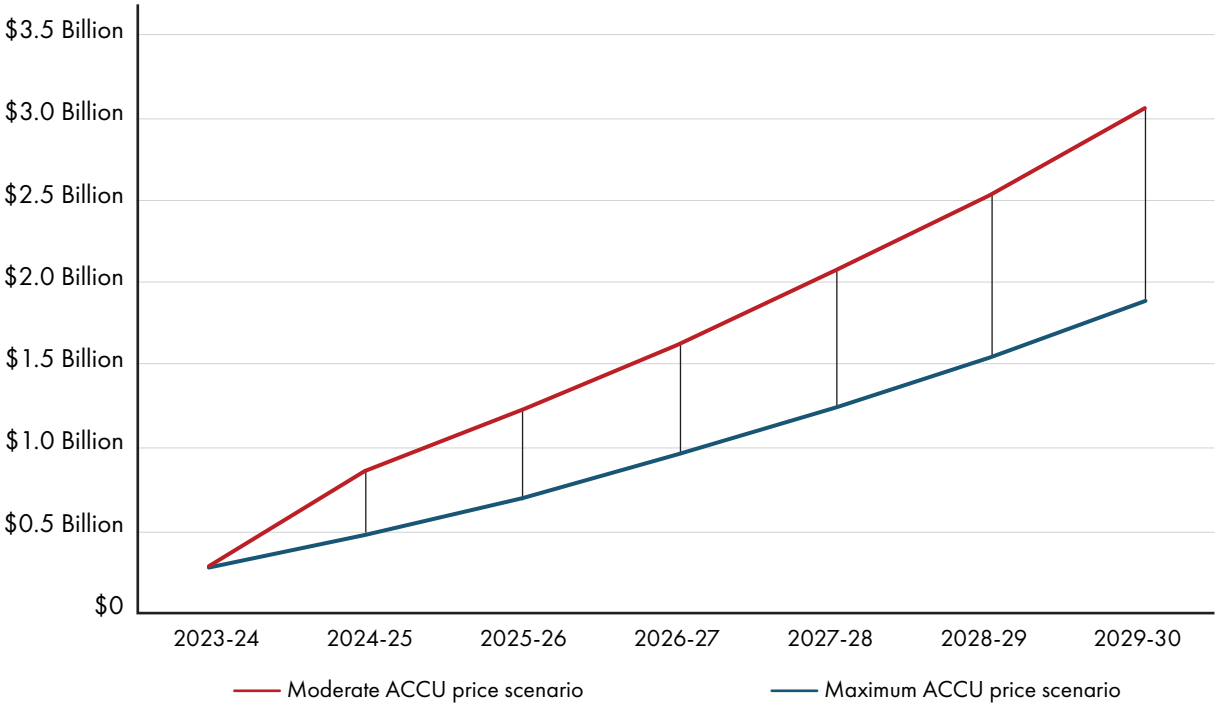
- For the 2023-24 financial year, the Clean Energy Regulator has published data for facility level "covered emissions" and "baseline emissions". Covered emissions are the total carbon dioxide equivalent emissions produced by a facility, whereas baseline emissions represent the level that a facility is required to not exceed.
- After 2023-24, facility level covered emissions (total emissions) are assumed to be constant out to 2030, and total baseline emissions that covered facilities are required to not exceed is assumed to reduce by the default 4.9 per cent each year.
- The cost of Safeguard Mechanism Credits is assumed to stay at the current level out to 2030.
- Two cost estimates are used for the Australian Carbon Credit Units. Analysts have forecast significant price rises in the ACCU market out to 2030, which has precipitated the federal government to introduce a fixed price ceiling, known as the Cost Containment Measure.
  - The moderate ACCU forecast is based on a projection that the ACCU unit price will increase gradually to $60 per unit by 2029-30.[5]
  - The maximum ACCU forecast is based on a projection that facilities are required to buy ACCU's direct from the government under the Cost Containment Measure, which begins at $75 in 2023-24 and increases each year in line with inflation to $100.49 per unit in 2029-30.
- The ratio of ACCUs to SMCs surrendered is assumed to remain the same from 2023-24 to 2029-30.

Some facilities will not rely exclusively on carbon credits to reduce their emissions to the baseline level. They will incur the cost in other ways, such as by reduced output or opting against expanding operations.

On the basis of these assumptions, we estimate that facilities incurred a carbon credit cost of $299.9 million in 2023-24, which will accumulate to between $7.1 billion to 11.7 billion by 2029-20. The annual average over the period will be between $1.02 billion and $1.67 billion.

5 See Core Markets, 'The many facets of ACCU price dynamics – a guide for anyone with carbon exposure' (Published 29 April 2024, updated 6 May 2025): https://coremarkets.co/insights/accu-price-dynamics-a-guide-for-anyone-with-a-carbon-exposure.

CHART 1: ANNUAL CARBON CREDIT COST UNDER THE SAFEGUARD MECHANISM



Source: IPA analysis of Clean Energy Regulator data

Of the 233 facilities listed in the 2023-24 database, 170 will be required to incur a carbon credit cost in 2024-25. This is assumed to increase over time to at least 209 facilities, as the annual reduction in the baseline emissions level will capture more facilities.

