



# **PUBLIC DISCLOSURE STATEMENT**

**COMMONWEALTH BANK OF AUSTRALIA**

**ORGANISATION CERTIFICATION**

**FY2021-22**

Australian Government  
**Climate Active**  
**Public Disclosure Statement**



NAME OF CERTIFIED ENTITY	COMMONWEALTH BANK OF AUSTRALIA
REPORTING PERIOD	1 July 2021 – 30 June 2022 Arrears Report
DECLARATION	<p><i>To the best of my knowledge, the information provided in this public disclosure statement is true and correct and meets the requirements of the Climate Active Carbon Neutral Standard.</i></p>  <p>Jennifer Saiz Executive General Manager, Group Corporate Services 31 March 2023</p>



**Australian Government**  
**Department of Industry, Science,  
Energy and Resources**

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Version March 2022. To be used for FY20/21 reporting onwards.



# 1. CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	30,084 tCO <sub>2</sub> -e
OFFSETS BOUGHT	100% ACCUs
RENEWABLE ELECTRICITY	100%
TECHNICAL ASSESSMENT	26 November 2020 for base year (FY2019-20) Rob Rouwette Energetics Pty Ltd Next technical assessment due: FY2022-23

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## 2. CARBON NEUTRAL INFORMATION

### Description of certification

The Commonwealth Bank of Australia (CBA) is certified carbon neutral under the Climate Active Carbon Neutral Standard for Organisations for the financial year 2022 (FY22). This Public Disclosure Statement (PDS) presents our FY22 emissions estimate that covers the Australian business operations of Commonwealth Bank of Australia, as well as our offices located in Asia, Europe, and North America.

*“We are committed to sustainable business practices, in accordance with the commitments outlined in our Environmental and Social framework.”*

### Organisation description

The Commonwealth Bank of Australia (ABN 48 123 123 124) provides integrated financial services, including retail, premium, business, and institutional banking, superannuation, insurance and share-broking products and services.

CBA is an Australian multinational organisation with operations in Australia, New Zealand and offices in Asia, Europe, and North America. Our New Zealand operations (ASB) are carbon neutral, with Toitū Envirocare as a carbon neutral organisation since 2019.

Our carbon account is based on an extended “operational control” approach to establish our operational boundary and identify which emission sources need to be included. The operational control boundary covers CBA’s Australian-based operations, including Bankwest (ABN 48 123 123 124) and includes commercial and retail facilities as well as data centres. We continue to extend our boundary to assess the materiality and the inclusion of emissions sources beyond our operational control, such as the base buildings of our commercial sites, business travel activities, employees working from home, paper and courier services used by the bank.

Aussie Home Loans, which was included in CBA’s operational control boundary in previous year, merged with Lendi in May 2021, and CBA no longer has operational control over this business subsidiary. Aussie Home Loans, therefore, has been excluded from CBA’s emissions inventory from FY22.

For this carbon neutral certification, we are including our “other overseas” operations located in Asia, Europe and North America.



## 3. EMISSIONS BOUNDARY

### Inside the emissions boundary

All emission sources listed in the emissions boundary are part of the carbon neutral claim.

**Quantified** emissions have been assessed as relevant and quantified in the carbon inventory. This includes emissions for our Australian based operations (CBA and Bankwest). Emissions for our operations based in Asia, Europe and North America are **optionally** included.

Uplift factors are not applicable to our FY22 carbon inventory. Emissions associated with waste and water for retail sites have been based on a scaling approach, using the relative floor area (m<sup>2</sup> net lettable area - NLA) of our commercial sites. This is an estimation method based on extrapolation, rather than an overall uplift factor. Emissions associated with employees working from home have been based on the Work From Home emissions calculator developed for use for Climate Active submissions.

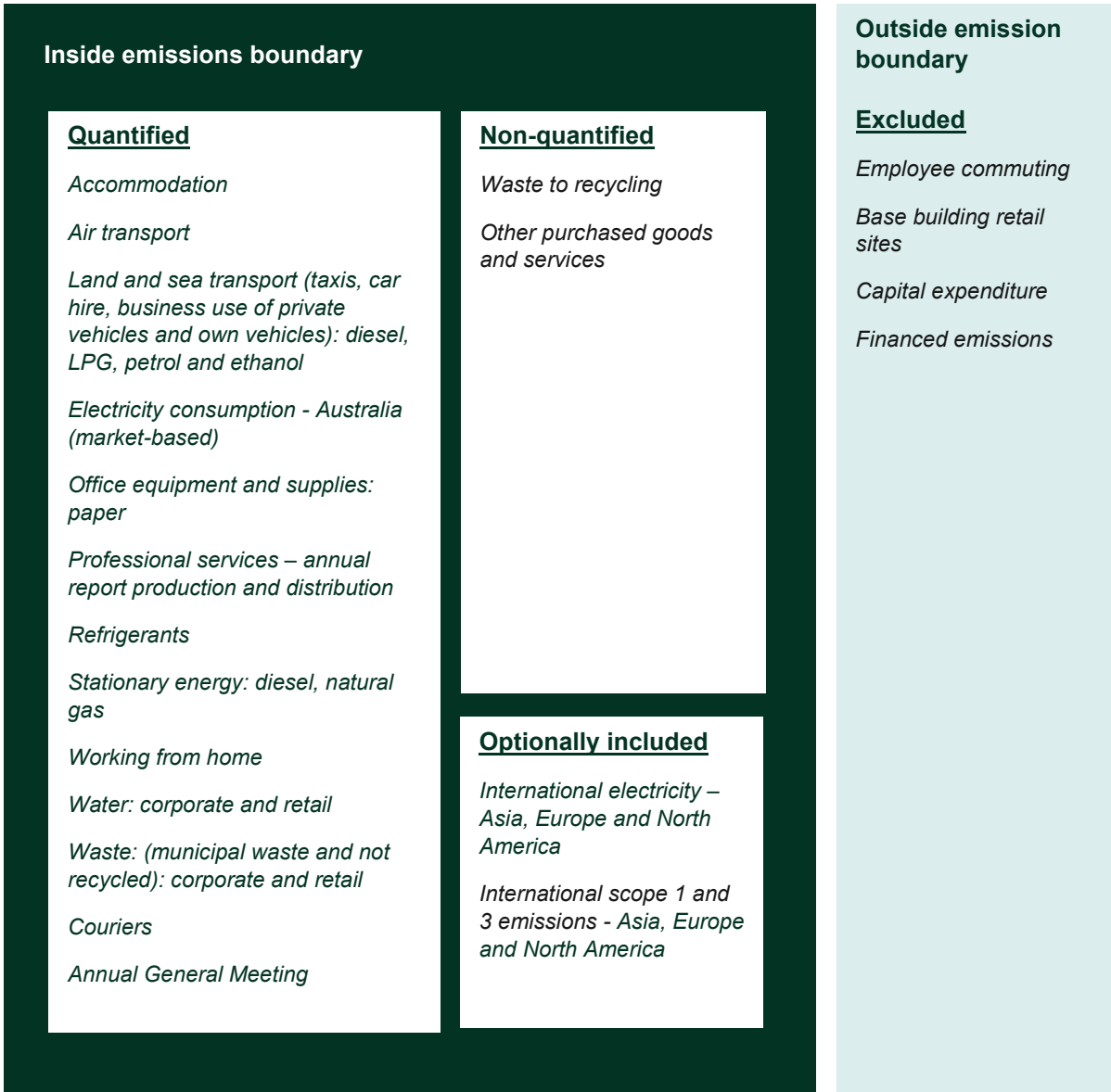
### Outside the emissions boundary (excluded emissions)

