

**From:** [Ian Hollingsworth](#)  
**To:** [environment policy](#)  
**Cc:** [Ross McDonald](#)  
**Subject:** Draft Greenhouse gas emissions offsets policy and technical guidelines  
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Dear

My review of the draft policy and technical guidelines, on behalf of the ALC focuses on the clarity of the guidelines. The draft policy to commit to the 2050 net zero emissions target is not being questioned by me. The technical guidelines describe direct and indirect offsetting mechanisms, which recognise benefits solely to the NT, seem parochial but that is clearly by necessity and should work in the best interests of development in the NT.

The offsetting mechanism relies on a fairly complex set of registers of direct and indirect abatement measures in the NT offsets framework, the Commonwealth Safeguard Mechanism, Climate Active Standards and contracts with R&D providers. The mechanism is difficult to follow. There is concern about accountability. A schematic, much like a quality control system schematic, that communicates offset paths, checks and approval processes would help to review and clarify the process for regulators and proponents in the next draft.

Regards

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