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Greenhouse & Energy Reporting Taskforce
Department of Climate Change
G.P.O. Box 854
Canberra ACT 2601

26 February 2008

Dear Sir / Madam,

Subject: Submission of View on National Greenhouse & Energy Reporting Act Regulations Policy Proposals

In response to the policy proposals set out in Sections 3 and 4.1.2 of the Regulations Policy Paper, regarding level of company information to be reported and published, we submit that there should be provision to be exempted from the requirement to report information on a subsidiary-by-subsiary basis, where it can be shown that provision of such information would not result in provision of useful information to the public and investors, the stated object of this requirement.

Alternatively, there should be provision to opt for reporting of information on a divisional / business unit basis, similar to segment reporting requirements in financial reporting, where an organisation assesses that provision of information in this form would provide more useful information to the public and investors.

The bases for our submission are that:

- (a) We believe reporting on a subsidiary-by-subsiary basis would create a significant additional reporting burden for our organisation, given the large number of subsidiaries and given also that our current internal reporting is on a divisional / business unit basis, rather than by subsidiary; AND
- (b) The nature of our operations is such that the public or investors would, in our view, derive no discernable benefit by the provision of our organisation's information on a subsidiary-by-subsiary basis.

We would be pleased to further discuss the issue with you and look forward to your response.

Yours faithfully,



Chris Warrell

General Manager Human Resources & Sustainability
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