



Environment Institute
of Australia and
New Zealand Inc.

20/10/2021

Via email to:

environment.policy@nt.gov.au

Dear Sir/Madam,

Re: Submission to the Draft Greenhouse Gas Emissions Offsets Policy

Thank you for the opportunity to make a submission to the above policy.

The Environment Institute of Australia and New Zealand (EIANZ) represents environmental professionals working in environmental science, land management and related professional services such as cultural heritage, legal, community engagement, social science, academia and non-government organisations.

The NT EIANZ Division has a keen interest in environmental policy and legislation development and appreciates the opportunity to make a submission. In regard to the NT GHG policy EIANZ has made the following recent submissions:

- Submission to the *Greenhouse Gas Emissions Management for New and Expanding Large Emitters Policy Position Paper* February 2021
- Submission to the *Draft NT Offsets Policy* February 2020

We acknowledge the ongoing work by the NTG for continuing its work on emissions¹ management and emissions reduction in the NT.

We have reviewed the *Draft Greenhouse Gas Emissions Offsets Policy* and make the following points:

- The policy does not make it clear if scope 1, 2 and/or 3 emissions are covered by the policy.
- We feel that the draft policy clearly articulates a contemporary and pragmatic approach to offsetting emissions in the NT. Offsetting emissions is critical if the target of net zero emissions by 2050 is to be met. However, the policy is only relevant to new developments going through an environmental or statutory approval. It is critical that this, or a subsequent, policy addresses the requirements for offsetting existing emissions.
- The policy should include provisions for modifying the required offset if the project's actual emissions are different from the initial estimate. This should ensure that operators are obliged to report and offset all actual emissions, not only those estimated.
- We support the policy's emphasis on delivering maximum benefit to the Territory and note with interest the recent announcement of a consortium of CSIRO, NTG, Inpex,

¹ The definition of emissions in this submission is consistent with that in the policy

Santos and others to assess the viability of a large-scale low emissions Carbon Capture Utilisation and Storage Hub outside of Darwin. We would expect that other opportunities might need to be explored to meet the net zero emissions by 2050 target.

If required, we have no objection in our submission going public.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'JEFF RICHARDSON', written over a faint, light blue grid background.

JEFF RICHARDSON,

President, Northern Territory Division

Environment Institute of Australia and New Zealand

