



**Submission to Greenhouse and Energy Reporting Taskforce**

**National Greenhouse and Energy Reporting System  
Regulation Design Issues**

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16 November, 2007

Re: National Greenhouse and Energy Reporting System – Regulation Design Issues

Dear Sir/Madam,

Broadcast Australia provides fully managed transmission services for both analogue and digital television and analogue radio (including AM, FM and HF radio services) to its major customers: the Australian Broadcasting Corporation (ABC) and Special Broadcasting Service (SBS). Broadcast Australia also provides portal services and site sharing arrangements for commercial and community television and radio broadcasters and co-hosting at Broadcast Australia sites for telecommunications and emergency service providers.

Our network covers approximately 580 transmission sites strategically located throughout the metropolitan, regional and rural areas of Australia. Over 1600 television and radio transmitters, and many more telecommunications services, operate from these sites.

The Broadcast Australia Group of companies is comprised of Broadcast Australia and its wholly owned subsidiary The Bridge Networks. Broadcast Australia is a 100% owned subsidiary of [Macquarie Communications Infrastructure Group](#) (MCIG), an entity listed on the Australian Stock Exchange (ASX: [MCG](#)). Broadcast Australia owns 100% of [The Bridge Networks](#).

MCIG is registered under the Energy Efficiency Opportunities Act 2006. In practice, the obligations of MCIG under the EEO Act will be completed by Broadcast Australia.

Broadcast Australia offers the following comments in relation to the Regulations discussion issues:

#### Streamlining

Broadcast Australia agrees that a single streamlined reporting system which imposes least cost and red tape burden is the preferable course of action. In support of this objective, the Act should replace the reporting requirements of the EEO Act in order to avoid inconsistencies and duplication.

In further support of this initiative, it is requested that the Department examine options to regulate for both the consistent reporting and electronic provision of energy and greenhouse data from energy retailers to their customers. Broadcast Australia would be pleased to discuss details in further consultation with the Department.

#### Energy

The broadcast and wireless communications industry generally, is in the business of converting energy – from electrical energy to electromagnetic fields. Further consultation regarding the definitions of energy consumption and production is required to ensure that these definitions are appropriate for all industry sectors.

## Industry Sectors and Facilities

As described above, Broadcast Australia's network comprises approximately 580 sites throughout Australia. Broadcast Australia supports the proposal to aggregate the data from small facilities to minimise the regulatory burden on the organisation.

It is noted that industries which have similar activities that often occur in tandem may not need to report to the ANZSIC Group (3 digit) level. In the broadcast transmission industry, the activities of Radio Broadcasting and Television Broadcasting often occur in tandem. Indeed, in the communications industry, activities from the Subdivisions of Broadcasting and Telecommunications also occur in tandem in small facilities. As some of these facilities are smaller (and use less energy) than the average home, it is not practical to separate energy data across these Groups or Subdivisions. As a minimum, to minimise regulatory burden, it is suggested that the ANZSIC Subdivision (2 digit) level is applied to the broadcasting sector. We suggest that further industry consultation is required on this design issue.

To avoid confusion and unnecessary administration, the definition of facility and subsequent reporting requirements should be consistent with the EEO Act and its requirements.

## Operational Control

The communications industry is one sector where further explanation of the definitions of operational control is required. Transmission sites are commercial facilities from which multiple parties undertake activities, however, the arrangements are often more complex than traditional commercial property facilities. Broadcast Australia would be interested in participating in further consultation regarding the issues of facilities and operational control.

## Reporting

Clarification of the requirements for energy consumption data will be necessary. For example, what measurement tools and what accuracy will be acceptable to meet requirements of the Act and other State and Commonwealth legislation? It is critical that energy and greenhouse data as supplied by energy retailers is deemed sufficient for the reporting purposes. The requirement for additional investment for data capture by the corporation should be avoided as this cost will outweigh any benefits on smaller facilities. It is important to ensure that industry consultation be undertaken in relation to the proposed measurement tools to ensure that they are practical across various industry sectors.

Installation of additional fuel consumption metering should not be required. Reporting of small quantities of engine fuel consumed by contractors may cause unnecessary administrative burden on small businesses. Regardless, discussion on the required measurement tools and data accuracy is desired.

Broadcast Australia would welcome the opportunity to provide further input to the regulation design in the future to ensure that the key goals of the reporting system are realised across all industry sectors.

Yours sincerely

Glenn Howlett

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Broadcast Australia