

Northmore Gordon Environment Pty Ltd
(formerly Wattly Pty Ltd)

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DCCEW

via email: ACCUScheme@dcceew.gov.au

Re: ACCU Discussion Review Paper: NG Response

Dear DCCEW,

Thank you for the opportunity to provide feedback on the ACCU Discussion Review Paper.

Our response to the questions can be found [in blue](#) on the subsequent pages.

If you have any questions or would like any further information or clarification, please do not hesitate to contact me.

Kind regards,



Patrick Blain
General Manager

Submission by Northmore Gordon Environmental

Response text in blue

1. Are the proposed principles fit for purpose and how should they be applied to improve ACCU Scheme governance and integrity?

No feedback from Northmore Gordon.

2. Is there other information that could be published or collected to improve the transparency of the ACCU Scheme?

The information that to be collected and published should be method specific.

Domestic, Commercial and Industrial Wastewater

- already in discussion paper: project baseline percentage; site specific methane proportion
- NG proposes the following information to be reported:
 - waste type (domestic, commercial, industrial)
 - nature of combustion (e.g. flare, in a boiler, in an oven)
 - use of Subdivision B or C for calculation of Baseline emissions

Energy Efficiency Projects

- already in discussion paper: equipment installed, upgrades undertaken
- NG proposes the following information to be reported in addition to those suggested above:
 - an End User Equipment Category, similar to that used in PIAMV (<https://www.energysustainabilityschemes.nsw.gov.au/Home/About-ESS/Energy-savings-calculation-methods/Project-Impact-Assessment-with-MV>)
 - building envelope
 - commercial heating/cooling
 - industrial heating/cooling
 - power generation systems
 - power supply/distribution systems
 - fluid transport and materials handling
 - industrial processes (other)
 - information and communication technology
 - lighting
 - major equipment removed as a part of Energy Efficiency Project
 - major equipment modified as a part of Energy Efficiency Project
 - major equipment installed (where applicable) as a part of Energy Efficiency Project
 - fuel (or fuel types) where there is a reduction in consumption due to the Energy Efficiency Project
 - fuel (or fuel types) where there is an increase in consumption due to the Energy Efficiency Project

Waste Diversion

- already in discussion paper: technology used, volumes and content of waste diverted
- NG proposes the following information to be reported in addition to those suggested above:
 - whether it is a new, expansion or transitioning project

3. What information should be published about ACCU holdings that delivers greater transparency in the market?

No feedback from Northmore Gordon.

4. What are the risks to the market from publishing information about ACCU holdings?

Some of the information listed under Question 2 could provide intelligence to competitors of the Project Site with regards to their activities, and associated commercial implications.

A potential method to mitigate the business risk would be to delay reporting the details of the project until after the first registration of the ACCUs associated with that project.

5. Are there other grounds or circumstances where information should be withheld, for example, an exemption for existing projects?

If the Energy Efficiency Project is at a high security government site, then Northmore Gordon would consider an exemption from publishing any details relevant to the project to be appropriate.

6. Should the government continue to focus its purchasing on least cost abatement? If not, what other considerations should it prioritise and why?

No feedback from Northmore Gordon.

7. Should the pilot exit arrangements for fixed delivery contracts be made permanent? Would requiring a minimum percentage be delivered to government in each window help strengthen market confidence and reduce risk?

Northmore Gordon support the exit strategy to be made permanent.

8. What assistance or guidance would proponents need to effectively participate in the EOI process?

For ACCU Projects in the land sector, there is little clarity around what a participant is buying when deciding on an offset to purchase.

The CER registry should disclose the following information in one easy to locate place:

- Name and location of the project
- Life span of the project
- Size of the Project, i.e. number of trees, size of the land
- Species of trees being grown
- Risks to the project and how they are mitigated or accounted for –
 - bush fires
 - domestic species affected
 - feral species in the area quantified
- Employment opportunities for locals
- Climate, community and bio-diversity benefits
- Photos of the project throughout its life cycle
- Annual cost to manage and update the project
 - Annual reports to CER on the project operations
 - Including Profit & Loss
 - Balance Sheet
 - Cash Flow
- Who are the land owners, the project participants, and certificate providers

9. Does the proposed content of an EOI submission balance the need to deliver enough detail to enable a robust assessment, while limiting the upfront investment to a reasonable level?

Please see our response to Question 10

10. Will the proposed approach to triaging EOIs promote participation and efficiency?

NG does not see any efficiency gains by making any EOI submission a two-step (triage) process. NG can recognise how triaging would support the OIS & CER and its workload by allowing it to prioritize and rank different EOIs. NG would like to see a more efficient outcome for ACCU project owners and create more transparency around every project on the CER registry investors and participants.

Questions 11. – 28.

No feedback from Northmore Gordon.