

10th September 2018

Sent via email: submissions@climatechangeauthority.gov.au

Attn: Climate Change Authority

Woodside submission to the review of the National Greenhouse and Energy Reporting legislation

Woodside welcomes the opportunity to make a submission to the Climate Change Authority's (CCA) consultation on the National Greenhouse and Energy Reporting (NGER) legislation. Woodside's response is informed by our experience reporting under the NGER Act, as well as our climate change policy and advocacy principles.

Woodside acknowledges the important role of the NGER system, supporting robust and consistent emissions and energy reporting in Australia and supports the CCA review of what's working well and what could be improved. Predominantly, the system is largely fit for purpose and is one of the stable building blocks of Australian policy however, there is potential to make incremental improvements and opportunities for streamlining.

The policy premise of the Safeguard Mechanism (SGM) may not provide a sufficient signal to drive least cost abatement from the industrial sector. As such, Woodside advocates that changes could be made to the Safeguard Mechanism to improve Australia's emissions reduction efforts.

As well as summarising our key points below, this submission includes the following appendices:

Appendix 1: About Woodside and our approach to climate change

Appendix 2: Specific comments on greenhouse and energy reporting

Appendix 3: Responses to specific consultation questions

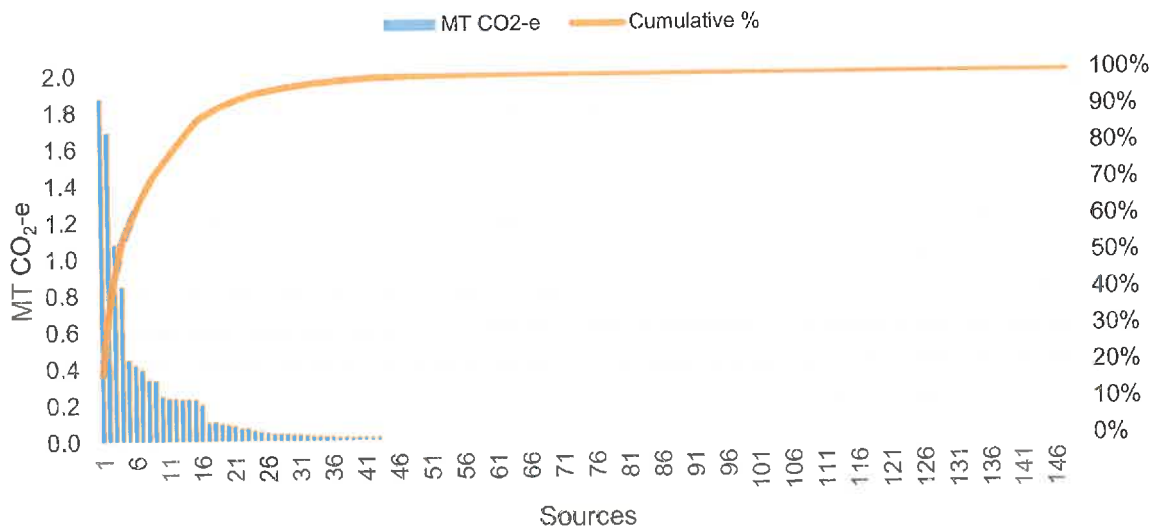
Energy and emissions reporting

In the spirit of constructive and transparent dialogue, Woodside proposes several improvements to NGER's emissions and energy reporting components, including:

- Consider allowing the Clean Energy Regulator to permit the use of audited engineering calculations where method 1 calculations are demonstrably inconsistent with the NGER Measurement Determination's (MD) principles and use of higher order methods are infeasible;
- Capture methane vented from wet seals on compressors as an individual item in subsections 3.49(2) and 3.72(2) of the MD;
- Review historic NGER data sets to identify emission sources that do not make a material contribution to a) the National data set, or b) an industry and exclude them from being reportable for a) any reporter or b) reporters from a certain sector. This would significantly simplify reporting while still providing a meaningful dataset. For example, removing the requirement for oil and gas respondents to report petroleum based oils and greases, sulphur hexafluoride emissions and waste water treatment would simplify reporting, without materially change reported emissions or energy use;

- Revise treatment of energy consumed, but not combusted to ensure that the MD is clear and reflects international reporting requirements and NGER principles;
- Remove the requirement to report peripheral or meta data that does not have an obvious use, including; measurement criteria, uncertainty calculations, matters to be identified and notification requirements regarding out of service equipment.

