

1 November 2021

Energy Policy and Partnerships Section
Clean Energy Regulator
GPO Box 621
CANBERRA ACT 2601

By email: CER-CERT@cer.gov.au

Dear Sir and Madam,

Consultation for the Corporate Emissions Reduction Transparency (CERT) report

Chartered Accountants Australia and New Zealand (CA ANZ) welcomes the opportunity to provide feedback to the Clean Energy Regulator on the consultation referred to above. We have focused our feedback on those areas where we consider we can add the most value as detailed below. Appendix A provides more information about CA ANZ.

CA ANZ continues to be an advocate for, and supporter of, a just transition to a low-emissions economy. As a professional body, CA ANZ seeks to advocate in the public good on policy areas that impact our members, profession and the public. CA ANZ broadly supports the intent of the CERT report and its implementation. We recognise that widespread adoption of CERT report would facilitate greater transparency, robustness and reliability of climate-related disclosures in the areas covered.

Regarding the company and datasheet views, we have a few comments to make:

- To ensure that the information included in the CERT report is understood by potential users, we consider it will be useful to include a brief explanation of the purpose of the CERT report and the scope of information contained in both the company and datasheet views. Not all the users of the CERT will have an in depth understanding of existing NGERs reporting.
- References to 'progress verified' or 'company assured' information should make it clear who has provided this assurance or verification eg 'progress verified by CER' or 'company self-assured'. Consideration may also be given to providing companies who have obtained independent external assurance over their other commitments to indicate this.
- The company view should include a requirement for organisations to show the choice of accounting option. Further, where the organisation has made a change to this choice, they should also be required to disclose the change and briefly explain why. These requirements would help facilitate consistency and comparability of CERT information across reporting periods.
- Finally, information in the CERT report should be linked to other emissions-related disclosures published by the organisation in line with other reporting frameworks, as well as an explanation or reconciliation of the differences between disclosures (for example, between the disclosures in the CERT report and the TCFD recommendations).

Should you have any questions about the matters discussed above or wish to discuss them further, please contact Karen McWilliams via email at karen.mcwilliams@charteredaccountantsanz.com or phone (612) 8078 5451.

Yours sincerely

Simon Grant FCA
Group Executive
Advocacy & Professional Standing

Karen McWilliams FCA
Business Reform Leader
Advocacy & Professional Standing

Appendix A

About Chartered Accountants Australia and New Zealand

Chartered Accountants Australia and New Zealand (CA ANZ) represents 131,673 financial professionals, supporting them to make a difference to the businesses, organisations and communities in which they work and live. Chartered Accountants are known as Difference Makers. The depth and breadth of their expertise helps them to see the big picture and chart the best course of action.

CA ANZ promotes the Chartered Accountant (CA) designation and high ethical standards, delivers world-class services and life-long education to members and advocates for the public good. We protect the reputation of the designation by ensuring members continue to comply with a code of ethics, backed by a robust discipline process. We also monitor Chartered Accountants who offer services directly to the public.

Our flagship CA Program, the pathway to becoming a Chartered Accountant, combines rigorous education with mentored practical experience. Ongoing professional development helps members shape business decisions and remain relevant in a changing world.

We actively engage with governments, regulators and standard-setters on behalf of members and the profession to advocate boldly in the public good. Our thought leadership promotes prosperity in Australia and New Zealand.

Our support of the profession extends to affiliations with international accounting organisations.

We are a member of the International Federation of Accountants and are connected globally through Chartered Accountants Worldwide and the Global Accounting Alliance. Chartered Accountants Worldwide brings together members of 15 chartered accounting institutes to create a community of more than 1.8 million Chartered Accountants and students in more than 190 countries. CA ANZ is a founding member of the Global Accounting Alliance which is made up of 10 leading accounting bodies that together promote quality services, share information and collaborate on important international issues.

We have a strategic alliance with the Association of Chartered Certified Accountants. The alliance represents more than 870,000 current and next generation accounting professionals across 179 countries and is one of the largest accounting alliances in the world providing the full range of accounting qualifications.

We employ more than 500 talented people across Australia, New Zealand, Singapore, Malaysia, Hong Kong and the United Kingdom.