TABLE 1: CARBON CREDIT COST BY STATE AND TERRITORY: MODERATE ACCU PRICE SCENARIO

	2023-24	2024-25	2025-26	2026-27
NSW	$107,579,100	$97,105,863	$123,703,433	$153,404,452
NT	$19,035,300	$11,345,314	$14,116,135	$29,816,290
QLD	$173,545,575	$172,030,319	$234,187,489	$303,026,974
SA	$11,640,450	$19,622,188	$27,965,880	$38,124,978
TAS	$313,800	$3,220,360	$6,447,072	$10,060,805
VIC	$33,860,475	$25,435,076	$34,282,193	$43,983,645
WA	$164,206,350	$135,713,022	$225,973,251	$327,161,494
Other	$18,786,750	$18,213,702	$35,854,315	$55,164,738
Australia	$299,926,130	$482,685,844	$702,529,768	$960,743,376

	2027-28	2028-29	2029-30	TOTAL
NSW	$189,518,925	$232,864,487	$282,235,085	$1,186,411,344
NT	$49,450,738	$70,536,467	$92,947,254	$287,247,498
QLD	$378,105,729	$458,208,736	$543,300,940	$2,262,405,761
SA	$49,108,773	$60,960,336	$73,481,898	$280,904,503
TAS	$13,972,453	$18,158,757	$22,598,056	$74,771,303
VIC	$54,730,545	$66,129,843	$78,130,142	$336,551,920
WA	$437,070,651	$554,965,120	$679,830,550	$2,524,920,438
Other	$76,004,435	$98,359,504	$122,095,669	$424,479,113
Australia	$1,247,962,250	$1,560,183,249	$1,894,619,594	$7,148,650,210

Source: IPA analysis of Clean Energy Regulator data

TABLE 1: CARBON CREDIT COST BY STATE AND TERRITORY: MAXIMUM ACCU PRICE SCENARIO

	2023-24	2024-25	2025-26	2026-27
NSW	$107,579,100	$177,945,825	$217,363,350	$261,480,319
NT	$19,035,300	$20,790,209	$24,803,923	$50,822,338
QLD	$173,545,575	$315,244,375	$411,498,500	$516,514,278
SA	$11,640,450	$35,957,524	$49,139,763	$64,984,629
TAS	$313,800	$5,901,288	$11,328,360	$17,148,801
VIC	$33,860,475	$46,609,603	$60,238,364	$74,970,820
WA	$164,206,350	$248,693,179	$397,064,994	$557,651,951
Other	$18,786,750	$33,376,484	$63,000,789	$94,029,171
Australia	$299,926,130	$884,518,487	$1,234,438,044	$1,637,602,307

	2027-28	2028-29	2029-30	TOTAL
NSW	$315,089,797	$379,402,606	$452,575,351	$1,911,436,348
NT	$82,215,658	$114,924,005	$149,044,673	$461,636,107
QLD	$628,629,870	$746,552,601	$871,204,987	$3,663,190,188
SA	$81,647,115	$99,321,758	$117,831,190	$460,522,429
TAS	$23,230,279	$29,585,790	$36,236,895	$123,745,213
VIC	$90,993,742	$107,744,359	$125,284,837	$539,702,199
WA	$726,663,591	$904,196,322	$1,090,135,729	$4,088,612,116
Other	$126,363,222	$160,255,660	$195,785,334	$691,597,410
Australia	$2,074,833,274	$2,541,983,101	$3,038,098,995	$11,711,400,338

Source: IPA analysis of Clean Energy Regulator data

Around 80 per cent of facilities impacted are exporters

An analysis of the 233 safeguard facilities in the 2023-24 financial year finds that 80 per cent of the facilities are involved in the export of goods.[6] Each facility's export status can be viewed within the appendix.

Alarmingly, the data reveals that since 2023-24, 14 of the facilities have closed, temporarily suspended operations, or are at risk.[7] The SM is not the sole catalyst for any of these closures, but it is an added burden on businesses struggling to conduct their daily operations.

Given the uncertain future for global trade, it is important our government provide regulatory certainty and stability, and remove those barriers facing exporters wishing to participate in international trade.

Additionally, many of these facilities trade in our most economically important industries, including coal, gas, iron ore, nickel, and gold. Burdening these industries with strict emission reduction mandates will diminish the economic benefits they provide, including their contributions to direct and indirect employment, their contribution to the nation's energy security, and the revenue they pay – that funds public services and infrastructure such as roads, schools, and hospitals.

6 Clean Energy Regulator, "The Safeguard Mechanism," (2023-24 dataset) https://www.cleanenergyregulator.gov.au/NGER/The-safeguard-mechanism. Export status is determined by best and most recent available information on each individual safeguard facility, lack of reputable information results in the facility being labelled a non-exporter of goods.