A key insight considered when preparing this submission is that Woodside's emissions are concentrated in a small proportion of sources. In Woodside's inventory, over half of reported emissions are from four sources. Conversely, over two thirds of our emission sources account for only 1% of emissions.



Safeguard Mechanism

Although the CCA review is principally a review of existing legislation, Woodside encourages consideration of earlier comments made to the Department of Environment and Energy's (DoEE) review in March 2018 regarding the stability and effectiveness of long term policy.

Many of the investments Woodside is currently considering are scheduled to start after 2020 and are subject to significant climate change policy uncertainty. Much of the uncertainty is due to benchmark intensities not yet being defined and the SGM being silent regarding trade competitiveness. This increases project risk and therefore discourages investment. As such, Woodside reiterates support for the recommendations of the Finkel review, the 2017 Climate Change Policy Review and Woodside's previous submissions that climate change policy should be enduring, bipartisan and coordinated between federal and state governments.

Woodside understands from its DoEE consultation to date that post 2020 benchmarks will be based on an assessment of leading practice, or the most efficient 10% of Australian facilities, with the premise that other facilities will need to reduce their emissions, or source carbon credits. For those facilities with international competitors, this reduces competitiveness of Australian producers by imposing costs that their competitors do not face, and minimising the flexibility available to emitters. Careful consideration should be given to minimising this distortion, with potential options including:

- Ensuring the eligibility of quality international offsets to acquit emitters' obligations under Australian regulatory requirements, and in turn, to acquit Australia's obligations under international agreements;
- Using default (i.e. average) emissions intensities for benchmark baselines for trade exposed industries;
- Formally assessing competitiveness impacts when establishing benchmarks, by comparing the effective costs posed on Australian based trade exposed industries, with those based in other

jurisdictions. Of relevance to our business, is that other LNG exporting nations are not Australia's traditional trade partners and include Qatar and Nigeria – neither of which seem likely to impose carbon costs on their domestic industries in the foreseeable future. Trade competitiveness could be reviewed on a regular basis – ideally as part of the five-yearly review of Australia's climate targets and policies;

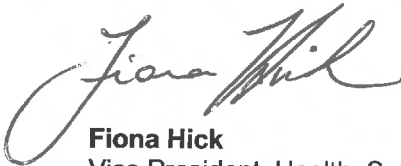
- Allowing trade exposed facilities (or possibly all facilities) to generate Australian Carbon Credit Units (ACCUs) where their emissions are below their baseline, noting that this will require an amendment to the existing ACCU process and possibly make several Carbon Farming Initiative methods redundant. This would provide an additional incentive to deliver all cost-effective abatement, not just manage emissions where necessary to avoid an excess emissions situation.

Conclusion

Woodside sees the energy and emissions reporting components of the NGER legislation as mature and generally fit for purpose. There are however areas to improve accuracy of reported energy and emissions and to streamline the system. We see greater opportunity to modify the safeguard mechanism so that it provides a clearer investment signal to deliver least cost abatement, whilst considering impacts on Australia's trade competitiveness.

We would welcome any further engagement regarding the NGER legislation or any other aspect of Australia's climate change policy.

Yours sincerely



Fiona Hick
Vice President, Health, Safety Environment and Quality

Copy:
Department of the Environment and Energy
Clean Energy Regulator

Appendix 1: About Woodside and our approach to climate change

Woodside is Australia's largest independent oil and gas company. We have a global portfolio and are recognised for our world-class capabilities as an explorer, developer, producer and supplier of energy. Our mission is to deliver superior shareholder returns through realising our vision of becoming a global leader in upstream oil and gas. Our assets are renowned for their safety, reliability and efficiency, and we are Australia's most experienced liquefied natural gas (LNG) operator.

