

Wilmar Sugar Australia Limited

Clean Energy Regulator
Department of Industry, Science, Energy and Resources
GPO Box 621
Canberra ACT 2601

Submitted by email: CER-RETandEnergySection@cleanenergyregulator.gov.au.

Subject: *Feedback on Corporate Emissions Reduction Transparency (CERT) reporting and its draft guidelines*

Introduction

Thank you for the opportunity to provide comment on the new initiative – the Corporate Emissions Reduction Transparency report (CERT).

The general principle of the proposed approach: to allow for companies to show how they are reducing their net emissions while supporting the growth of a vibrant carbon market is reasonable and logical.

The utilisation of the NGER scheme as the basis for this reporting is a sound approach and reduces administrative burden on corporations when reporting.

Comments on the Guidance

Wilmar Sugar Australia seeks further clarification from the Regulator on the following:

- Wilmar Sugar Australia is a diverse business with operations in agriculture, milling, refining and distilling. Currently, Wilmar Australia Holdings (WAH) reports under NGER as the controlling entity of a corporation comprising a number of production facilities and two key companies - Sugar Australia Pty Limited and Wilmar Sugar Pty Ltd. Our various operations have different operating targets and measures. Therefore, reporting a single target for WAH would not be accurate, and so we would like to know if the CER will provide flexibility in the reporting matrix to allow for such corporate structures?
- How will the proposed reportable metrics and targets take into account changes in production? For example, if we have a bigger harvest than the year before, then we produce more sugar, but also in the process produce more GHG emissions. In a year of poor harvest, the reverse might occur.
- We produce a lot of LGCs, however we do not surrender them, we sell them under a PPA. Would CERT reporting be more accurate if it showed LGCs produced and LGCs surrendered? Splitting these two would avoid double counting for those parties reporting the surrendering of the units only.
- The proposed column (col 15) stating “Renewable Energy as a percentage of total electricity consumed” is confusing. Does this refer to electricity from eligible renewable energy sources consumed as a percentage of total electricity consumed?

Conclusion

Thank you for the opportunity to provide input. Wilmar Sugar Australia welcomes ongoing engagement with the Regulator. We also support the submission from AIGN on the feedback of this proposal and have engaged with them on this matter. Please feel free to contact Josephine Gualtieri (Group EHS Business Partner), with any further questions regarding this submission (Josephine.Gualtieri@au.wilmar-intl.com).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Josephine Gualtieri'.

Josephine Gualtieri
Group EHS Business Partner
Wilmar Sugar Australia