7 Ibid.

Western Australia is most impacted by the Safeguard Mechanism

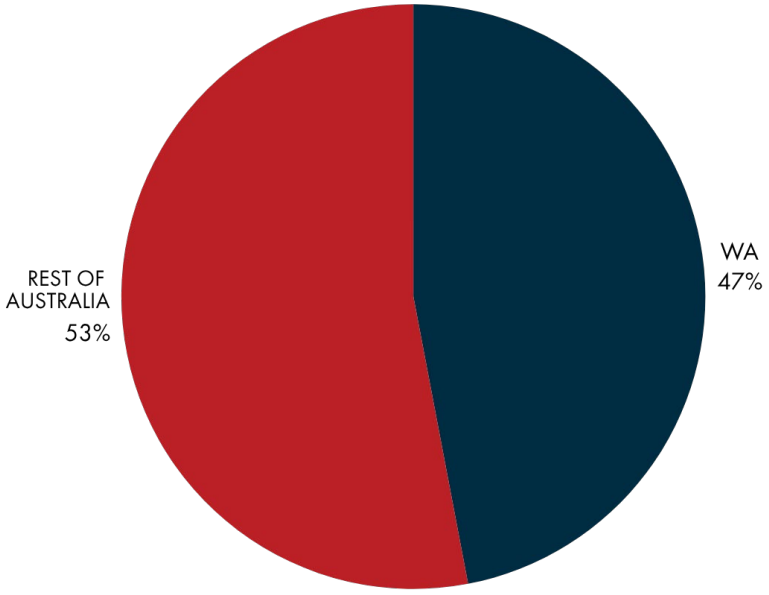
According to the analysis above, Western Australia will be most affected by the compliance requirements under the Safeguard Mechanism.

Western Australia will account for 35 per cent of the carbon tax cost, Queensland 32 per cent, and New South Wales 17 per cent.

This is to be expected, as the Safeguard Mechanism has a disproportionate impact on goods exporting sectors, and Western Australia is a major exporter of goods, such as minerals.

Western Australia represents just under half of all of Australia's goods export market contributors, and produces more than double the value of the next highest state, Queensland.[8]

CHART 2: WESTERN AUSTRALIA'S MERCHANDISE EXPORTS AS A SHARE OF THE NATION'S IN 2023-24; FOB VALUE



Source: Australian Bureau of Statistics

The introduction of the hard cap has created an emissions budget, in which all future projects are at risk of not proceeding should their expected net emissions be higher than the total baseline emission level.

This will empower the federal government to decide which emission heavy projects can go ahead, and fit within the Safeguard Mechanism, and which cannot proceed at all. This targets Australia's export industries, and in doing so targets WA's industries more than any other states.

8 Ibid.

The hard cap will lower nationwide safeguard emissions from the original 140 million tonnes to a maximum of 100 million tonnes by the end of the decade.[9] WA safeguard emissions accounted for approximately 35 per cent of the national total when the SM was amended in 2023.[10]

If WA still accounts for 35 per cent of the total national safeguard emission budget by the end of the decade, it will have to remove approximately 13 million tonnes of emissions from the economy. This is the equivalent to halting the operations of 80 per cent WA's original safeguard facilities.[11]

The emission reductions which will be required under the hard cap will have to largely come from gas power plants and LNG extraction for export, or iron ore mines—the kinds of projects that produce the goods that Australia, and in particular Western Australia, exports in significant amounts.

The burden on WA is illustrated in the safeguard mechanism emissions data for 2023-24, which reveal that emissions from Western Australian facilities were in aggregate below their baseline.[12] But because Western Australia accounts for the most emissions of any state (35 per cent of all covered emissions nationwide) it will bear the burden of reducing emissions further so as to enable the country to not exceed the national emissions budget.

TABLE 3: BASELINE AND COVERED SAFEGUARD EMISSIONS (CO_2-E) BY STATE; 2023-24

STATE OR TERRITORY OF OPERATION	BASELINE CO_2-E (TONNES)	COVERED CO_2-E (TONNES)	DIFFERENCE	% OF NATIONAL CO_2-E (TONNES)
NSW	22,353,789	22,383,029	29,240	16.4%
NT	8,494,508	7,931,088	-563,420	5.8%
QLD	37,240,915	37,532,893	291,978	27.5%
SA	5,230,578	5,497,064	266,486	4.0%
TAS	1,929,219	1,935,191	5,972	1.4%
VIC	5,041,574	5,204,177	162,603	3.8%
WA	48,802,224	48,030,745	-771,479	35.1%
Other	8,189,207	8,235,691	46,484	6%
Australia	137,282,014	136,749,878	-532,136	

Source: Clean Energy Regulator

9 Safeguard Mechanism (Crediting) Amendment Bill 2023.

10 Clean Energy Regulator, "The Safeguard Mechanism," (2021-22 dataset) https://www.cleanenergyregulator.gov.au/NGER/The-safeguard-mechanism.

11 Ibid.

12 Clean Energy Regulator, "The Safeguard Mechanism," (2023-24 dataset) https://www.cleanenergyregulator.gov.au/NGER/The-safeguard-mechanism.