Our producing assets in Australia include the landmark North West Shelf (NWS) Project, which has been in operation since 1984. In 2012, we commenced production from the Pluto LNG Plant and in mid-2017 we added additional volumes from our non-operated Wheatstone LNG interests.

We continue to be at the forefront of our industry by seeking to grow new markets for LNG. To achieve this, we are planning for Australia's first LNG fuel hub to capture growing land and marine LNG fuel markets.

Woodside is characterised by strong safety and environmental performance in all locations where we are active and we are committed to upholding our values of integrity, respect, working sustainably, discipline, excellence and working together.

Woodside's approach to climate change

Woodside recognises the scientific consensus on climate change and the challenge of providing safe, clean, affordable and reliable energy whilst reducing emissions. Woodside is committed to being part of the solution.

We believe oil and gas will continue to be vital in meeting the world's energy needs and that the benefits of natural gas, in particular, will see it play an increasingly important role globally both in the energy mix and in reducing greenhouse gas emissions by replacing coal and integrating with renewables to address intermittent power generation.

To achieve this, Woodside pursues a number of strategies which ensure the resilience of our portfolio, improve the carbon performance of our facilities and developments, and communicate the future role of gas. These include:

- Promoting natural gas in the energy mix as a means to reduce greenhouse gas emissions, support renewable energy and improve local air quality;
- Promoting and pursuing a culture of energy efficiency and improved resource use in our own designs and operations;
- Supporting our host countries in their endeavours to set emissions reduction targets in accordance with internationally accepted science and to achieve these targets using efficient and stable policies;
- Supporting lowest cost abatement through global carbon pricing;
- Evaluating the resilience of our portfolio and investment decisions to potential changes in global climate policy;
- Setting and publishing targets to encourage innovation and drive reductions in our carbon footprint and energy use; and
- Pursuing greenhouse gas emission reduction technologies with our peers and scientific institutions.

Where Woodside has the opportunity to engage with governments about their climate change policies, we are guided by some key principles.

We recognise that an ideal policy – global in nature, stable over the long term, with targets based upon science, and delivering objectives at the lowest global cost – is not currently contemplated by the international community through a single mechanism or institution. Instead, pragmatic and incremental policies should be (and are being) implemented, but should trend towards the ideal whilst mitigating the interim potential disadvantages of piecemeal action. For example:

- Policy objectives and targets should be based on the internationally accepted climate **scientific consensus**. National commitments and actions should be geared to make appropriate contributions to the scientifically derived global objective. Formal review cycles should ensure targets remain appropriate and that policies are effective in achieving them.

- Policies should target action to which ever global sector or geography can **meet objectives at the lowest cost**. To reduce the gap to global action, jurisdiction should be held at the highest level of a country's system of government, and should endeavour to link internationally where possible. We believe that free markets efficiently allocate resources, and that a global market for high quality offsets should be encouraged and supported. Pre-competitive research and development support should be deployed to accelerate lower emission technologies down their cost curve in order to reduce the future marginal cost of abatement.
- Policies should **enhance national competitiveness and reduce trade distortion** by targeting relief to energy intensive trade exposed (EITE) sectors that compete with, or export to, markets that impose less ambitious policies upon their own equivalent sectors. About 90% of the emissions from Woodside's value chain comes from our customers using our end products and this means that differential treatment of emissions by other countries in the value chain will be highly distortive if not levelled by EITE policy. Without effective EITE relief, the pace of national action will be constrained by the needs of the most vulnerable sector.
- Policies should be **enduring over the long term** in order to allow sound investment decisions. This means that they must accommodate the delivery of competing priorities such as energy security, energy poverty, economic development, and urban air quality; and they need to survive election cycles which implies a need for political compromise and pragmatism in service of bipartisan consensus.

Appendix 2: Specific comments on greenhouse and energy reporting

Material inaccuracies

Although we acknowledge the challenge that the NGER system has establishing reporting regulations that cover all material emissions sources in Australia, it's worth noting that Woodside has two specific examples where the NGER regulations are demonstrably inaccurate and therefore inconsistent with the MD's own principles.

