



By Email: reporting@climatechange.gov.au

Dear Senator Wong,

Queensland Conservation (QCC) is the 'peak' environment organisation in Queensland, representing over 70 organisations engaged in environment and conservation issues.

QCC is writing to you to register our concerns on the CO₂ equivalence of methane contained in the *Technical Guidelines for the estimation of Greenhouse Emissions and Energy* and on the timetable and thresholds proposed for reporting in the *National Greenhouse and Energy Reporting System*.

1. We note that the IPCC 4th Assessment Report has calculated methane at 75 times the equivalence of CO₂. However, in the *Technical Guidelines*, released after Australia's signing of the Kyoto Protocol and after the release of the 4th Assessment Report, methane is calculated at only 21 times CO₂ equivalence. (*I refer you to Table 2 on page 20 of the guidelines*). The calculation used in the *Technical Guidelines* is based upon a now out-of-date IPCC assessment dating back to 1995.

This discrepancy has some significant ramifications for the accuracy of Australia's Emission Inventory, and for the mandatory reporting of emissions required under the National Greenhouse and Energy Reporting Act 2007.

We also note that the *Technical Guidelines* assume that these calculations will remain current for 5 years.

We are concerned that, unless this discrepancy is rectified, Australia's Emissions Inventory will remain inaccurate, emission reporting will be confused and significantly understated and the Federal Government's standing in international climate negotiations compromised.

This discrepancy will also undermine the proposed National Emissions Trading Scheme.

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We urge you to review the *Technical Guidelines* and rectify the discrepancy between IPCC calculations on methane CO2 equivalence and current Federal Government estimates.

2. In (Appendix A: Thresholds) it is currently planned to progressively phase in corporate reporting over three years. The timetable being:

- 125 KT for 2008-9
- 87.5 KT for 2009-10 and;
- 50 KT for 2010-11

This timetable and these thresholds simply act to delay the development of an accurate picture of Australian emissions. We need as a matter of urgency to build a comprehensive emissions profile.

QCC takes the view that the three year timeframe should be telescoped into one year, and a reporting threshold set at 25 KT CO2 equivalence.

The above changes will act to impress upon industry the importance of getting to grips with their carbon emissions and support an urgent catch-up agenda for a nation well behind others in its inventory reporting.

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