Safeguard Australian exporters from net zero

With the election of Donald Trump as President of the United States, and the tariffs his administration has imposed, we must safeguard our export industries. We as a nation cannot control the tariffs placed on us or the tariffs placed on a trading partner and the associated costs that come with it, but we can control how we regulate the industries that generate that international trade.

If it is inevitable that we will have to incur a cost, either directly through tariffs on our products, or indirectly due to tariffs on products exported by other nations but which use our products as a primary input in their production, we need to offset those costs elsewhere.

This is why it is critical the government lift the regulatory burden it has placed on Australia's exporters in primary industries and manufacturing. Abandoning the target of net zero and its associated legislative schemes, such as the Safeguard Mechanism, will provide certainty for investors and project proponents, and simplify navigation of any global trade uncertainty.

APPENDIX:

2023-24 Safeguard Facilities by state; export status

FACILITY	RESPONSIBLE EMITTER	LOCATION	STATUS
Aurizon National Transport Facility	AURIZON OPERATIONS LIMITED	National	Non-export
Pacific National National Transport Facility	PACIFIC NATIONAL PTY LTD	National	Non-export
Qantas Airways Limited National Transport Facility	QANTAS AIRWAYS LIMITED	National	Non-export
Virgin Australia Holdings National Transport Facility	VIRGIN AUSTRALIA HOLDINGS LIMITED	National	Non-export
Solid Waste Services - Lucas Heights	CLEANAWAY WASTE MANAGEMENT LIMITED	NSW	Non-export
APN01 Appin Colliery - ICH Facility	ENDEAVOUR COAL PTY LIMITED	NSW	Export
Ashton Coal Mine (Underground)	ASHTON COAL OPERATIONS PTY LIMITED	NSW	Export
Bengalla Operations	BENGALLA MINING COMPANY PTY LIMITED	NSW	Export
Boggabri Coal Minesite	BOGGABRI COAL PTY LIMITED	NSW	Export
Bulga Coal Complex	BULGA COAL MANAGEMENT PTY LIMITED	NSW	Export
CEM NSW Berrima	BORAL LIMITED	NSW	Export
Chain Valley Colliery	DELTA ELECTRICITY PTY LTD	NSW	Export
Cowal Operations	EVOLUTION MINING (COWAL) PTY LIMITED	NSW	Export
DEN01	DENDROBIUM COAL PTY LTD	NSW	Export
Hunter Valley Operations mine	HV OPERATIONS PTY LTD	NSW	Export
HVY01 Hunter Valley Energy Coal - CCL Facility	HUNTER VALLEY ENERGY COAL PTY LTD	NSW	Export
Integra Underground Mine	HV COKING COAL PTY LIMITED	NSW	Non-operational
JGN	JEMENA GAS NETWORKS (NSW) LTD	NSW	Non-export
Kooragang Island	ORICA AUSTRALIA PTY LTD	NSW	Export
Mandalong Mine	CENTENNIAL MANDALONG PTY LIMITED	NSW	Export
Mangoola	MANGOOLA COAL OPERATIONS PTY LIMITED	NSW	Export
Maules Creek Open Cut Mine	MAULES CREEK COAL PTY LTD	NSW	Export
Metropolitan Colliery	METROPOLITAN COLLIERIES PTY. LTD.	NSW	Export
Moolarben Coal Mine (Open Cut & Underground)	MOOLARBEN COAL OPERATIONS PTY LTD	NSW	Export
Mount Pleasant Operations	MACH ENERGY AUSTRALIA PTY LTD	NSW	Export
Mt Owen Glendell Complex	MT OWEN PTY LIMITED	NSW	Export
Myuna Colliery	CENTENNIAL MYUNA PTY LIMITED	NSW	Export
Narrabri Underground Mine	NARRABRI COAL OPERATIONS PTY LTD	NSW	Export
Nowra Plant	SHOALHAVEN STARCHES PTY LTD	NSW	Export
Port Kembla Steelworks	BLUESCOPE STEEL (AIS) PTY. LTD.	NSW	Export