**Excluded emissions** are those that have been assessed as not relevant to an organisation's or precinct's operations and are outside of its emissions boundary or are outside of the scope of the certification. These emissions are not part of the carbon neutral claim. Further detail is available at Appendix D.

The following emission sources have been excluded in line with the provisions of the Climate Active Carbon Neutral Standard for Organisations. The exclusions are based on our organisational boundary, aligning with our peers, data limitations, materiality considerations and/or the fact that we have limited potential to influence the reduction of these scope 3 emissions from a particular source.

- Employee commuting – While CBA recognises that employee commuting is an increasingly relevant emission category on the advent of return to work programs, this category has been excluded due to current lack of data availability and our limited ability to influence our climate risk exposure. Measures and methodologies have been developed to include this category within CBA emissions boundary in the future.
- Retail sites: Base building – Base building emissions associated with our commercial sites (offices) have been quantified and included in the inventory. However, emissions associated with our base building energy use at retail sites have been excluded due to the difficulty of obtaining data (for example, we have a large number of retail sites, many without a base building), likely immaterial contribution of this emission source, and our limited ability to influence emissions reductions.
- Capital goods - While CBA recognises that there are embedded emissions associated with capital goods, emissions associated with capital expenditure have been excluded from our organisational boundary. We excluded capital goods because they are not “consumed” by our organisation. In addition, CBA has limited ability to influence the embodied emissions of buildings it occupies.
- Financed emissions - Financed emissions are not included within our inventory boundary as our carbon neutral assessment is limited to the Commonwealth Bank's operations. This approach is in

line with other financial institutions that are Climate Active carbon neutral certified. However, we recognise the importance of measuring our financed emissions and supporting our customers to reduce their emissions through our overall approach to climate change. Our 2022 [Climate Report](#) outlines our approach to supporting Australia's transition and demonstrates our progress, including further information on our financed emissions.



## Data management plan for non-quantified sources

The emission sources listed below are non-quantified in line with the provisions of the Climate Active Carbon Neutral Standard for Organisations. These decisions are based on materiality and data availability considerations. There are no non-quantified sources in the emission boundary that require a data management plan.

- Waste to recycling – We have applied a cut-off approach to waste collected for recycling. The emissions associated with recycling processes are considered part of the receiving life cycle. Emissions associated with collection (transport) of recyclables are immaterial to our footprint and have not been quantified.

Purchased goods and services – Key aspects of this category, such as business travel, couriers, emissions from the production and distribution of our annual report and the use of paper, have been assessed separately. Other categories are also being assessed for inclusion in future submissions.

## 4. EMISSIONS REDUCTIONS

### Emissions reduction strategy

Climate change is a source of both strategic financial and non-financial risks for the Group and we are committed to playing our part in limiting climate change in line with the goals of the Paris Agreement and supporting the transition to net zero emissions by 2050. We have strengthened our approach to sustainability, including updating our Environmental & Social Policy to ensure it addresses changing risks and opportunities, as well as continues to deliver value for all our stakeholders.

We are addressing our emission reductions by reducing our operational footprint through investing in technologies and practices that enable us to achieve our emissions targets. We do this through: sourcing of renewable electricity equivalent to 100 percent of our electricity needs globally by 2030, increasing on-site renewable energy generation to 2MW by 2025, maintaining operational performance of all main commercial spaces to a minimum of weighted average of 4.5 star NABERS Tenancy Energy or international equivalent, and designing new retail branches with minimum of 5 star Green Star ratings. During FY22, we updated and set new 2025 and 2030 targets informed by science. Our progress is disclosed in [2022 Annual Report](#) and [Climate Report](#).

### Emissions reduction actions

Our emissions reduction initiatives align with the emission reduction hierarchy in section 2.4 of the Climate Active Carbon Neutral Standard for Organisations. We have implemented energy efficiency initiatives, installed onsite renewable electricity generation and procured renewable electricity generated offsite for our remaining electricity use.

