

signatory annual report
self-audit checklist

July 2019



Australian
Carbon Industry
Code of Conduct
SIGNATORY



Carbon Industry Code of Conduct

Annual Report

The annual report is a self-audit checklist that Signatories are required to complete and return to the Code Administrator at the end of each financial year.

The annual report serves as confirmation of a Signatory's compliance with the Code throughout the year, and serves to reaffirm the Signatory's ongoing commitment to implementing the Code for the subsequent financial year.

During the Foundation Stage, the Code Administrator will review each Signatory's compliance through review of the annual report. Following review of the annual report, the Code Administrator may request further information from Signatories.

Signatories must complete the annual report by 1 August following the end of each financial year.

Signatories have the option of completing the annual report using one of two methods:

- 1. Filling in the self-audit checklist¹ below or online, which can be printed or filled out online on the Code website, and submitted to the Code Administrator by the reporting date, or;**
- 2. Completing and submitting their own company annual report, which follows the annual report guidelines below, by the reporting date.**

¹ Signatory's may print and complete the Signatory Annual Report and return it to the Code Administrator via Code.Administrator@carbonmarketinstitute.org. A link to completing the self-audit checklist online will be provided by the Code Administrator via email prior to the end of the financial year.



1. Annual Report Online Form

Signatory details

Signatory ID	
Compliance year	2018/19

Project details

Have you been contractually involved with any Carbon Offset Projects² or ERF Projects³ during the compliance year?	Yes / No
If yes, what is the total number of ERF projects?	
If yes, what is the total number of Carbon Offset Projects?	
If yes, what is the total intended volume of abatement in tonnes of carbon dioxide equivalent (tCO₂-e) stored or avoided by the project(s) you have been contractually involved with over the past 12 months (if known)	
If yes, list the associated method(s) or project type(s)	
If yes, list the project location(s) associated with your project(s)	

Project Requirements Checklist

Please complete the following checklist and provide comment, where relevant. **This checklist will cover all the projects that you have listed in the project details section above.**

If you answer “No” to any of the items in the checklist description, you must:

- provide a comment explaining why this is the case, and;
- state how many of the projects, listed in the project details section above, this comment is associated with.

A description of any attachments in support of this checklist should be provided at the end of this table and submitted with the checklist.

If you answer “N/A” to any of the items in the checklist description, you must:

- provide a comment as why the checklist description does not relate to your carbon industry business activities as a Signatory to the Code.

² As defined by Appendix 1 Section 1(7) of the Code.

³ As defined by Appendix 1 Section 1(25) of the Code.



Item	Description	Y	N	N/A	Comments
A	Pre-project activities				
	<i>Communication with clients</i>				
A.1	Signatory has provided the client with sufficient, accurate information, prior to project registration, allowing them to make informed decisions about whether to undertake a Carbon Offsets Project, and enter into an agreement with the Signatory.				
	<i>Advice on project development models for Carbon Offsets Projects</i>				
A.2	Signatory has informed client of the different project development models for undertaking a Carbon Offsets Project and discussed the preferred project development model with clients (including costs, benefits and risks over the lifecycle of the project for that model).				
	<i>Advice on project ownership</i>				
A.3	Signatory has confirmed that the client has the legal right for the project, including both the ability to carry out the project and the exclusive right to receive any carbon credits generated by the project.				
A.4	The legal right has been transferred to the entity who will be the scheme participant, (if required and where appropriate)				
A.5	Signatory has ensured that the existing legal right holder has had access to independent legal advice on their rights, interests and effect of a transfer of legal rights.				
A.6	If the project occurs on native title land, the Signatory has undertaken appropriate due diligence prior to project registration.				
A.7	Signatory has ensured that consent from all eligible interest consent holders associated with the project will be obtained in a timely manner in accordance with the requirements of the CFI Act.				
	<i>ERF Information: Method requirements and project administration</i>				
A.8	Signatory has provided relevant information to the client on the ERF Methods applicable to the project.				
A.9	Signatory has provided information to the client regarding the administrative and compliance requirements associated with undertaking an ERF project.				



Item	Description	Y	N	N/A	Comments
A.10	Signatory has provided information to the client concerning the ability to vary and end projects, including the associated implications (if relevant).				
A.11	Signatory has provided advice to the client on relinquishment triggers and revocation triggers, and the implications (if relevant).				
A.12	Signatory has provided the client with specific information in relation to undertaking a sequestration project under the ERF.				
A.13	Social, environmental and economic co-benefits have been considered by the Signatory in the planning and implementation of the project.				
A.14	Signatory has provided ongoing advice to ensure that the client understands the compliance requirements associated with the relevant ERF Method.				
A.15	Signatory has informed the client of the offset reporting requirements under the CFI Act, ERF Method or other scheme.				
	<i>Advice on carbon credit sales and markets</i>				
A.16	All feasibility advice provided by the Signatory complies with the Australian Financial Services Licensee (AFSL) requirements under the Corporations Act.				
A.17	In providing estimates of carbon credit generation: - The Signatory has provided full disclosure on; assumptions made, the source or method used to calculate estimates, and risks and uncertainties inherent in those assumptions.				
	- The Signatory has accounted for and disclosed the impact of applicable abatement buffers or discounts under the CFI Act or ERF Method which may reduce the number of carbon credits that can be claimed based on the net abatement achieved by the project.				
A.18	The Signatory has provided information to clients for ERF projects regarding crediting periods				
A.19	The Signatory provided the client with appropriate and relevant information, and support to enable the establishment of an Australian National Registry of Emissions Units (ANREU) account (if required).				