FACILITY	RESPONSIBLE EMITTER	LOCATION	STATUS
Ravensworth Operations	RAVENSWORTH OPERATIONS PTY LIMITED	NSW	Export
Russell Vale Colliery	WOLLONGONG RESOURCES PTY. LTD.	NSW	Non-operational
TAHMOOR COAL MINE	TAHMOOR COAL PTY LTD	NSW	Export
Tomago Aluminium Smelter	TOMAGO ALUMINIUM COMPANY PTY LTD	NSW	Export
United Coal Mine	UNITED COLLIERIES PTY LTD	NSW	Export
Wambo Coal Mine	WAMBO COAL PTY LIMITED	NSW	Export
Warkworth Mine	WARKWORTH MINING LTD	NSW	Export
Wilpinjong Coal Mine	WILPINJONG COAL PTY LTD	NSW	Export
EGP	JEMENA EASTERN GAS PIPELINE (1) PTY LTD	NSW; VIC	Non-export
Darwin LNG Plant	SANTOS LIMITED	NT	Export
GEM01	GROOTE EYLANDT MINING COMPANY PROPRIETARY LIMITED	NT	Export
Gove Operations	RTA GOVE PTY LIMITED	NT	Export
McArthur River Mine Operations	MCARTHUR RIVER MINING PTY. LTD.	NT	Export
McArthur River Power Station	EDL NGD (NT) PTY LTD	NT	Non-export
Montara Operations	JADESTONE ENERGY (EAGLE) PTY LTD	NT	Export
Newmont Tanami Operation	NEWMONT TANAMI PTY LTD	NT	Export
Ranger Mine	ENERGY RESOURCES OF AUSTRALIA LTD.	NT	Non-operational
Start up and Operations of the Ichthys LNG Project	INPEX OPERATIONS AUSTRALIA PTY LTD	NT	Export
APLNG Facility	CONOCOPHILLIPS AUSTRALIA OPERATIONS PTY LTD	QLD	Export
Arcadia	SANTOS LTD	QLD	Export
Arrow Surat Operations	ARROW ENERGY HOLDINGS PTY LTD	QLD	Export
Ballera	SANTOS LIMITED	QLD	Export
Baralaba Coal Mine	BARALABA COAL COMPANY PTY LTD	QLD	Export
Batchfire Resources No.1	BATCHFIRE RESOURCES PTY LTD	QLD	Export
Blackwater Mine	BM ALLIANCE COAL OPERATIONS PTY LIMITED	QLD	Export
Blackwater Mine	WHITEHAVEN BLACKWATER PTY LTD	QLD	Export
Boyne Smelters Limited	RIO TINTO ALUMINIUM LIMITED	QLD	Export
Burton Complex	BOWEN COKING COAL LIMITED	QLD	Export
Byerwen Mine	BYERWEN COAL PTY LTD	QLD	Temporarily suspended operations
CAN01	SOUTH32 CANNINGTON PROPRIETARY LIMITED	QLD	Export
Capcoal Mine	ANGLO COAL (CAPCOAL MANAGEMENT) PTY LIMITED	QLD	Export
Carborough Downs Coal Mine	FITZROY (CQ) PTY LTD	QLD	Export

FACILITY	RESPONSIBLE EMITTER	LOCATION	STATUS
Carmichael Coal Mine	ADANI MINING PTY LTD	QLD	Export
Caval Ridge Mine	BM ALLIANCE COAL OPERATIONS PTY LIMITED	QLD	Export
Centurion Coal Mine	CENTURION COAL MINING PTY LTD	QLD	Export
Clermont Coal Operations	CLERMONT COAL OPERATIONS PTY LIMITED	QLD	Export
Collinsville Mine	NC COAL COMPANY PTY LIMITED	QLD	Export
Condabri Talinga Orana	ORIGIN ENERGY UPSTREAM OPERATOR PTY LTD	QLD	Export
Cook Colliery	CONSTELLATION MINING PTY LTD	QLD	Export
Coppabella Coal Mine	PEABODY ENERGY AUSTRALIA PCI (C&M MANAGEMENT) PTY LTD	QLD	Export
Curragh Mine	CORONADO AUSTRALIA HOLDINGS PTY LTD	QLD	Export
Curtis Island GLNG Plant	SANTOS LIMITED	QLD	Export
Daunia Mine	BM ALLIANCE COAL OPERATIONS PTY LIMITED	QLD	Export
Daunia Mine	WHITEHAVEN DAUNIA PTY LTD	QLD	Export
Dawson Mine	ANGLO COAL (DAWSON MANAGEMENT) PTY LTD	QLD	Export
Drake Mine	DRAKE MINE MANAGEMENT PTY LTD	QLD	Export
Ensham Resources Minesite	ENSHAM RESOURCES PTY. LIMITED	QLD	Export
Fairview	SANTOS LIMITED	QLD	Export
Fisherman's Landing	CEMENT AUSTRALIA (QUEENSLAND) PTY LIMITED	QLD	Export
Foxleigh Mine	FOXLEIGH MANAGEMENT PTY LTD	QLD	Export
Gibson Island	INCITEC PIVOT LIMITED	QLD	Non-operational
Goonyella Broadmeadow Mine	BM ALLIANCE COAL OPERATIONS PTY LIMITED	QLD	Export
Grosvenor Mine	ANGLO COAL (MORANBAH NORTH MANAGEMENT) PTY LIMITED	QLD	Suspended operations
Hail Creek Mine	HAIL CREEK COAL PTY LTD	QLD	Export
Ironbark No.1	FITZROY (CQ) PTY LTD	QLD	Export
Isaac Plains Coal Mine	STANMORE IP COAL PTY LTD	QLD	Export
Jax Mine	JAX COAL PTY LTD	QLD	Export
Jellinbah Mine	JELLINBAH MINING PTY LTD	QLD	Export
Kestrel Coal Pty Ltd	KESTREL COAL GROUP PTY LTD	QLD	Export
Kogan Creek Mine	GOLDING CONTRACTORS PTY LTD	QLD	Non-export
Lake Vermont Mine	THIESS PTY LTD	QLD	Export
Middlemount Coal Mine	MIDDLEMOUNT COAL PTY LTD	QLD	Export
Moorvale Coal Mine	PEABODY ENERGY AUSTRALIA PCI (C&M MANAGEMENT) PTY LTD	QLD	Export
Moranbah	INCITEC PIVOT LIMITED	QLD	Export
Moranbah North Mine	ANGLO COAL (MORANBAH NORTH MANAGEMENT) PTY LIMITED	QLD	Export
Mount Isa Mines Copper and Zinc Operations	MOUNT ISA MINES LIMITED	QLD	Export
Norwich Park Mine	BM ALLIANCE COAL OPERATIONS PTY LIMITED	QLD	Non-operational
Oaky Creek Coal Complex	OAKY CREEK HOLDINGS PTY LIMITED	QLD	Export