Method 1 flaring

Part 3.3. – Oil and natural gas – fugitive emissions (subdivisions 3.3.3.3 and 3.3.9)

Method 1 flaring requires that default factors are used, which are based on a fixed gas composition. Several of Woodside's flares have significantly higher levels of inert gas than the MD assumes. Higher order methods are infeasible due to sampling requirements:

- a. taking representative samples of flare streams is inherently difficult since flare quantity and composition is highly variable
- b. installing compositional analysis (such as a gas chromatograph) in flare systems introduces additional safety risks and is challenging to schedule since the flares are often required to be left in service, even during major maintenance events.

This results in Woodside overreporting emissions from this source by several hundred thousand tCO₂-e per year, relative to engineering calculations.

Woodside recommends that the definition of flared mass (defined in tonnes in the MD) be consistent with the volumetric measurement of fuel gas within the definition section of the MD, and be measured on a dry gas basis. Woodside also recommends that appropriate engineering calculations be allowed as an alternate method to verify the quantity of inert gases in the flare stream, given the inherent metering limitations of flared streams.

Wet compressor seal systems

The design of some older compressor seal systems results in methane venting to the atmosphere. Following a review of the MD, the referenced API compendium and consultation with the Clean Energy Regulator, emissions from these compressor seal systems appear to be captured in the general leaks factor (section 3.72(2)) of the MD for method 1 reporting. Although compliant with the MD, this underreports the scale of the vent from these seal systems by several hundred thousand tCO₂-e per year, relative to engineering calculations. Moving to method 2 reporting for fugitives in natural gas processing does not appear to be contemplated for a single fugitive emission source.

Woodside recommends wet seals be added as a separate line item in 3.49(2), 3.72(2) of the MD.

Although these two issues largely balance each other out in Woodside's inventory on a CO₂-e basis, they skew the balance between CO₂ and CH₄ in our inventory. To ensure that we report accurately and transparently in our voluntary reporting (such as in our Sustainable Development Report or CDP), we do not use NGER methodologies when reporting these sources.¹

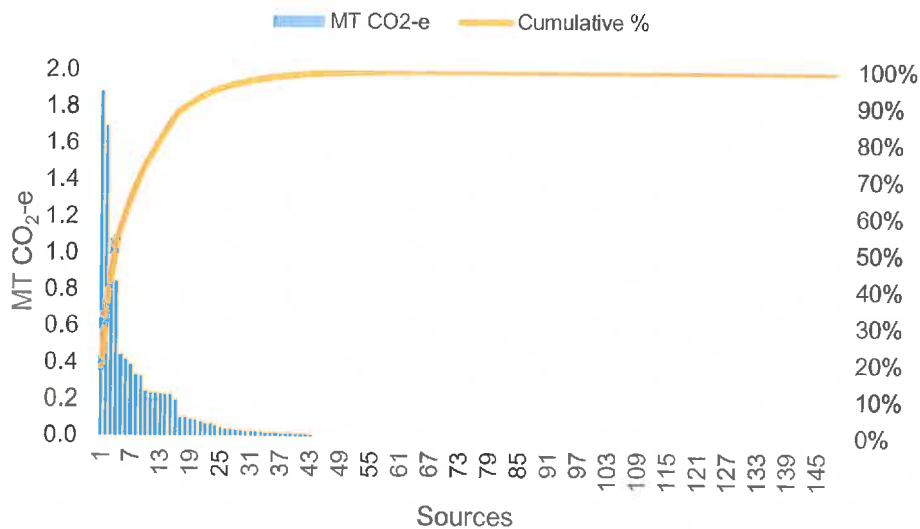
Treatment of immaterial sources

NGER has been successful in its objective to streamline multiple reporting systems and regulations across Australia. However, as the legislation has matured, the regulations and compliance regime has become more detailed and specific. At times this additional detail has added much needed clarity. At other times, it has increased regulatory burden without materially improving data quality.

