

29 October 2021

General Manager
Clean Energy Regulator
GPO Box 621
CANBERRA ACT 2601
By e mail: CER-Cert@cer.gov.au

**RE: Submission on Corporate Emissions Reduction Transparency Report
Consultation Paper**

Thank you for the opportunity to comment on this consultation paper.

The Water Corporation of Western Australia (the Corporation) is a State Government owned entity responsible for providing water, wastewater and drainage services to a significant proportion of the Western Australian population, with services located across the State. Our greenhouse emissions are of the order of 750,000 tonnes of CO₂e per year, 90% of which are Scope 2 emissions from electricity use, and of that well over half our electricity use relates to two seawater desalination plants providing potable water to the south west of the State, including the Perth metropolitan area.

The Corporation supports the paper's objective of providing clarity and consistency for corporate reporting of emissions, particularly with the significant increase in corporate carbon emission targets being announced regularly in many sectors of the economy. The Corporation's own target is net zero carbon emissions by 2050 (to match the State Government's target) with another commitment that our next major water source (potentially another metropolitan seawater desalination plant) will be net zero carbon emissions from commissioning onwards.

The Corporation has reviewed the proposals in the consultation paper and generally finds them to be both reasonable, and capable of providing the necessary structures to ensure corporate emission reporting is consistent and understandable across the economy. The flexibility offered for entities to develop their own targets and commitments is in our view necessary to deal with different circumstances across the country.

The proposed arrangements for Scope 2 emissions accounting and the capacity to report offsets generated from LGCs sourced from renewable power generators under both location and market based methods are also supported, particularly the capacity to nominate which Scope 2 accounting approach an entity wishes to use.

Thank you again for the opportunity to comment on this proposal. Should you wish to clarify any of these comments I can be contacted by phone on 08 9420 2038 or by e mail at digby.short@watercorporation.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Digby Short", with a long horizontal line extending to the right.

Dr Digby Short

Manager, Environment

WA Water Corporation