Queensland Transport and Logistics Council

Reporting Freight Emissions what's needed for mandatory climate reporting and earning carbon credits

25 March 2025

ResourceIntel

Agenda

- What has changed, and why it won't it go away
- What you need to do, when, and why it's so difficult/expensive
- How you could profit from it
- Questions

Resource Intelligence

ResourceIntel

Resource Intelligence advises on Carbon strategy and practice
Carbon Intelligence audits carbon reports
Assisted entities responsible for ~40% of Australia's emissions,
Toll, Linfox, Startrack-AustPost, mid size and industrial fleets
Carbon reporting, Carbon Neutral certification, and
projects under Australian carbon offsets Methodologies

Andrew Gunst
Certified Measurement & Verification Professional
CEO, Resource Intelligence Pty Limited
www.resourceintel.com.au

Sydney Office
Level 29, Chifley Tower, 2 Chifley Square, Sydney 2000
GPO Box 3038, GPO Sydney, NSW 2001
+61 (0) 4 11 185 601 Mobile

Agenda

- What has changed, when, and why it won't it go away
- What you need to do, and why it's so difficult/expensive
- How you could earn from it
- Questions

Agenda

- What has changed, when, and why it won’t it go away

What has changed, when and why it won't it go away

- Australian Sustainability Reporting Standard (ASRS)
  - phased in over 7 years
  - three Groups
  - Scope 3 after Scope 1 & 2
  - initially Limited Assurance then Reasonable Assurance

What has changed, when, and why it won't it go away

First annual reporting periods starting on or after	Large entities and their controlled entities meeting at least two of three criteria:			National Greenhouse and Energy Reporting (NGER) Reporters	Asset Owners
	Consolidated revenue	EOFY consolidated gross assets	EOFY employees		
1 July 2024 Group 1	$500 million or more	$1 billion or more	500 or more	Above NGER publication threshold	N/A
1 July 2026 Group 2	$200 million or more	$500 million or more	250 or more	All other NGER reporters	$5 billion assets under management or more
1 July 2027 Group 3	$50 million or more	$25 million or more	100 or more	N/A	N/A

Source: treasury.gov.au brochure 'Mandatory climate-related financial disclosures'

What has changed, when, and why it won't it go away

Years commencing	Year 1*	Year 2	Year 3	Year 4**	Year 5	Year 6
Group 1	1/1/25 to 30/6/26	1/7/26 to 30/6/27	1/7/27 to 30/6/28	1/7/28 to 30/6/29	1/7/29 to 30/6/30	1/7/30 to 30/6/31
Group 2	1/7/26 to 30/6/27	1/7/27 to 30/6/28	1/7/28 to 30/6/29	1/7/29 to 30/6/30	1/7/30 to 30/6/31	1/7/31 to 30/6/32
Group 3	1/7/27 to 30/6/28	1/7/28 to 30/6/29	1/7/29 to 30/6/30	1/7/30 to 30/6/31	1/7/31 to 30/6/32	1/7/32 to 30/6/33
Governance	Limited	Limited	Limited	Reasonable	Reasonable	Reasonable
Strategy – Risks and Opportunities ***	Limited****	Limited	Limited	Reasonable	Reasonable	Reasonable
Climate Resilience Assessments / Scenario Analysis	None	Limited	Limited	Reasonable	Reasonable	Reasonable
Transition Plans	None	Limited	Limited	Reasonable	Reasonable	Reasonable
Risk Management	None	Limited	Limited	Reasonable	Reasonable	Reasonable
Scope 1 and 2 Emissions	Limited	Limited	Limited	Reasonable	Reasonable	Reasonable
Scope 3 Emissions	N/A	Limited	Limited	Reasonable	Reasonable	Reasonable
Climate-related Metrics and Targets	None	Limited	Limited	Reasonable	Reasonable	Reasonable

If any of your customers are large ->

* Group 1 entities with years commencing 1 January to 30 June will have two Year 1s.
** Years commencing from 1/7/30 to 30/6/31 for Group 3 entities. From that time reasonable assurance is required by the Act for all mandatory climate disclosures.
*** The phasing for assurance on statements that there are no material climate-related risks and opportunities would be the same as for 'Strategy – Risks and Opportunities'.
**** Only subparagraphs 9(a), 10(a) and 10(b) of AASB S2 *Climate-related Disclosures*.