Listing Woodside's emission sources from smallest to largest, shows that of the approximately 150 emission sources in our inventory:

- Half the inventory is covered by four sources
- The combined emissions from the smallest 107 sources is less than 1% of the inventory

¹ Woodside Sustainability Website, <<http://www.woodside.com.au/Working-Sustainably/Pages/Sustainable-Development-Report.aspx>>



Energy production and consumption is similarly concentrated in a small minority of sources and the following comments regarding streamlining of emissions reporting also apply to energy reporting.

Based on Woodside’s reporting experience, minor energy and emission sources take a disproportionate amount of effort relative to their impact on an inventory.

Reporting thresholds

We welcome the use of thresholds to simplify the calculation methods for minor emission sources. However, determining whether these sources are below the appropriate thresholds often requires that the emissions be calculated. This typically requires that emissions calculation needs to be completed to decide whether the emissions calculation needs to be done. As such, we’d propose additional considerations be made to reduce reporting burden of immaterial sources.

In many cases, certain sources may not be material for any reporter, or any reporter in a certain industry. We’d recommend that the CCA conduct a review of the NGER data set to assess whether selected sources could be removed from the MD, or at least no longer need to be reported for certain industry sectors without impacting on usefulness of the data set. We note that the MD includes precedents for this, such as limiting refrigerant emission reporting to certain sectors based on ANZSIC code. From our experience, we’d propose the following be excluded from reporting for the oil and gas sector:

- Sulfur hexafluoride emissions from switch gear (0.02% of our FY17 inventory)
- Petroleum based oils and greases for all sectors (0.002% of our FY17 inventory)

We would also recommend that where a facility does not have reportable scope 1 emissions, scope 2 emissions do not need to be reported, irrespective of how large the scope 2 emissions are. Since these scope 2 emissions are already captured in the NGER data set as scope 1s, this seems like it would not adversely impact the integrity of the national accounts. If this is unfeasible, then expressing the reporting threshold for scope 2 emissions as a fraction of the controlling corporations’ scope 1 emissions (say 3%) would prevent responders of large emitters focussing on immaterial sources.

Introducing a *de minimus* reporting threshold for scope 1s would also be useful. Our reporting of sources such as diesel for transport around our facilities, or acetylene for welding seems disproportionately burdensome considering the minor impact they make to our inventory. As an example, setting a 1000 tCO₂-e *de minimus* limit, would reduce the number of emission sources in our inventory by more than 50%, whilst still capturing 99.92% of our emissions. The 0.08% that would be excluded based on this threshold would fall within the uncertainty of the emission factors provided in the MD.

Energy consumed not combusted

It is unclear in legislation how the energy content from venting and fugitives needs to be reported, and how separate instance of a source provisions may apply to these activities.

To provide some context, Woodside has vent and fugitive streams of vastly different scale and composition. Our largest vent comes from our acid gas removal units (AGRU). Across our portfolio the AGRUs vent over one million tonnes of CO₂ per year, as well as a small fraction (well below 1%) of hydrocarbon. Conversely, we have potential leak points such as bolted pipe flanges. Infrared surveys of these potential leak points confirm that they very rarely have a detectable leak, but when small weeps occur, they may be close to 100% methane.

The MD methods for calculating emissions from the range of fugitive and vent sources is generally appropriate, but the energy consumption rules are ambiguous.

Woodside believes that the NGER legislation should clearly specify:

1. how an instance of a source is defined (for example, can each bolted flange be treated as a separate source and hence deemed to be below the reporting threshold stated in section 2.68 of the NGER Regulations); and
2. how to assess energy content, noting that:
 - a. Part 3.3 of the MD often provides information about the quantity of methane but not for other molecules.
 - b. vent streams can effectively vary from zero to 100% hydrocarbon.

The venting and fugitive leak sources in the Energy and Emission Reporting System (EERS) do not allow an energy content to be added. We ask that the Regulator update EERS to allow energy content to be entered for these sources.

Other streamlining opportunities

Section 1.19 of the MD requires that reporters notify the Regulator if equipment used to report emissions is out of service for more than 6 weeks (cumulative, throughout the reporting period). Woodside contends that this information is not necessary for the national data set and reporters should not be required to report on this.