Our key energy efficiency initiatives include lighting, HVAC equipment and building controls upgrades. We are continually optimising our property portfolio and consolidating our commercial spaces into energy efficient precincts where feasible. Our onsite solar PV panel rollout program is expanding year on year. In FY22, we generated approximately 2,175 MWh from onsite solar PV systems. In January 2019, we commenced our 12-year power purchase agreement (PPA) with Sapphire Wind Farm, meeting 65% of our electricity requirements. In January 2020, we increased our renewable electricity procurement via several bundled green electricity contracts with retailers across the country. We have assessed our scope 2 and 3 emissions from electricity consumption from our data centres, commercial and retail portfolio, as well as our scope 3 emissions associated with base-building electricity use. In line with our RE100<sup>1</sup> ambitions, we have retired large-scale generation certificates (LGCs) against our electricity emissions. We therefore have zero net emissions for Australian electricity consumption, using the market-based approach, from the use of electricity as shown in section 7. International electricity has also been offset by local energy attribute certificates in compliance with RE100 guidelines. Where local energy attribute certificates are considered ineligible by Climate Active, additional Australian Carbon Credit Units (ACCUs) were purchased to offset these emissions.

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<sup>1</sup> RE100 is a global initiative bringing together the world's most influential businesses committed to 100% renewable electricity. See: <https://www.there100.org/>



## 5.EMISSIONS SUMMARY

### Emissions over time

In our FY22 reporting period, emissions from CBA's Annual General Meeting has been added to the boundary. The methodology to account for emissions from employees working from home has also been improved to account for employees in ACT, SA, and TAS.

Emissions in FY22 has increased by 2,572 tCO<sub>2</sub>-e compared to FY21. This increase was primarily driven by the increase in travel emissions after COVID-19 restrictions has been eased, as well as the additional emissions from employee working from home based on the improved methodology. CBA's emissions from courier services have been reduced significantly because of a change in service provider and more detailed data availability. Emissions from stationary energy (natural gas and diesel) consumption has also been reduced.

Emissions since base year		Total tCO <sub>2</sub> -e
Base year:	2018-19	142,361
Year 1:	2019-20	35,530
Year 2:	2020-21	27,512
Year 3:	2021-22	30,084

### Significant changes in emissions

The table below shows all individual emissions source that accounts for more than 5% of the emission inventory and have changed more than 5% compared to their equivalent source in FY21.

Emission source name	Current year (tCO <sub>2</sub> -e)	Previous year (tCO <sub>2</sub> -e)	Detailed reason for change
<b>Postage, courier and freight - Mailing services: parcels, postal and courier</b>	3,916	6,751	<p>This is the combination of category ID 4020 and 1150 (different activity data units were used).</p> <p>ID 4020: Australia Post is CBA's new courier services provider from FY22. They provided the calculation of their own emissions, and therefore the input-output factor based on spending is no longer used. This category is expected to increase in FY23 when Australia Post has a full 12-month of providing their courier service.</p> <p>ID 1150: Emissions from CBA's previous courier service provider, Toll, was significantly reduced because of the changeover to Australia Post. This is expected to reduce to zero in FY23.</p>

Emission source name	Current year (tCO <sub>2</sub> -e)	Previous year (tCO <sub>2</sub> -e)	Detailed reason for change
Transport (Air) - Long business class flights (>3,700km)	1,675	241	Increase in flights due to COVID-19 restriction easing
Transport (Air) - Short economy class flights (>400km, ≤3,700km)	1,809	1,063	Increase in flights due to COVID-19 restriction easing
Transport (Land and Sea) - Diesel oil post-2004 (GJ)	1,572	1,955	Usage reduction
Transport (Land and Sea) - Petrol / Gasoline post-2004 (GJ)	1,857	2,134	Usage reduction
International scope 3 emissions	1,542	1,050	Increase due to flight emissions increase
Working from home - calculator - Result A Total	10,340	5,730	CBA has updated their WFH accounting method in FY22. The current method estimates employee working from home at buildings where no swipe card data is available. Emissions from employees in ACT, SA, and TAS were also included this year using a pro-rata method.

## Use of Climate Active carbon neutral products and services

Some base buildings where CBA is a tenant are either certified as a Carbon Neutral Building, or included in the building owner's Organisation Certification in FY22.

Base building address	Certification period	Building owner / manager	PDS / Letter of intent
201 Sussex St, Sydney NSW 2000	From 18/12/2020	GPT	<a href="#">Link</a>
1 and 11 Harbour St, Sydney NSW 2000	From 21/12/2020	Lendlease	<a href="#">Link</a>
35 Tumbalong Boulevard, Sydney NSW 2000	From 21/12/2020	Lendlease	<a href="#">Link</a>
255 Pitt St, Sydney NSW 2000	From 1/7/2019	ISPT	<a href="#">Link</a>

## Organisation emissions summary

The electricity summary is available in the Appendix B. Electricity emissions were calculated using a market-based approach.

CBA's carbon inventory has been prepared in accordance with the 'Climate Active Carbon Neutral Standard for Organisations', the 'Greenhouse Gas Protocol - A Corporate Accounting and Reporting Standard'<sup>2</sup>, and the 'Greenhouse Gas Protocol – Corporate Value Chain (Scope 3) Accounting and Reporting Standard'<sup>3</sup>. Where relevant, the inventory covers all six greenhouse gases listed under the Kyoto Protocol:

- Carbon dioxide (CO<sub>2</sub>)
- Nitrous oxide (N<sub>2</sub>O)
- Perfluorocarbons (PFCs)
- Methane (CH<sub>4</sub>)
- Hydrofluorocarbons (HFCs)
- Sulphur hexafluoride (SF<sub>6</sub>)

Emission factors have been taken from the Climate Active Registered Consultant carbon inventory template version 7.2, complemented with emission factors from the National Greenhouse Accounts (NGA) Factors (August 2021), the Global Warming Potentials (GWPs) for refrigerants, and other relevant literature sources as required.