FACILITY	RESPONSIBLE EMITTER	LOCATION	STATUS
Olive Downs Complex	PEMBROKE RESOURCES NOMINEE PTY LTD	QLD	Export
Parkhurst Magnesia Manufacturing Plant	QMAG PTY LIMITED	QLD	Export
Peak Downs Mine	BM ALLIANCE COAL OPERATIONS PTY LIMITED	QLD	Export
Phosphate Hill	INCITEC PIVOT LIMITED	QLD	Export
Poitrel Mine	STANMORE RESOURCES LIMITED	QLD	Export
QGC Upstream	QGC PTY LIMITED	QLD	Export
Queensland Alumina Limited Refinery	QUEENSLAND ALUMINA LIMITED	QLD	Export
Queensland Curtis LNG Plant	QCLNG OPERATING COMPANY PTY LTD	QLD	Export
Queensland Nitrates Ammonium Nitrate Plant	QUEENSLAND NITRATES PTY LTD	QLD	Non-export
Ravenswood Mine	RAVENSWOOD GOLD PTY LTD	QLD	Export
Refinery Qld Lytton	AMPOL LIMITED	QLD	Export
Rio Tinto Weipa	RTA WEIPA PTY LTD	QLD	Export
Rio Tinto Yarwun	RTA YARWUN PTY LTD	QLD	Export
Rolleston Coal Mine	ROLLESTON COAL HOLDINGS PTY LIMITED	QLD	Export
Roma Hub	SANTOS LIMITED	QLD	Export
Saraji Mine	BM ALLIANCE COAL OPERATIONS PTY LIMITED	QLD	Export
Sojitz Gregory Crinum Mine	SOJITZ DEVELOPMENT PTY LTD	QLD	Export
South Walker Creek	STANMORE RESOURCES LIMITED	QLD	Export
Spring Gully Reedy Creek Combabula	LATTICE ENERGY LIMITED	QLD	Export
Yarrabee Coal Mine (Open Cut)	YARRABEE COAL COMPANY PTY. LTD.	QLD	Export
Yarwun Nitrates	ORICA AUSTRALIA PTY LTD	QLD	Export
South West Queensland Pipeline	APA (SWQP) PTY LIMITED	QLD; SA	Non-export
Angaston Operations	ADBRI LIMITED	SA	Export
Birkenhead Operations	ADBRI LIMITED	SA	Export
Liberty Primary Steel Whyalla Steelworks	ONESTEEL MANUFACTURING PTY LIMITED	SA	Export
Millicent Mill	KIMBERLY-CLARK AUSTRALIA PTY. LIMITED	SA	Export
Moomba Plant	SANTOS LIMITED	SA	Export
Nyrstar Port Pirie Facility	NYRSTAR PORT PIRIE PTY LTD	SA	Export
ODS01 Olympic Dam – UOD Facility	BHP OLYMPIC DAM CORPORATION PTY LTD	SA	Export
Orora Glass Plant Gawler	ORORA LIMITED	SA	Export
Port Bonython Plant	SANTOS LIMITED	SA	Export
SIMEC Mining - Middleback Range Iron Ore Mine (Whyalla)	ONESTEEL MANUFACTURING PTY LIMITED	SA	Export
Bell Bay Smelter	RIO TINTO ALUMINIUM (BELL BAY) LIMITED	TAS	Export
Liberty Bell Bay	LIBERTY BELL BAY PTY LTD	TAS	Export