Section 2.23 This section may be interpreted to require that bias be tested using unspecified standards. We would contend that sampling of fluids (gases and liquids) is inherently free of bias and as such, this clause should be clarified to only apply to sampling solids.

Section 2.25 Specifies monthly sampling (as a minimum) for gas sampling for higher-order methods. Woodside recommends this clause be amended to allow for less frequent sampling, where the composition of the stream is stable.

Section 2.27 requires methane emissions from the consumption of gaseous fuels to be calculated using factors in the Intergovernmental Panel on Climate Change (IPCC) guidelines. This requires Woodside to convert the IPCC factor from kgCH₄ to kgCO₂e then correct to gross calorific value. This is inconsistent with other emission factors listed in the MD and creates complexity in the audit trail. Woodside recommends that the relevant emission factors be included in the MD so the reference to IPCC can be removed.

Sections 2.28-2.29 requires that reporters report the 'measurement criteria' used for each source. It is not understood where this information is used, or how it could be useful. As such, Woodside suggests that the requirement be removed. If this information is of use, then we'd recommend that Section 2.29(3) prohibiting the use of lower order measurement criteria than previous years be removed, since this seems to be driving an increase in rigour of measurement, which is outside the MD's principles.

Chapter 8: Assessment of Uncertainty. Although it is acknowledged that uncertainty calculations have been streamlined for small sources and those using method 1 calculations, it would preferable to completely remove or at least automate uncertainty calculations for emission sources reported using higher order methods. If there are reasons that the remaining uncertainty calculations are needed, it is recommended that the reasons for this are communicated with NGER reporters.

Alignment with the National Pollutant Inventory (NPI)

The NPI and NGER have different objectives and scopes, so should remain separate. They are however often compiled using similar activity data and compiled by the same people **within** an organisation. As such, harmonisation between NPI and NGER rules could simplify reporting, including in these sections:

- Definitions of operational control
- Reporting thresholds
- Application of part year reporting
- Remove NPI requirement for geographical proximity (some of our facilities encompass pipelines that are several hundred km)

Appendix 3: Responses to specific consultation questions

Chapter 2: National Greenhouse and Energy Reporting Scheme

Q.1	Do the National Greenhouse and Energy Reporting scheme reporting thresholds balance coverage with administrative costs? Should thresholds be increased, decreased or kept as is?	As the NGER system has matured, a continuous improvement approach has resulted in it becoming more burdensome. An example of this is the expectations placed on the oil and gas industry regarding the maintenance of meters, which does not consider that the materiality of the flow through different meters is vastly different. Thresholds for reporting could be increased, especially for minor sources and scope 2 emissions. An alternative solution could be to use the historical NGER data set to assess which sources are material – (at both national and sectoral levels) and remove those that do not have a material impact. Examples for the oil and gas sector include a) sulfur hexafluoride emissions, b) waste water treatment and c) petroleum based oils and greases.
Q.2	Should the scope of reporting under the National Greenhouse and Energy Reporting scheme be expanded or reduced e.g. to include or exclude certain greenhouse gases, emissions sources, inventory sectors or types of entities who report?	Woodside advocates that all sectors of the economy should be covered by climate and energy policies that deliver least cost abatement. We note that this does not currently apply in certain sectors, such as agriculture and passenger vehicles, but would not necessarily advocate that coverage of these sectors would be best achieved by making them report under the NGER system.
Q.3	Do you have any feedback on the annual policy and consultation process to update the measurement determination?	Woodside is satisfied with the current arrangements.
Q.4	Are the methods for reporting emissions and energy in the measurement determination fit for purpose?	These are generally fit for purpose, but Woodside has two specific examples where the currently available methods do not comply with the objects of the NGER Act or the principles of the MD. See page 6 for more information.
Q.5	Does the frequency and timing for reporting cause any particular issues for companies?	Annual reporting is appropriate. Aligning timing of key dates under the safeguard mechanism with the NGER submission date effectively means that NGER reports need to be completed well in advance of the NGER due date however. Providing additional time to make Safeguard submissions would assist.
Q.6	Is the Emissions and Energy Reporting System tool easy to use and fit for purpose?	EERS could be improved by collating the energy consumption with emissions reporting in all relevant instances and allowing automatic data upload rather than manual entry. These improvements would reduce the chance that data entry errors are fed into the NGER data set.
Q.7	Are there emissions and energy data that companies would like to report through the Emissions and Energy Reporting System but are currently unable to? Would the development of a voluntary tool be useful for this information?	All of Woodside's material energy and emission sources are captured by NGER. We do not see material risks in allowing NGER and EERS to be used voluntarily as long as data quality was maintained and/or voluntary submissions were clearly identified.
Q.8	Are there opportunities to streamline emissions and energy reporting obligations under the National Greenhouse and Energy Reporting scheme and other programs?	There are several areas that NGER could be streamlined, including by adjusting reportable sources, reporting thresholds, and removal of measurement criteria, matters to be identified and uncertainty calculations. See pages 6-8 for more information. Additionally, aligning definitions of operational control and threshold limits between