Emissions category	Sum of Scope 1 (tCO <sub>2</sub> -e)	Sum of Scope 2 (tCO <sub>2</sub> -e)	Sum of Scope 3 (tCO <sub>2</sub> -e)	Sum of total emissions (tCO <sub>2</sub> -e)
Accommodation and facilities	0	0	736	736
Electricity (total net emissions, market-based)	0	0	0	0
International electricity	0	402	53	455
International scope 3 emissions	0	0	1,546	1,546
International scope 1 emissions	583	0	0	583
Office equipment & supplies	0	0	699	699
Postage, courier and freight	0	0	3,916	3,916
Professional services <sup>4</sup>	0	0	103	103
Refrigerants	457	0	0	457
Stationary energy (gaseous fuels)	123	0	20	144
Stationary energy (base building natural gas)	0	0	1,248	1,248
Stationary energy (liquid fuels)	217	0	11	228
Transport (air)	0	0	4,039	4,039
Transport (land and sea)	3,799	0	733	4,532
Transport (fuel)	0	0	18	18
Waste	0	0	669	669
Water	0	0	370	370
Working from home	0	0	10,340	10,340
<b>Grand Total</b>	<b>5,180</b>	<b>402</b>	<b>24,503</b>	<b>30,084</b>

<sup>2</sup> Published by: World Resources Institute and World Business Council for Sustainable Development, March 2004

<sup>3</sup> Published by: World Resources Institute and World Business Council for Sustainable Development, September 2011

<sup>4</sup> Only services related to the production of the annual report are included

## Refrigerants

From FY21, all refrigerants types were summarised into a single emissions source in Climate Active Registered Consultant carbon inventory template. The table below shows individual refrigerant types used by CBA in FY22, and their associated emissions.

Refrigerant type	GWP (kgCO <sub>2</sub> -e/kg)	Consumption (kg)	Emissions (tCO <sub>2</sub> -e)
R22	1,760	49	85
R407C	1,624	35	57
R410A	1,923	131	253
R438A	2,059	9	19
R427A	2,024	18	36
R32	677	11	7
<b>Total</b>		<b>253</b>	<b>457</b>

## 6. CARBON OFFSETS

### Offsets strategy

#### Offset purchasing strategy: In arrears

1. Total offsets previously forward purchased and banked for this report	4,992
2. Total emissions liability to offset for this report (tCO <sub>2</sub> -e)	30,084
3. Total offsets required for this report	25,092
4. Total eligible offsets purchased and retired for this report	25,625
5. Total eligible offsets banked to use toward next year's report	533

### Co-benefits

CBA has sourced Australian Carbon Credit Units from the North Kimberley Fire Abatement Project (NKFAP). NKFAP consists of four independent savanna burning carbon projects:

- [Balangarra 1 Fire Project](#)
- [Dambimangari Fire Project](#)
- [Wilinggin Fire Project](#)
- [Wunambal Gaambera Unguu Fire Project](#)

The four projects' primary objectives are: supporting traditional fire management practices to protect and improve conservation outcomes; protecting cultural sites; facilitating intergenerational transmission of traditional knowledge; and providing jobs, skills and development opportunities to traditional owners. In this way, participating in the carbon market allows the NKFAP Partners to earn an income to improve the financial sustainability of fire management activities.

NKFAP projects deliver positive outcomes such as greater employment, preservation and transmission of cultural knowledge, biodiversity protection and remote community development. The North Kimberley Fire Abatement Project is Indigenous owned and operated, creates employment and income for Traditional Owners managing Indigenous cultural values and sites. Fire management activities manage important animal and plant species and their habitats.

## Eligible offsets summary

### Proof of cancellation of offset units

Offsets cancelled for Climate Active Carbon Neutral Certification										
Project description	Type of offset units	Registry	Date retired	Serial number (and hyperlink to registry transaction record)	Vintage	Eligible quantity (tCO <sub>2</sub> -e)	Eligible quantity used for previous reporting periods	Eligible quantity banked for future reporting periods	Eligible quantity used for this reporting period	Percentage of total (%)
Oriners & Sefton Savanna Burning Project	ACCU	ANREU	27 August 2021	<a href="#">8,331,697,888 – 8,331,720,827</a>	2020-21	22,940	17,948	0	4,992	17%
Balanggarra 1 Fire Project	ACCU	ANREU	6 Sept 2022	<a href="#">8,344,672,599 – 8,344,678,848</a>	2021-22	6,250	0	0	6,250	21%
Dambimangari Fire Project	ACCU	ANREU	7 Sept 2022	<a href="#">8,328,239,547 – 8,328,245,796</a>	2020-21	6,250	0	0	6,250	21%
Wunambal Gaambera Unguu Fire Project	ACCU	ANREU	7 Sept 2022	<a href="#">8,323,903,980 – 8,323,910,229</a>	2020-21	6,250	0	0	6,250	21%
Wilinggin Fire Project	ACCU	ANREU	7 Sept 2022	<a href="#">8,346,200,386 – 8,346,206,635</a>	2021-22	6,250	0	0	6,250	21%
Balanggarra 1 Fire Project	ACCU	ANREU	13 Oct 2022	<a href="#">8,344,678,849 – 8,344,679,473</a>	2021-22	625	0	533	92	0.3%
<b>Total offsets retired this report and used in this report</b>									30,084	
<b>Total offsets retired this report and banked for future reports</b>									533	
Type of offset units		Quantity (used for this reporting period claim)				Percentage of total				
Australian Carbon Credit Units (ACCU)		30,084				100%				

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07 September 2022

VC202223-00023

To whom it may concern,

**Voluntary cancellation of units in ANREU**

This letter is confirmation of the voluntary cancellation of units in the Australian National Registry of Emissions Units (ANREU) by ANREU account holder, Balanggarra Aboriginal Corporation RNTBC (account number AU-2357).

The details of the cancellation are as follows:

Date of transaction	06 September 2022
Transaction ID	AU23797
Type of units	KACCU
Total Number of units	6,250
Serial number range (ERF Project ID)	8,344,672,599 – 8,344,678,848 (EOP100650)
Vintage	2021-22
Associated ERF Project Name(s)	Balanggarra 1 Fire Project
Transaction comment	Cancelling on behalf of CBA

Details of all voluntary cancellations in the ANREU are published on the Clean Energy Regulator's website, <http://www.cleanenergyregulator.gov.au/OSR/ANREU/Data-and-information>.