What has changed, when and why it won’t it go away

- Australian Sustainability Reporting Standard (ASRS)
  - phased in over 7 years
  - three Groups
  - Scope 3 after Scope 1 & 2
  - initially Limited Assurance then Reasonable Assurance

- Safeguard Mechanism
  - Future regulatory attention on Facility boundaries may draw in transport operator emissions

What has changed, and why it won't it go away

- Federal Opposition policy to repeal ASRS, and may tone down the Safeguard Mechanism, if elected in 2025
- Who really pushes for ASRS data?
  - Community green groups and their political representatives
  - Finance sector – tonnes carbon / widget x $/tonne carbon
- Likely to be a demand regardless of any repeal if
  - Transport customer is consumer facing or needs finance
  - Transport fleet needs finance

ResourceIntel

Agenda

- What has changed, when, and why it won't it go away
- What you need to do, and why it's so difficult/expensive

What you need to do, and why it's so difficult/expensive

- The data itself – fuel volumes etc. – see David Coleman's presentation
- Your reporting boundary, and hence what emissions streams you need to report, is a matter of opinion not fact
- Scope 3 boundary is particularly 'grey'
  - Emissions embedded in vehicles and fuel
  - Employee commute, offices, staff accommodation
  - If a transport company delivers fuel, are emissions from fuel combustion within the Scope 3 boundary?
  - ?
- So, professional opinion and carefully worded (compliance audit resistant) justification documentation is key

Agenda

- What has changed, when, and why it won’t it go away
- What you need to do, and why it’s so difficult/expensive
- How you could earn from it
- Questions

How you could earn from it

- Australian Carbon Credit Units
  - for emissions intensity reductions
    - energy efficiency
    - fuel switching
  - 13,000 vehicles, since 2016
  - Five figure annual returns to fleet operators

Image: Australia Post

Image: SeaRoad

- Safeguard Mechanism Credits, if your tran s within a Safeguard Mechanism Facility

Agenda

- What has changed, when, and why it won’t it go away
- What you need to do, and why it’s so difficult/expensive
- How you could earn from it
- Questions

Thank you.