FACILITY	RESPONSIBLE EMITTER	LOCATION	STATUS
Norske Skog Boyer Mill	NORSKE SKOG PAPER MILLS (AUSTRALIA) LIMITED	TAS	Export
Port Latta Pelletising Plant	GRANGE RESOURCES (TASMANIA) PTY LTD	TAS	Export
Railton	CEMENT AUSTRALIA (GOLIATH) PTY LIMITED	TAS	Export
Savage River Mine	GRANGE RESOURCES (TASMANIA) PTY LTD	TAS	Export
1. Solid Waste Services - MRL	CLEANAWAY WASTE MANAGEMENT LIMITED	VIC	Non-export
AusNet Gas Services Pty Ltd	AUSNET SERVICES HOLDINGS PTY LTD	VIC	Non-export
Australian Gas Networks (Vic) Pty Ltd	AUSTRALIAN GAS NETWORKS HOLDING PTY LTD	VIC	Non-export
Dandenong	OCEANIA GLASS PTY LTD	VIC	Export
Geelong Refinery	VIVA ENERGY REFINING PTY LTD	VIC	Export
Gippsland Basin facility	ESSO AUSTRALIA RESOURCES PTY LTD	VIC	Export
InfraBuild Steel Laverton Steel Mill	THE AUSTRALIAN STEEL COMPANY (OPERATIONS) PTY LTD	VIC	Export
Mobil Altona Refinery	MOBIL REFINING AUSTRALIA PTY. LTD.	VIC	Non-operational
Multinet Principal Distribution Network and South Gippsland Pipeline	MULTINET GAS (DB NO. 2) PTY LTD	VIC	Non-export
Opal Australian Paper Maryvale Mill	PAPER AUSTRALIA PTY LTD	VIC	At risk
Otway	BEACH ENERGY (OPERATIONS) LIMITED	VIC	Non-export
Portland Aluminium Smelter	ALCOA PORTLAND ALUMINIUM PROPRIETARY LIMITED	VIC	Export
Qenos Altona Manufacturing	QENOS PTY LTD	VIC	Closing down
Sewerage West	MELBOURNE WATER CORPORATION	VIC	Non-export
TT-Line - Victorian Operation	TT-LINE COMPANY PTY. LTD.	VIC	Non-export
V/Line	V/LINE CORPORATION	VIC	Non-export
Western Port Works	BLUESCOPE STEEL LIMITED	VIC	Export
APU01 Pyrenees - AOA Facility	WOODSIDE ENERGY GLOBAL PTY LTD	WA	Export
ARC01 Mining Area C - MNG Facility	BHP IRON ORE PTY LTD	WA	Export
Beharra Springs	BEACH ENERGY (OPERATIONS) LIMITED	WA	Non-export
Brockman 2 / Nammuldi Mines	HAMERSLEY IRON PTY. LIMITED	WA	Export
Brockman 4 Mine	HAMERSLEY IRON PTY. LIMITED	WA	Export
Carosue Dam Operations	NORTHERN STAR (CAROSUE DAM) PTY LTD	WA	Export
Chandala Processing Plant	TIWEST PTY LTD	WA	Export
Christmas Creek Mine	CHICHESTER METALS PTY LTD	WA	Export
Cloudbreak Mine	CHICHESTER METALS PTY LTD	WA	Export
Cockburn Operations	ADBRI LIMITED	WA	Export
CSBP Kwinana Facility	CSBP LIMITED	WA	Export
CTC WA Facility	CENTURION TRANSPORT CO. PTY LTD	WA	Non-export
DBNGP	DBNGP (WA) TRANSMISSION PTY LIMITED	WA	Non-export

FACILITY	RESPONSIBLE EMITTER	LOCATION	STATUS
Dongara Operations	ADBRI LIMITED	WA	Export
Duketon South Operations	REGIS RESOURCES LIMITED	WA	Export
Eliwana Mine	FMG SOLOMON PTY LTD	WA	Export
Fimiston Operations	KALGOORLIE CONSOLIDATED GOLD MINES PTY LTD	WA	Export
FLNG	SHELL AUSTRALIA PTY LTD	WA	Export
Goldfields Gas Transmission Pipeline	GOLDFIELDS GAS TRANSMISSION PTY LTD	WA	Non-export
Gorgon Operations	CHEVRON AUSTRALIA PTY LTD	WA	Export
Granny Smith Mine Site	GSM MINING COMPANY PTY LTD	WA	Export
Greenbushes Lithium Operation	TALISON LITHIUM AUSTRALIA PTY LTD	WA	Export
Gruyere Mine Site	GRUYERE MINING COMPANY PTY LTD	WA	Export
Gudai-Darri Mine	MOUNT BRUCE MINING PTY LTD	WA	Export
Hope Downs 1 Mine	HAMERSLEY HMS PTY LTD	WA	Export
Hope Downs 4 Mine	HAMERSLEY HMS PTY LTD	WA	Export
Iron Bridge Mine	IB OPERATIONS PTY LTD	WA	Export
Jimblebar Mine	BHP IRON ORE PTY LTD	WA	Export
Jundee Gold Mine	NORTHERN STAR RESOURCES LIMITED	WA	Export
Kemerton Silicon Smelter	SIMCOA OPERATIONS PTY. LTD.	WA	Export
King of the Hills	GREENSTONE RESOURCES (WA) PTY LTD	WA	Export
Koolyanobbing Iron Ore Operations	YILGARN IRON PTY LTD	WA	Export
Kwinana Alumina Refinery	ALCOA OF AUSTRALIA LIMITED	WA	Non-export
Kwinana Pigment Plant	TRONOX MANAGEMENT PTY LTD	WA	Export
Leinster Power Station	TEC DESERT PTY LTD	WA	Non-export
Marandoo Mine	HAMERSLEY IRON PTY. LIMITED	WA	Export
Mesa A Mine	ROBE RIVER MINING CO. PTY. LTD.	WA	Export
Mesa J / K Mine	ROBE RIVER MINING CO. PTY. LTD.	WA	Export
Mt Keith Power Station	TEC DESERT PTY LTD	WA	Non-export
Mt Marion Lithium Project	REED INDUSTRIAL MINERALS PTY LTD	WA	Export
Murrin Murrin Operations	MURRIN MURRIN OPERATIONS PTY LTD	WA	Export
Newman Operations	BHP IRON ORE PTY LTD	WA	Export
Newman Power Station	ALINTA ENERGY TRANSMISSION (ROY HILL) PTY LTD	WA	Non-export
Newmont Boddington Gold Operation	NEWMONT BODDINGTON PTY LTD	WA	Export
Ningaloo Vision FPSO	SANTOS LIMITED	WA	Being progessively decommissioned
NKS01 Nickel West Kalgoorlie Facility	BHP NICKEL WEST PTY LTD	WA	Non-operational
NKW01 Nickel West Kwinana Facility	BHP NICKEL WEST PTY LTD	WA	Non-operational
NMK01 Nickel West Mt Keith Facility	BHP NICKEL WEST PTY LTD	WA	Non-operational
North West Shelf Project	WOODSIDE ENERGY LTD.	WA	Export