If you require additional information about the above transaction, please email [registry-contact@cer.gov.au](mailto:registry-contact@cer.gov.au)

Yours sincerely,

David O'Toole  
ANREU and International  
NGER and Safeguard Branch  
Scheme Operations Division  
Clean Energy Regulator  
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[www.cleanenergyregulator.gov.au](http://www.cleanenergyregulator.gov.au)



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12 September 2022

VC202223-00026

To whom it may concern,

**Voluntary cancellation of units in ANREU**

This letter is confirmation of the voluntary cancellation of units in the Australian National Registry of Emissions Units (ANREU) by ANREU account holder, Wanjina-Wunggurr (Native Title) Aboriginal Corporation RNTBC (account number AU-2416 Dambimangari Fire Project).

The details of the cancellation are as follows:

Date of transaction	07 September 2022
Transaction ID	AU23794
Type of units	KACCU
Total Number of units	6,250
Serial number range (ERF Project ID)	8,328,239,547 – 8,328,245,796 (EOP100647)
Vintage	2020-21
Associated ERF Project Name(s)	Dambimangari Fire Project
Transaction comment	

Details of all voluntary cancellations in the ANREU are published on the Clean Energy Regulator's website, <http://www.cleanenergyregulator.gov.au/OSR/ANREU/Data-and-information>.

If you require additional information about the above transaction, please email [registry-contact@cer.gov.au](mailto:registry-contact@cer.gov.au)

Yours sincerely,

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12 September 2022

VC202223-00027

To whom it may concern,

**Voluntary cancellation of units in ANREU**

This letter is confirmation of the voluntary cancellation of units in the Australian National Registry of Emissions Units (ANREU) by ANREU account holder, Wanjina-Wunggurr (Native Title) Aboriginal Corporation RNTBC (account number AU-2466 Wunambal Gaambera Uunguu Fire Project).

The details of the cancellation are as follows:

Date of transaction	07 September 2022
Transaction ID	AU23795
Type of units	KACCU
Total Number of units	6,250
Serial number range (ERF Project ID)	8,323,903,980 – 8,323,910,229 (EOP100641)
Vintage	2020-21
Associated ERF Project Name(s)	Wunambal Gaambera Uunguu Fire Project
Transaction comment	

Details of all voluntary cancellations in the ANREU are published on the Clean Energy Regulator's website, <http://www.cleanenergyregulator.gov.au/OSR/ANREU/Data-and-information>.

If you require additional information about the above transaction, please email [registry-contact@cer.gov.au](mailto:registry-contact@cer.gov.au)

Yours sincerely,

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12 September 2022

VC202223-00028

To whom it may concern,

**Voluntary cancellation of units in ANREU**

This letter is confirmation of the voluntary cancellation of units in the Australian National Registry of Emissions Units (ANREU) by ANREU account holder, Wanjina-Wunggurr (Native Title) Aboriginal Corporation RNTBC (account number AU-2467 Wilinggin Fire Project).

The details of the cancellation are as follows:

Date of transaction	07 September 2022
Transaction ID	AU23796
Type of units	KACCU
Total Number of units	6,250
Serial number range (ERF Project ID)	8,346,200,386 – 8,346,206,635 (EOP100642)
Vintage	2021-22
Associated ERF Project Name(s)	Wilinggin Fire Project
Transaction comment	

Details of all voluntary cancellations in the ANREU are published on the Clean Energy Regulator's website, <http://www.cleanenergyregulator.gov.au/OSR/ANREU/Data-and-information>.

If you require additional information about the above transaction, please email [registry-contact@cer.gov.au](mailto:registry-contact@cer.gov.au)

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13 October 2022

VC202223-00054

To whom it may concern,

**Voluntary cancellation of units in ANREU**

This letter is confirmation of the voluntary cancellation of units in the Australian National Registry of Emissions Units (ANREU) by ANREU account holder, Balanggarra Aboriginal Corporation RNTBC (account number AU-2357).

The details of the cancellation are as follows:

Date of transaction	13 October 2022
Transaction ID	AU24284
Type of units	KACCU
Total Number of units	625
Serial number range (ERF Project ID)	8,344,678,849 – 8,344,679,473 (EOP100650)
Vintage	2021-22
Associated ERF Project Name(s)	Balanggarra 1 Fire Project
Transaction comment	Cancelling on behalf of CBA

Details of all voluntary cancellations in the ANREU are published on the Clean Energy Regulator's website, <http://www.cleanenergyregulator.gov.au/OSR/ANREU/Data-and-information>.

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[www.cleanenergyregulator.gov.au](http://www.cleanenergyregulator.gov.au)



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## 7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

### Renewable Energy Certificate (REC) summary

The following RECs have been surrendered to reduce electricity emissions under the market-based reporting method. The RECs have been surrendered to the Clean Energy Regulator under Registered Person ID 20945 – ACT, ID 20945, 22341 & 22920 – NSW, ID 125 – SA, ID 125, 11595 & 24333 – TAS, ID 37, 49, 19739 & 24090 – VIC, ID 2552, 9552 & 24741 - WA with the accreditation code, generation year and certificate serial numbers found below.

<b>1. Large-scale Generation certificates (LGCs)*</b>	84,756
<b>2. Other RECs</b>	N/A

\* LGCs in this table only include those surrendered voluntarily (including through PPA arrangements), and does not include those surrendered in relation to the LRET, GreenPower, and jurisdictional renewables.

Project supported by LGC purchase	Eligible units	Registry	Surrender date	Accreditation code (LGCs)	Certificate serial number	Generation year	Quantity (MWh)	Fuel source	Location
Sapphire Wind Farm	LGC	REC Registry	30-Jun-22	WD00NS13	15642-18352	2022	2,711	Wind	NSW, Aust.
Sapphire Wind Farm	LGC	REC Registry	30-Jun-22	WD00NS13	172367-179806	2022	7,440	Wind	NSW, Aust.
Sapphire Wind Farm	LGC	REC Registry	30-Jun-22	WD00NS13	69798-76997	2022	7,200	Wind	NSW, Aust.
Sapphire Wind Farm	LGC	REC Registry	30-Jun-22	WD00NS13	40222-47661	2022	7,440	Wind	NSW, Aust.
Sapphire Wind Farm	LGC	REC Registry	30-Jun-22	WD00NS13	10433-15641	2022	5,209	Wind	NSW, Aust.
Hampton Park - LFG - VIC	LGC	REC Registry	17-Mar-22	BEBGVC12	23431-23784	2021	354	Landfill gas	VIC, Aust.
Macarthur Wind Farm	LGC	REC Registry	17-Mar-22	WD00VC14	139978-140420	2021	443	Wind	VIC, Aust.
Cattle Hill Wind Farm	LGC	REC Registry	17-Mar-22	WD00TA12	1-1652	2021	1,652	Wind	TAS, Aust.
Silverton Wind Farm	LGC	REC Registry	17-Mar-22	WD00NS14	173969	2021	1	Wind	NSW, Aust.

