

9 June, 2005



Director
Energy Market Policy Team
Australian Greenhouse Office
Department of Environment and Heritage
GPO Box 787
CANBERRA ACT 2601

ABN: 16 549 616 697
Suite 5 / 18 Stirling Street
PO Box 8078
PERTH BC 6849
Phone: (08) 9328 8411
Fax: (08) 9328 8933

Re: Greenhouse and Energy Reporting Consultation Paper.

The Western Australian Sustainable Energy Association (WA SEA) Inc. welcomes the opportunity to comment on the Greenhouse and Energy Reporting Consultation Paper drafted by the Australian Greenhouse Office.

WA SEA Inc. is the peak body of the Western Australian sustainable energy industry. The Association promotes the development and adoption of sustainable energy technologies and practices that minimise and/or displace fossil fuel use. The Association has over 60 individual and company members representing a broad spectrum of the sustainable energy industry.

The Association supports the development of a nationally consistent framework for greenhouse and energy reporting. The Association strongly recommends that the framework is developed with the potential for a future mandatory national and international carbon trading scheme in mind and as such needs to encompass the following key elements:

- Mandatory Reporting for all large greenhouse gas emitters - to provide information for markets and to ensure that all companies face a level playing field in terms of costs of reporting. A suitable company threshold for reporting could be around 50 000 tonnes CO₂e per annum. Voluntary schemes will always not capture all liable parties,
- Streamlined - reporting required is consistent with other International Reporting requirements of organisations.
- Centralised - this reporting requirement will supersede existing reporting obligations of organisations at a state and federal level, although would allow all jurisdictions to access information as appropriate.
- Flexible - organisations can select if the reporting occurs during a Calendar year or Financial year

Mission:

'On behalf of the people of Western Australia, the Association will vigorously promote the development and adoption of sustainable energy so that by the end of this decade, 30% of the State's fossil fuel use is displaced by sustainable energy practices.'

- Web based – organisations complete the reporting requirements via the internet where data can be amended and saved. Essential that a sophisticated help facility is available.
- Purpose Built – the framework should be a new purpose built platform which will undergo rigorous testing by a number of organisations prior to implementation.

The Association also recommends that the data collected from organisation's are aggregated and is reported on a company 'division' basis.

The Association strongly supports the development of a Mandatory reporting procedure. If you require any further information, please do not hesitate to contact Johanna Gastevich on (08) 9328 8411.

Yours sincerely



Matthew Rosser
Chair
Western Australian Sustainable Energy Association (WA SEA) Inc.

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