FACILITY	RESPONSIBLE EMITTER	LOCATION	STATUS
Paraburdoo Mine	HAMERSLEY IRON PTY. LIMITED	WA	Export
Pilbara Rail Operations	PILBARA IRON PTY LTD	WA	Non-export
Pilgangoora Operations	PILBARA MINERALS LIMITED	WA	Export
Pinjarra Alumina Refinery	ALCOA OF AUSTRALIA LIMITED	WA	Export
Pluto LNG	WOODSIDE BURRUP PTY. LTD.	WA	Export
Premier Coal Mine (Open Cut)	PREMIER COAL LTD	WA	Export
PRL03 Rail - IOR Facility	BHP IRON ORE PTY LTD	WA	Non-export
Rail	THE PILBARA INFRASTRUCTURE PTY LTD	WA	Non-export
Ravensthorpe Nickel Operation	FQM AUSTRALIA NICKEL PTY LTD	WA	Export
Roy Hill Mine	ROY HILL HOLDINGS PTY LTD	WA	Export
Sino Iron Project – Cape Preston	CITIC PACIFIC MINING MANAGEMENT PTY LTD	WA	Export
Solomon Mine	FMG SOLOMON PTY LTD	WA	Export
Solomon Power Station	FMG SOLOMON PTY LTD	WA	Non-export
South West Synthetic Rutile Operations	ILUKA RESOURCES LIMITED	WA	Export
Sunrise Dam	ANGLOGOLD ASHANTI AUSTRALIA LIMITED	WA	Export
Telfer Gold Mine	NEWCREST MINING LIMITED	WA	Export
Thunderbox Operations	NORTHERN STAR (THUNDERBOX) PTY LTD	WA	Export
Tom Price Mine / WTS	HAMERSLEY IRON PTY. LIMITED	WA	Export
Tropicana Gold Mine	ANGLOGOLD ASHANTI AUSTRALIA LIMITED	WA	Export
Varanus Hub	SANTOS LIMITED	WA	Export
Vincent Project Venture	WOODSIDE ENERGY LTD.	WA	Export
Wagerup Alumina Refinery	ALCOA OF AUSTRALIA LIMITED	WA	Export
West Angelas Mine	ROBE RIVER MINING CO. PTY. LTD.	WA	Export
Western Australia	ALLIANCE AVIATION SERVICES LIMITED	WA	Non-export
Wheatstone Operations	CHEVRON AUSTRALIA PTY LTD	WA	Export
Wodgina Operations	MARBL LITHIUM OPERATIONS PTY LTD	WA	Export
WOR01	SOUTH32 WORSLEY ALUMINA PTY LTD	WA	Export
YAN01 Yandi/Marillana Creek Mine - MNG Facility	BHP IRON ORE PTY LTD	WA	Export
Yandicoogina Mine	HAMERSLEY IRON - YANDI PTY LIMITED	WA	Export
Yarnima Power Station	BHP IRON ORE PTY LTD	WA	Non-export
YPF AMMONIA PLANT	YARA PILBARA FERTILISERS PTY LTD	WA	Export

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About the author

Adam Creighton is an award-winning journalist who holds a Bachelor of Economics with First Class Honours from the University of New South Wales, and Master of Philosophy in Economics from Balliol College, Oxford. Having started his career at the Reserve Bank of Australia, Adam has been at the forefront of economic debate having written for The Economist and The Wall Street Journal, as well as The Australian as Economics Editor and Washington correspondent.

Saxon Davidson is a Research Fellow at the IPA. He feels most strongly about liberty, freedom of speech and the Australian way of life, and how these values have declined rapidly due to government policies during the Covid-19 pandemic. Saxon has a Bachelor of Arts from the University of Melbourne, majoring in politics.

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