Project supported by LGC purchase	Eligible units	Registry	Surrender date	Accreditation code (LGCs)	Certificate serial number	Generation year	Quantity (MWh)	Fuel source	Location
Sapphire Wind Farm	LGC	REC Registry	17-Mar-22	WD00NS13	495751-495772	2021	22	Wind	NSW, Aust.
Sapphire Wind Farm	LGC	REC Registry	17-Mar-22	WD00NS13	648008-655927	2021	7,920	Wind	NSW, Aust.
Sapphire Wind Farm	LGC	REC Registry	17-Mar-22	WD00NS13	483004-487706	2021	4,703	Wind	NSW, Aust.
Sapphire Wind Farm	LGC	REC Registry	17-Mar-22	WD00NS13	537084-541528	2021	4,445	Wind	NSW, Aust.
Sapphire Wind Farm	LGC	REC Registry	17-Mar-22	WD00NS13	533345-537083	2021	3,739	Wind	NSW, Aust.
Sapphire Wind Farm	LGC	REC Registry	17-Mar-22	WD00NS13	478246-479786	2021	1,541	Wind	NSW, Aust.
Sapphire Wind Farm	LGC	REC Registry	17-Mar-22	WD00NS13	466542-473665	2021	7,124	Wind	NSW, Aust.
Sapphire Wind Farm	LGC	REC Registry	17-Mar-22	WD00NS13	487707-489769	2021	2,063	Wind	NSW, Aust.
Sapphire Wind Farm	LGC	REC Registry	17-Mar-22	WD00NS13	719252-727435	2021	8,184	Wind	NSW, Aust.
Sapphire Wind Farm	LGC	REC Registry	21-Sep-22	WD00VC34	72028-81312	2022	9,285	Wind	VIC, Aust.
Sapphire Wind Farm	LGC	REC Registry	17-Jan-23	WD00NS13	76998-77402	2022	405	Wind	NSW, Aust.
Aegis Aged Care Melville	LGC	REC Registry	8-Mar-23	SRPVWA28	79-96	2021	18	Solar	WA, Aust.
Aegis Aged Care Melville	LGC	REC Registry	8-Mar-23	SRPVWA28	74-78	2021	5	Solar	WA, Aust.
Aegis Aged Care Parkview	LGC	REC Registry	8-Mar-23	SRPVWA25	145-169	2021	25	Solar	WA, Aust.
Aegis Aged Care Parkview	LGC	REC Registry	8-Mar-23	SRPVWA25	122-144	2021	23	Solar	WA, Aust.
Aegis Aged Care Parkview	LGC	REC Registry	8-Mar-23	SRPVWA25	102-121	2021	20	Solar	WA, Aust.
Aegis Aged Care Parkview	LGC	REC Registry	8-Mar-23	SRPVWA25	84-101	2021	18	Solar	WA, Aust.
Aegis Aged Care Parkview	LGC	REC Registry	8-Mar-23	SRPVWA25	79-83	2021	5	Solar	WA, Aust.

Project supported by LGC purchase	Eligible units	Registry	Surrender date	Accreditation code (LGCs)	Certificate serial number	Generation year	Quantity (MWh)	Fuel source	Location
Aegis Aged Care Parkview	LGC	REC Registry	8-Mar-23	SRPVWA25	65-78	2021	14	Solar	WA, Aust.
Aegis Aged Care Parkview	LGC	REC Registry	8-Mar-23	SRPVWA25	46-64	2021	19	Solar	WA, Aust.
Aegis Aged Care Parkview	LGC	REC Registry	8-Mar-23	SRPVWA25	26-45	2021	20	Solar	WA, Aust.
Aegis Aged Care Parkview	LGC	REC Registry	8-Mar-23	SRPVWA25	1-25	2021	25	Solar	WA, Aust.
Carosue Dam Southern Solar Farm	LGC	REC Registry	8-Mar-23	SRPVWAD8	650-898	2022	249	Solar	WA, Aust.
Carosue Dam Northern Solar Farm	LGC	REC Registry	8-Mar-23	SRPVWAD7	955-1208	2022	254	Solar	WA, Aust.
Carosue Dam Northern Solar Farm	LGC	REC Registry	8-Mar-23	SRPVWAD7	601-954	2022	354	Solar	WA, Aust.
MSUII - Solar - WA	LGC	REC Registry	8-Mar-23	SRPVWAC1	494-602	2022	109	Solar	WA, Aust.
MSUII - Solar - WA	LGC	REC Registry	8-Mar-23	SRPVWAC1	351-493	2022	143	Solar	WA, Aust.
MSUII - Solar - WA	LGC	REC Registry	8-Mar-23	SRPVWAC1	197-350	2022	154	Solar	WA, Aust.
BG Waters 0.14MW - Solar WA	LGC	REC Registry	8-Mar-23	SRPVWA90	47-65	2022	19	Solar	WA, Aust.
BG Waters 0.14MW - Solar WA	LGC	REC Registry	8-Mar-23	SRPVWA90	26-46	2022	21	Solar	WA, Aust.
BG Waters 0.14MW - Solar WA	LGC	REC Registry	8-Mar-23	SRPVWA90	1-25	2022	25	Solar	WA, Aust.
Sundance Scarborough Solar - WA	LGC	REC Registry	8-Mar-23	SRPVWA63	62-75	2022	14	Solar	WA, Aust.
CBH Geraldton Port - Solar - WA	LGC	REC Registry	8-Mar-23	SRPVWA57	40-53	2022	14	Solar	WA, Aust.
CBH Geraldton Port - Solar - WA	LGC	REC Registry	8-Mar-23	SRPVWA57	23-39	2022	17	Solar	WA, Aust.
CBH Geraldton Port - Solar - WA	LGC	REC Registry	8-Mar-23	SRPVWA57	1-22	2022	22	Solar	WA, Aust.
CJD - Forrestfield - WA	LGC	REC Registry	8-Mar-23	SRPVWA51	40-56	2022	17	Solar	WA, Aust.

