



Level 3, 155 Queen Street  
Brisbane QLD 4000  
Australia

[cleangascouncil.org](http://cleangascouncil.org)

RET and Energy Section  
Clean Energy Regulator  
GPO Box 621  
Canberra ACT 2601

Via email: [CER-RETandEnergySection@cleanenergyregulator.gov.au](mailto:CER-RETandEnergySection@cleanenergyregulator.gov.au)  
Cc: David Parker

17 March 2021

Dear Sir/madam

**RE: The Corporate Emissions Reduction Transparency report (CERT)**

We thank you for the opportunity to comment on the proposed design and implementation of the CERT and we welcome any work that will increase consistency and transparency in tracking progress towards meeting net zero emissions targets.

The Clean Gas Council is currently using the National Greenhouse and Energy Reporting (NGER) scheme as the basis for our Australian Clean Gas Pilot, working with the information that is publicly available, as well as data provided direct by our members at a more granular level. We also use other data sources such as large-scale generation certificates (LGCs), Australian carbon credit units (ACCUs), Certified Emissions Reductions (CERs), Verified Carbon Units (VCUs) and Voluntary Emissions Reduction units (VERs) in our calculation of net emissions.

The Clean Gas Council's focus is the reporting of emissions associated with the extraction, processing and transportation of natural gas. We aim to support consumers and producers reduce these emissions as we work towards net zero emission gas production.

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Our members acknowledge that not all gas is equal when it comes to emissions and are actively taking steps to become less emissions intensive. They also recognise that transparent publication of emissions information encourages targeting of capital expenditure within the gas industry and ultimately leads to better, more informed consumer choices.

The Clean Gas Council is an important source of information for buyers of Australian gas, both domestically and internationally, who are seeking to manage their own emissions profile.

Given our activity, it should be no surprise that we commend the Clean Energy Regulator for pursuing the CERT, as it appears to have similar objectives to our own. We support the additional reporting and are encouraged by the objectives. However, delivering this information in an annual ledger showing reported scope 1 and scope 2 emissions, eligible units and certificates surrendered, and the 'net' scope 1 and 2 positions still requires users to have analysis skills to understand an organisation's claims of action and ambition to reduce their emissions or source renewable electricity.

We believe that it is essential that emissions data is presented in an easy to understand format using non-technical language to reach wider audiences and facilitate better decision making. We encourage the CER to design the CERT from the user's perspective so that individual users can readily navigate the complexity that is emissions reporting.

We would welcome the opportunity to work with the CER on this user experience, system design and ultimately the reporting of the data.

Yours sincerely

*Gregory B Denton*

Greg Denton

**Co-founder and Chairman**

M: +61 499 804 196

*Helen Gough*

Helen Gough (Mar 17, 2021 13:17 GMT+10)

Helen Gough

**Co-founder and CEO**

M: +61 456 081 099

# CGC202103 - CER Letter - Corporate Emissions Reduction Transparency

Final Audit Report

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