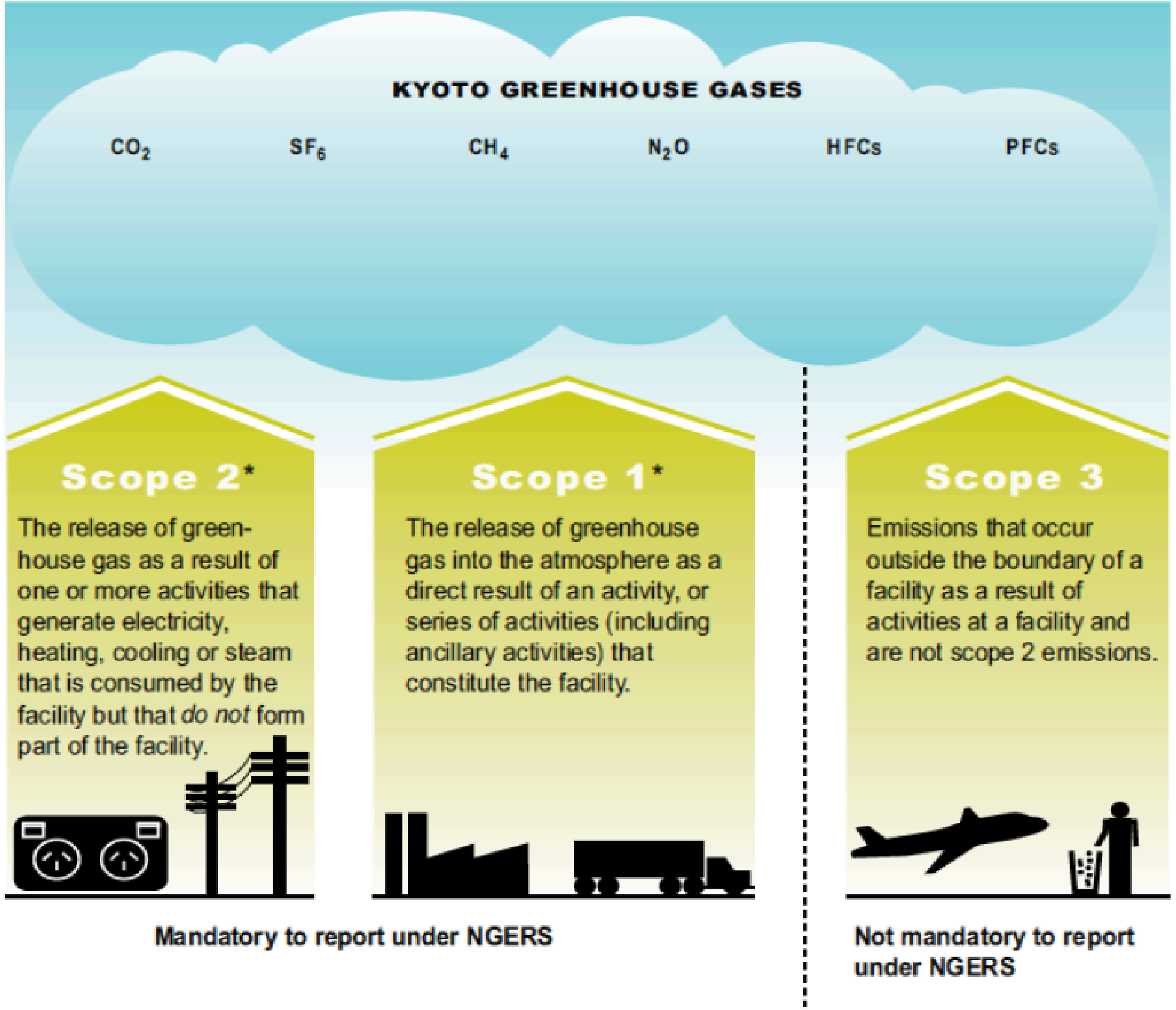
Questions?

Andrew Gunst
Certified Measurement & Verification Professional
CEO, Resource Intelligence Pty Limited
www.resourceintel.com.au

Sydney Office
Level 17, Chifley Tower, 2 Chifley Square, Sydney 2000
GPO Box 3038, GPO Sydney, NSW 2001
+61 (0) 4 11 185 601 Mobile