Project supported by LGC purchase	Eligible units	Registry	Surrender date	Accreditation code (LGCs)	Certificate serial number	Generation year	Quantity (MWh)	Fuel source	Location
CJD - Forrestfield - WA	LGC	REC Registry	8-Mar-23	SRPVWA51	22-39	2022	18	Solar	WA, Aust.
CJD - Forrestfield - WA	LGC	REC Registry	8-Mar-23	SRPVWA51	1-21	2022	21	Solar	WA, Aust.
Sapphire Wind Farm	LGC	REC Registry	8-Mar-23	WD00NS13	321315-322546	2022	1,232	Wind	NSW, Aust.
<b>Total LGCs surrendered this report and used in this report</b>							<b>84,756</b>		

## APPENDIX A: ADDITIONAL INFORMATION

CBA Group's electricity consumption in Beijing, Shanghai, Hong Kong, India, and Indonesia are offset using International Renewable Energy Certificates (iRECs), Singapore using (TIGR) and the United Kingdom using Renewable Energy Guarantees of Origin (REGO).

Location	Consumption (MWh)	Certificate type	Registry	Serial number	Generation year	Fuel source	Qty
Beijing	26	iREC	Evident Registry	0000-0002-6678-8588.999999	2022	Run of River Hydro	142*
Shanghai	116						
Hong Kong	256	iREC	Evident Registry	0000-0002-6678-8588.999999	2022	Run of River Hydro	256
India	916	iREC	Evident Registry	0000-0003-0031-9563.999999	2022	Run of River Hydro	916
Indonesia	4,705	iREC	Evident Registry	0000-0002-6740-1544.999999	2022	Run of River Hydro	4,705
Singapore	25	TIGR	TIGR Registry	TIGR-1551-SG-02-07-2022-9694-53 to 77	2022	Solar	25
Singapore	30	TIGR	TIGR Registry	TIGR-1037-SG-05-06-2022-8877-1 to 30	2022	Solar	30
Singapore	5	TIGR	TIGR Registry	TIGR-1037-SG-05-07-2022-8886-33 to 37	2022	Solar	5
Singapore	55	TIGR	TIGR Registry	TIGR-1121-SG-01-07-2022-8854-1 to 55	2022	Solar	55
Singapore	94	TIGR	TIGR Registry	TIGR-1121-SG-01-07-2022-8855-1 to 94	2022	Solar	94
Singapore	39	TIGR	TIGR Registry	TIGR-1121-SG-01-06-2022-8869-1 to 39	2022	Solar	39
Singapore	82	TIGR	TIGR Registry	TIGR-1121-SG-01-06-2022-8870-1 to 82	2022	Solar	82
Singapore	14	TIGR	TIGR Registry	TIGR-1123-SG-05-06-2022-8860-1 to 14	2022	Solar	14
United Kingdom	566	REGO	Evident Registry	G01941NWSC	2022	Wind	566
United Kingdom	103	REGO	Evident Registry	G01826NWSC	2022	Wind	103
United Kingdom	542	REGO	Evident Registry	G012052NWSC	2022	Wind	542

\* The consumption in Beijing and Shanghai are cancelled together.

For all countries in the table above, iRECs, TIGR and REGO were sourced from renewable energy projects. For countries not included in the above list (Japan, Netherlands, Malta and USA), local types of offsets were available and therefore prioritised over iRECs, consistent with the GHG Protocol guidance<sup>5</sup>. Since Climate Active only accredits iRECs and REGO, additional ACCUs were procured to offset electricity used in these countries under Climate Active certification.

Location	Consumption (MWh)	Certification types	Certificates purchased	Emissions (tCO <sub>2</sub> -e)	ACCUs purchased
Japan	153	J-Credit	153	76	76
Netherlands	480	REGO	480	189	189
Malta	40	REGO	40	14	14
USA	683	REC	683	122	122
			<b>Total</b>	<b>401<sup>6</sup></b>	<b>401</b>

This accounts for the 'International electricity' category in CBA's inventory.

<sup>5</sup> [GHG Protocol scope 2 guidance](#), table 7.1, item 5.

<sup>6</sup> This total does not include the scope 3 emissions associated with electricity consumption, such as transmission and distribution losses. Total emissions from international electricity consumption are shown in the emissions summary table earlier in this document.

## APPENDIX B: ELECTRICITY SUMMARY

Electricity emissions are calculated using a **market-based approach**.

Market-based method:

Electricity emissions are calculated using a market-based approach. The market-based method provides a picture of a business's electricity emissions in the context of its renewable energy investments. It reflects the emissions intensity of different electricity products, markets and investments. It uses a residual mix factor (RMF) to allow for unique claims on the zero emissions attribute of renewables without double-counting.

