

## **Comments on National Greenhouse and Energy Reporting System Regulations Discussion Paper**

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Emailed: 15/11/07

Dear Sir/Madam

I have recently reviewed the aforementioned document on behalf of Ports Corporation of Queensland (PCQ).

At this stage, my only comments are that it is still unclear as to who reports greenhouse information when contractors are involved. From the discussion paper, it appears that a registered corporation can be exempt from reporting some information if it deems that the information is to be provided by someone else (i.e. contractor). However, this only appears to apply if the contractor refuses to provide the necessary information for commercially sensitive reasons.

It is a common situation for a registered corporation to engage a contractor to undertake a majority of its work which produces greenhouse gas emissions. An example of this is that PCQ as a port authority will engage a contractor to undertake dredging works in various ports. It is unclear in this situation, if PCQ or the dredging organisation (who own the plant and technically generate the emission) would be required to report information if it exceeded the specified thresholds. The situation may arise therefore, that both organisations will report the information if it is not clear whose role it is to do so. It would be useful if this scenario be considered by the DEW in developing the greenhouse gas and energy reporting system legislation framework to provide clarification on who is required to report the information.

PCQ would like to continue being updated on the progression of the legislative framework for national greenhouse and energy reporting system.

Regards

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