

## **National Greenhouse and Energy Reporting System**

Please find enclosed QAF's submission regarding the "Technical Guidelines for the estimation of greenhouse emissions and energy at facility level: Energy, Industrial Process and Waste Sectors in Australia Discussion Paper" (December 2007)".

### **OSCAR (p12)**

The OSCAR should be set up so that only the direct measurements made by the reporter (e.g. kwh, tonnes of fuel used, etc.) need to be entered. The OSCAR should automatically convert units and perform calculations to reduce confusion/ mistakes with the user doing the calculations.

Companies should be given a grace period of at least 1 year for not reporting *all* required information. This is important as information for large and multi-site companies will be extensive and diverse in nature. A grace period will allow some companies that don't currently record all of the required information to implement new record keeping procedures.

### **Record keeping (p12)**

Requires a minimum time limit on how long companies are legally required to retain records relating to what they have reported.

### **Sampling and analysis of samples (pg 18)**

Monthly/ weekly sampling of fuels is excessive: data should be able to be provided by the supplier of the fuel to all consumers.

### **Other sectors: Ag, Forestry and land use (pg 21)**

The document is not clear whether emissions from agriculture need to be calculated and included in total emission for a facility. Page 9 states that they are not included in the short term, however page 21 references a document for their calculation. If emissions are not to be included this needs to be restated at page 21 to avoid confusion.

### **Liquid fuel (pg 41)**

It is not clear if companies that have fleet cars are required to report on the total volume of fuel used by the fleet cars, or if work and personal use of fuel need to be separated. If personal use of a fleet vehicle is to be excluded this needs the option of being based on estimation; or measured for a one month period to determine percentage of private/personal use.

Table 13 in the heading says these figures are for vehicles with an average age less than two years; the paragraph introducing the table says the figures in table 13 can be used in the average year of production is later than 2004; this could result in the average age being greater than two years.

Table 22 (pg 59).

Guidelines should provide advice on how to adjust invoices for changes in stocks (eg. fugitive emissions from storage of volatile fuels), or reference acceptable methods.

Waste to Landfill (pg 114)

Does this apply to farms with onsite burial of stock, inert material etc.

Waste water treatment – Industrial (pg 120)

Table 64 does not clearly identify if wastewater from intensive agricultural activities (i.e. feedlots) are part of the 'Meat and Poultry' Commodity, or if this is referring only to abattoirs.

Reporting (pg 115)

Tonnes of waste disposed of over the life of a facility may be difficult to estimate for sites that have been operating for a long period of time, whose capacity over time has changed and/or who have changed owners. Thus a minimum time frame should be given on how far back companies have to estimate.

Transport (pg 140)

Calculation refers to table 77; should this refer to table 78?

Indirect emissions require invoice/ inventory information from contract transports; this may require commercial in confidence data that transport contractors normally wouldn't supply. These emissions may also be double counted as they may be reported by the contract company's direct emissions.

General comments:

Regarding the collection of data there should be several options for *how* information is collected – eg for transport emissions should allow calculation to be based on fuel used OR kms travelled OR operating hours, etc. This is important as it allows companies to use existing record keeping practices implemented for different legislation. This will also allow companies to report without having to implement impractical recording practices that don't provide information useful for anything other than reporting for this piece of legislation.

Companies should also get useful feedback for the information they have collected and submitted (e.g. advice on offsetting emissions, etc.).