		<p>NGERs and NPI would facilitate a more coherent data set across national environmental reporting obligations.</p> <p>State governments should be engaged to ensure ACCUs surrendered under the Safeguard Mechanism count towards any state based requirement to manage emissions. Failure to do this could result in a legal obligation to offset the same emissions under both state and federal schemes.</p> <p>Climate related risk in the energy industry is strongly related to the future energy mix. Historic emissions recorded in NGER is therefore of limited use when assessing climate related risk.</p> <p>We rarely use the NGER data set for internal analysis.</p> <p>We do not have enough experience with international reporting schemes to comment.</p>
Q.9	<p>How does the National Greenhouse and Energy Reporting scheme contribute to providing useful information for climate-related risk disclosure or other data users and are any enhancements to the reporting scheme desirable?</p> <p>Is reporting of emissions and energy data meeting the needs of data users and inducing change in business operations? If so, how?</p> <p>Are there learnings from international emissions and energy reporting schemes that could be applied in Australia?</p>	
Q.10		
Q.11		
<p>Chapter 3: Safeguard mechanism</p>		
Q.12	<p>Is the safeguard mechanism delivering on its objectives and fit for purpose?</p>	<p>We see that the safeguard mechanism is delivering its object as defined in the NGER Act. Woodside however advocates that we need a whole of economy policy that drives lowest cost abatement. As such, the object could be adjusted to support the safeguard mechanism contributing to lowest cost abatement across the sector.</p> <p>Yes</p>
Q.13	<p>Are the emissions thresholds under the safeguard mechanism efficient and effective or should they be changed so more or fewer emissions are covered?</p>	<p>Possibly a more important consideration is the treatment of the electricity sector. With the current policy uncertainty around the electricity sector and the low likelihood that the sectoral baseline will be exceeded, alternative mechanisms that allow the safeguard mechanism to provide a marginal cost to the electricity sector could be considered.</p> <p>Where changes to the MD lead to changes in reported, but not actual, emissions, there's an argument that this should be reflected in baselines. Maintaining environmental integrity without excessively increasing administrative burden makes this challenging however. Consideration could be given to allowing this to happen where:</p> <ul style="list-style-type: none"> • Both increases and decreases to reported emissions are captured • Sufficient historic data exists to accurately calculate a revised baseline
Q.14	<p>Should the scope of the safeguard mechanism be expanded or reduced if changes are made to the emissions and energy reporting scheme?</p>	
Q.15	<p>Should the provision allowing baseline variations in response to a change in global warming potentials be extended to other changes that may occur in the measurement determination?</p>	
Q.16	<p>Is the single reporting rule for transport fit for purpose?</p>	<p>Woodside does not have transport facilities, so cannot comment.</p>
Q.17	<p>Should facilities be able to use the same emission reductions to meet safeguard mechanism and Emissions Reduction Fund contract obligations?</p>	<p>In some situations, this allows a responsible emitter to financially benefit twice from the same emissions reduction. Although doubling the incentive to reduce emissions may accelerate emissions reductions, it will still distort the scheme. Consideration could be given to preventing this.</p>