Additional (hidden) slides for Question Response

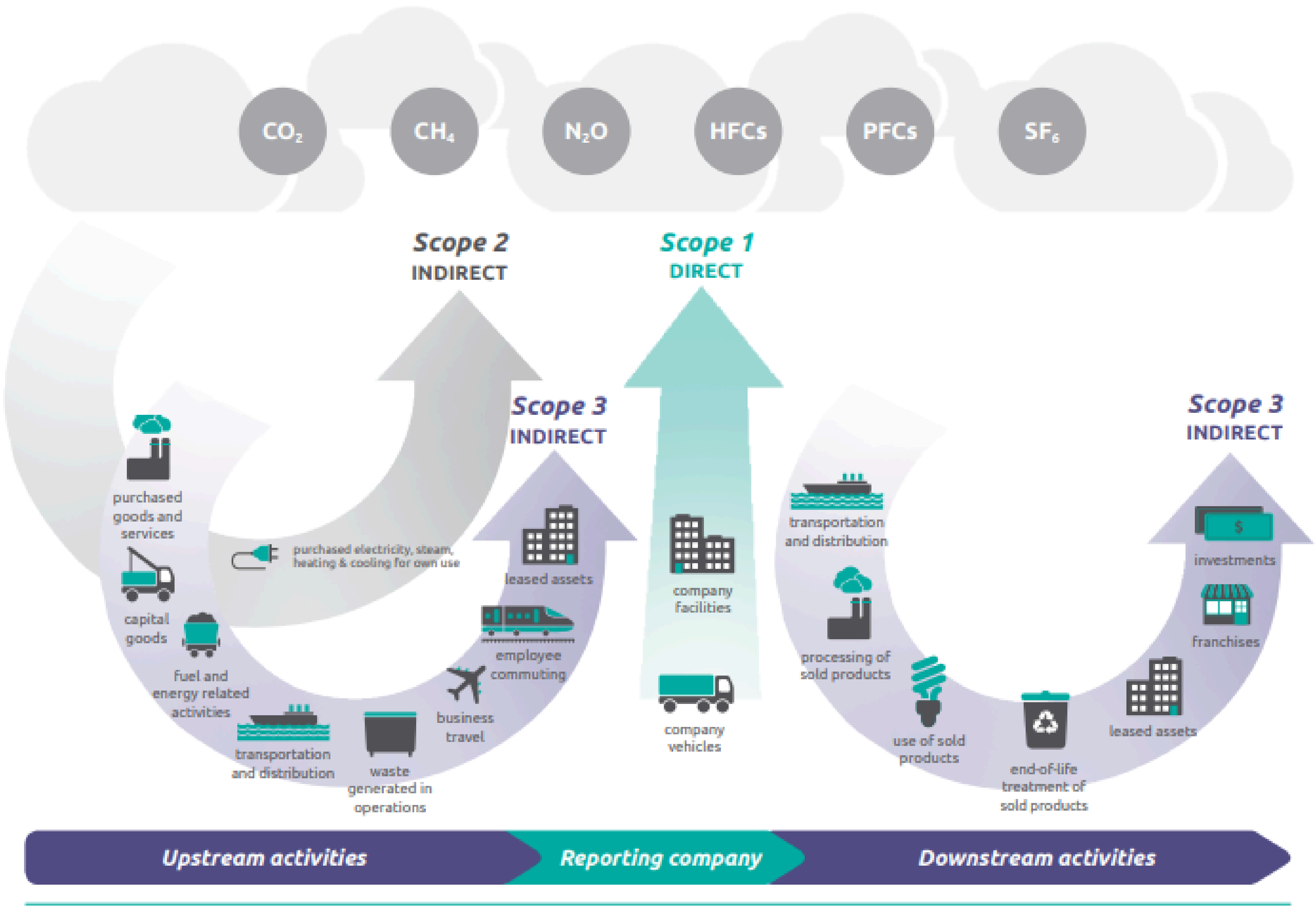
Categories of emission sources



Scope 1, Scope 2 and Scope 3 emissions

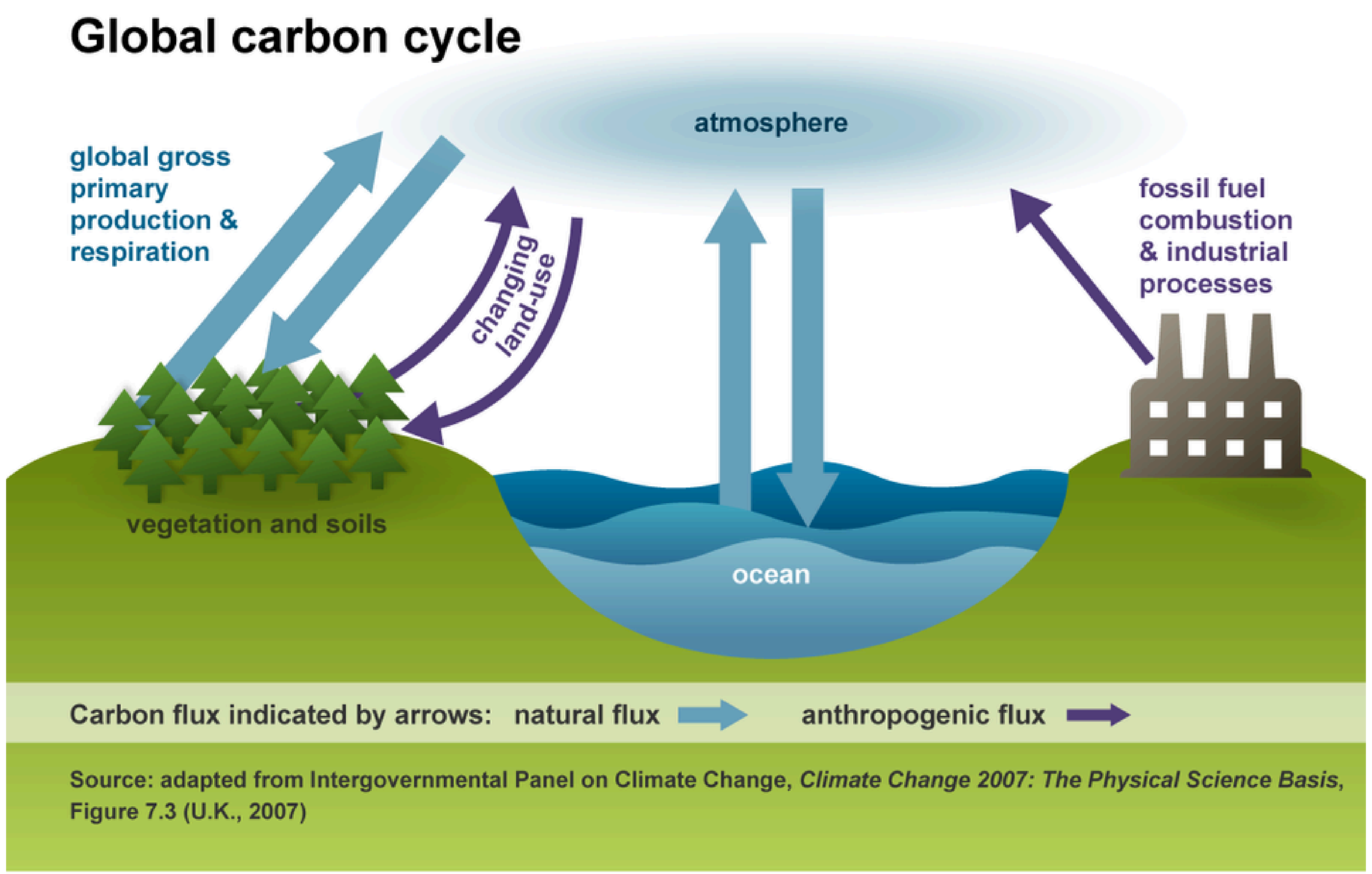
Source: Department of Climate Change

Categories of emission sources



Source: GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard

Carbon Cycle



Source: CEIA 7 December 2020

The global carbon cycle showing natural biogenic versus human caused anthropogenic emissions

Core carbon accounting principles

spar

Relevance

Accuracy

Completeness

Consistency

Source: Climate Active

Relevance test criteria

Any emission source that meets at least 2 of the 5 criteria below is assessed as relevant and is included within the emissions boundary:

Size	Risk	Stakeholders	Influence	Outsourcing
◦ **likely to be large** relative to the organisation's electricity, stationary energy and fuel emissions	◦ contribute to the organisation's **greenhouse gas risk exposure**	◦ deemed relevant by **key stakeholders**	◦ the responsible organisation could **influence emissions reductions** from that particular source	◦ **outsourced activities** previously undertaken within the organisation's boundary, or comparable organisations typically undertake these activities within their boundary

Source: Climate Active

Setting the control

- **Operational control** – most common for organisations
- **Financial control**
- **Equity share**