Market-based approach summary			
Market-based approach	Activity Data (kWh)	Emissions (kgCO <sub>2</sub> -e)	Renewable percentage of total
Behind the meter consumption of electricity generated	2,175,617	0	2%
<b>Total non-grid electricity</b>	<b>2,175,617</b>	<b>0</b>	<b>2%</b>
LGC Purchased and retired (kWh) (including PPAs & Precinct LGCs)	84,756,000	0	79%
GreenPower	0	0	0%
Jurisdictional renewables (LGCs retired)	278,573	0	0%
Jurisdictional renewables (LRET) (applied to ACT grid electricity)	63,612	0	0%
Large Scale Renewable Energy Target (applied to grid electricity only)	19,353,845	0	18%
Residual Electricity	-941	-937	0%
<b>Total grid electricity</b>	<b>104,451,090</b>	<b>-937</b>	<b>98%</b>
<b>Total Electricity consumed (grid + non grid)</b>	<b>106,626,707</b>	<b>-937</b>	<b>100%</b>
Electricity renewables	106,627,648	0	
Residual Electricity	-941	-937	
<b>Exported on-site generated electricity</b>	<b>0</b>	<b>0</b>	
Emissions (kgCO <sub>2</sub> -e)		0	
<p><i>A minus residual electricity emissions in kgCO<sub>2</sub>-e rounds to zero because the negative emissions can only be used to reduce electricity consumption emissions. See Climate Active electricity accounting rules for further information.</i></p>			
<b>Total renewables (grid and non-grid)</b>	<b>100.00%</b>		
<b>Mandatory</b>	<b>18.47%</b>		
<b>Voluntary</b>	<b>79.49%</b>		
<b>Behind the meter</b>	<b>2.04%</b>		
<b>Residual Electricity emissions footprint (tCO<sub>2</sub>-e)</b>	<b>0</b>		
<p><i>Figures may not sum due to rounding. Renewable percentage can be above 100%. Voluntary includes LGCs retired by the ACT (MWh)</i></p>			
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Location-based method:

The location-based method provides a picture of a business's electricity emissions in the context of its location, and the emissions intensity of the electricity grid it relies on. It reflects the average emissions intensity of the electricity grid in the location (State) in which energy consumption occurs. The location-based method does not allow for any claims of renewable electricity from grid-imported electricity usage.

#### Location-based approach summary

Location-based approach	Activity Data (kWh)	Scope 2 emissions (kgCO <sub>2</sub> -e)	Scope 3 emissions (kgCO <sub>2</sub> -e)
ACT	342,186	266,905	23,953
NSW	71,283,914	55,601,453	4,989,874
SA	2,784,139	835,242	194,890
VIC	10,710,163	9,746,248	1,071,016
QLD	6,313,113	5,050,491	757,574
NT	425,897	229,985	17,036
WA	10,761,181	7,209,991	107,612
TAS	1,830,495	256,269	36,610
<b>Grid electricity (scope 2 and 3)</b>	<b>104,451,090</b>	<b>79,196,584</b>	<b>7,198,564</b>
ACT	18,353	0	0
NSW	500,666	0	0
SA	233,165	0	0
VIC	753,676	0	0
QLD	237,115	0	0
NT	25,467	0	0
WA	407,176	0	0
TAS	0	0	0
<b>Non-grid electricity (Behind the meter)</b>	<b>2,175,617</b>	<b>0</b>	<b>0</b>
<b>Total electricity consumed</b>	<b>106,626,707</b>	<b>79,196,584</b>	<b>7,198,564</b>

<b>Emissions footprint (tCO<sub>2</sub>-e)</b>	<b>86,395</b>
Scope 2 emissions (tCO <sub>2</sub> -e)	79197
Scope 3 emissions (tCO <sub>2</sub> -e)	7199

#### Climate Active carbon neutral electricity summary

Carbon neutral electricity offset by Climate Active product	Activity Data (kWh)	Emissions (kgCO <sub>2</sub> -e)
Carbon neutral base building electricity	2,650,640	0

Climate Active carbon neutral electricity is not renewable electricity. The emissions have been offset by another Climate Active member through their product certification.

# APPENDIX C: INSIDE EMISSIONS BOUNDARY

## Non-quantified emission sources

The following sources emissions have been assessed as relevant, are captured within the emissions boundary, but are not measured (quantified) in the carbon inventory. These emissions are accounted for through an uplift factor. They have been non-quantified due to one of the following reasons:

1. **Immaterial** <1% for individual items and no more than 5% collectively
2. **Cost effective** Quantification is not cost effective relative to the size of the emission but uplift applied.
3. **Data unavailable** Data is unavailable but uplift applied. A data management plan must be put in place to provide data within 5 years.
4. **Maintenance** Initial emissions non-quantified but repairs and replacements quantified.

Relevant-non-quantified emission sources	(1) Immaterial	(2) Cost effective (but uplift applied)	(3) Data unavailable (but uplift applied & data plan in place)	(4) Maintenance
Waste to recycling	Yes <sup>7</sup>	No	No	No
Other purchased goods and services	Yes <sup>8</sup>	No	No	No

<sup>7</sup> The emission factor for waste to recycling is zero.

<sup>8</sup> The "Other purchased goods and services" category is outside the boundary of our organisational footprint, as outlined in section 3. Nonetheless, this category is listed here for completeness.

# APPENDIX D: OUTSIDE EMISSIONS BOUNDARY

## Excluded emission sources

The below emission sources have been assessed as not relevant to an organisation's or precinct's operations and are outside of its emissions boundary. These emissions are not part of the carbon neutral claim. Emission sources considered for relevance must be included within the certification boundary if they meet two of the five relevance criteria. Those which only meet one condition of the relevance test can be excluded from the certification boundary.

Emissions tested for relevance are detailed below against each of the following criteria:

1. **Size** The emissions from a particular source are likely to be large relative to the organisation's electricity, stationary energy and fuel emissions
2. **Influence** The responsible entity has the potential to influence the reduction of emissions from a particular source.
3. **Risk** The emissions from a particular source contribute to the organisation's greenhouse gas risk exposure.
4. **Stakeholders** Key stakeholders deem the emissions from a particular source are relevant.
5. **Outsourcing** The emissions are from outsourced activities previously undertaken within the organisation's boundary, or from outsourced activities typically undertaken within the boundary for comparable organisations.

Emission sources tested for relevance	(1) Size	(2) Influence	(3) Risk	(4) Stakeholders	(5) Outsourcing	Included in boundary?
Employee commuting	Yes	Yes	No	No	No	No
Retail sites: Base building	No	No	No	No	No	No
Capital goods	No	No	No	No	No	No
Financed emissions*	Yes	Yes	Yes	Yes	No	No

\*Financed emissions are outside of our operational and/or financial control, and therefore are excluded from our organisational footprint. This approach is in line with other financial institutions that are Climate Active carbon neutral certified. We have reported financed emissions as "excluded" for maximum transparency.



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