Q.18	What actions are facilities taking to meet safeguard mechanism obligations and are the options available to facilities to manage their excess emissions effective and efficient?	Woodside has publicly committed to improving our energy efficiency by 5% by 2020. This has driven an increased focus on energy efficiency, resulting in both major capital investment and operational improvements across our operated facilities. Compliance with the safeguard mechanism is one of many drivers behind this commitment.
Chapter 4: Data use and publication		
Q.19	Are the publication thresholds set at the right level?	Woodside is satisfied with the current arrangements.
Q.20	Are any changes required to the data reported, when it is published or how it is published?	Woodside is satisfied with the current arrangements.
Q.21	Do the rules for data publication and sharing balance the public interest with commercial or other interests or should they be changed?	Woodside is satisfied with the current arrangements.
Q.22	Are the processes in place for accessing National Greenhouse and Energy Reporting data efficient and user-friendly?	Woodside is satisfied with the current arrangements.
Q.23	How do you access and use emissions and energy data published or shared under the National Greenhouse and Energy Reporting legislation and are any improvements required?	We rarely use company level data for internal analysis and decision making, but do access NGER data through the tables published on the Clean Energy Regulator's website. We access national level data through the DoEE's published inventories and Australia's Greenhouse Emissions Information System (AGEIS) and use this to inform our understanding of the effectiveness of current policies and, by extension, policy stability.
Q.24	How should the National Greenhouse and Energy Reporting scheme evolve over time to support changing data needs?	Woodside is satisfied with the current arrangements.
Chapter 5: Audits		
Q.25	Is the audit framework in the National Greenhouse and Energy Reporting legislation effective and efficient at ensuring compliance?	Woodside is satisfied with the current arrangements.
Q.26	Are there opportunities for improving the audit framework such as reducing the cost of audits or making the audits more effective?	Woodside is satisfied with the current arrangements.
Q.27	What other government or non-government programs use the National Greenhouse and Energy Reporting audit framework?	Woodside is satisfied with the current arrangements.
Q.28	Do the requirements for auditors effectively balance the cost and quality of audits?	Woodside is satisfied with the current arrangements.
Q.29	Are there enough quality auditors available?	Woodside is satisfied with the current arrangements.
Chapter 6: Governance and compliance		
Q.30	Is the guidance provided by the Clean Energy Regulator on its website, and through other channels such as by phone or email helpful in complying with National Greenhouse and Energy Reporting legislation obligations? How (if at all) could it be improved?	In our experience the guidance provided by the Clean Energy Regulator provides a sound starting point for understanding the NGER system. Clean Energy Regulator staff provide quality and professional advice where detail beyond the guidance is necessary.

Q.31	Does the timing of obligations for National Greenhouse and Energy Reporting and the safeguard mechanism allow sufficient time to meet the obligations?	Aligning timing of key dates under the safeguard mechanism with the NGER submission date effectively means that NGER reports need to be completed well in advance of the NGER due date. Providing additional time to make Safeguard submissions would assist.
Q.32	Does the Clean Energy Regulator have sufficient powers to encourage compliance with the National Greenhouse and Energy Reporting legislation?	Woodside is satisfied with the current arrangements.
Q.33	What has been your experience of any compliance or enforcement activities by the Clean Energy Regulator?	In Woodside's experience, the CER has been constructive and professional when dealing with any compliance activities.
Q.34	Are there any opportunities for improvements in the Clean Energy Regulator's decision making and review process?	As per page 6, we would recommend that the CER be given the power to authorise the use of audited engineering calculations where method 1 calculations are inconsistent with the NGER MD and higher order methods are infeasible.
Q.35	Are there any other matters relevant to this review you wish to raise?	<p>As per our covering letter:</p> <ul style="list-style-type: none"> • post 2020 policy uncertainty as a key issue for our business • we support international carbon trading since it allows for greater emissions reduction ambition and supports least-cost, global abatement.