Item	Description	Y	N	N/A	Comments
A.20	Signatory informed client of the relevant options available for the sale of carbon credits.				
A.21	Signatory has informed the client whether they hold an AFSL, and the implications of this in relation to the level of financial advice that can be provided.				
A.22	The Signatory has disclosed to the client any interest or benefit the Signatory has in a carbon credit sales option.				
A.23	The Signatory, following disclosure to the client of its financial interest in the project, has recommended that the client obtains independent legal and/or financial advice.				
A.24	Where the client is entering into a Carbon Abatement Contract with the Clean Energy Regulator in relation to a Carbon Offsets Project, the Signatory has explained to the client the associated financial risks and the implications of non-delivery under the contract.				
B	<i>Project management</i>				
B.1	Signatory has developed a written project management plan in consultation with the client and other relevant stakeholders, that addresses all project obligations and responsibilities, and compliance requirements applicable to the project.				
B.2	Relevant project risks have been identified and the Signatory has informed the client, as far as possible, of these risks and how they can best be managed.				
B.3	Signatory has provided the client with a summary of the type of information and records that will be required for reporting and audit purposes.				
B.4	Signatory has advised the client, where relevant, that the project will be subject to mandatory audit and has explained the processes involved.				
B.5	Signatory has developed written policies and processes for maintaining appropriate records that supports compliance with the record keeping requirements under the CFI Act, ERF Method or other scheme.				
B.6	Signatory has maintained appropriate records in a manner that are easily accessible for audit or other reporting and information purposes.				



Item	Description	Y	N	N/A	Comments
B.7	Signatory has a written policy for identifying and consulting with relevant stakeholders.				
B.8	The Signatory has communicated relevant and accurate information about the project to all stakeholders, including client, government agencies and other relevant parties.				
B.9	Signatory has maintained regular contact with clients to identify whether the plan is being followed and that any issues arising are addressed in a timely and efficient manner.				
D	General Requirements				
D.1	There is a written agreement between the Signatory and the client that is expressed in a clear and transparent way, using plain English language.				
D.2	Signatory has provided the client with information about the Code of Conduct (including the process for providing feedback and lodging complaints) and relevant ERF guidance material.				
D.3	Signatory has an appropriate internal complaints handling process that is fair, efficient and transparent.				
C	Compliance				
C.1	Signatory has ensured that the project being undertaken complies with the Carbon Industry Code of Conduct, and the Signatory can demonstrate compliance with the Code to the satisfaction of the Code Administrator and provide appropriate evidence of compliance (e.g. documented procedures; discussion of standard practices; examples of documentation given to clients, such as ERF Guides).				
C.2	Signatory has ensured that the project being undertaken complies with all local, state and federal legislation.				
C.3	Signatory has undertaken appropriate due diligence to determine whether an AFSL is required for their business activities, in consideration of the requirements of the Corporations Act and relevant ASIC Regulatory Guides.				



Complaints & Breaches Checklist

Please complete the following checklist and provide comment, where relevant. This checklist will cover all the projects that you have listed in the project details section above.

If you answer “No” to any of the items in the checklist description, and are not directed to another question, you must:

- provide a comment explaining why this is the case, and;
- state how many of the projects, listed in the project details section above, this comment is associated with.

A description of any attachments in support of this checklist should be provided at the end of this table and submitted with the checklist.

If you answer “N/A” to any of the items in the checklist description, you must provide a comment as why the checklist description does not relate to your carbon industry business activities as a Signatory to the Code.

Item	Description	Y	N	N/A	Comments
A	Complaints				
A.1	Has the Signatory received any complaints against them in the compliance year?				
A.1a	If no, please go to Item B .				
A.2	How many complaints were received?				
A.3	Did the Signatory notify the Code Administrator upon receiving the complaint(s)?				
A.4	Did the complaint(s) get lodged with a relevant body (e.g. the Regulator, Department, Ombudsman or consumer affairs authority) by the complainant?				
A.5	Are any of the complaints unresolved?				
A.5a	If no, please move to Item B .				
A.6	Describe the nature and status of the unresolved complaint(s)				
B	Breaches				
B.1	Has the Signatory been in breach of the Code during the compliance year?				
B.1a	If no, your checklist is complete .				
B.2	Which sections of the Code did the Signatory breach?				
B.3	Provide details of why the Signatory was in breach of the Code?				
B.4	Is the Signatory still in breach of the Code?				
B.4a	If no, your checklist is complete .				
B.5	Provide details of the proposed plan(s) to rectify the breach.				



Documentation

Please provide any additional information you wish to provide in support of your response to the checklists, and select which checklist your attachment relates. Please note that the Code Administrator may request additional information.

Please describe the information that has been provided to support your checklist and attach to the submission.

↳	Attachment Title	Attachment Description
A		
B		
C		

+Add additional rows as required.



Declaration and Reaffirmation Checklist

Signatory Declaration	
As a signatory to the Carbon Industry Code of Conduct, [I/we] attest to having met the requirements of the Code for all projects, as defined by the Code, which have been undertaken in the previous 12 months. [I am/We are] committed to developing and conducting business in line with industry best practice and interacting with clients and other stakeholders in a professional and ethical manner.	
As such, [I/we] attest that all projects covered by this compliance declaration period have:	
<ul style="list-style-type: none"> • Been undertaken in a transparent and accountable manner; • Ensured environmental and social integrity of the scheme; • Complied with applicable legislation and regulations; and • Facilitated community trust in the outcomes of the scheme. 	
[I/We] confirm that [I/we] have taken reasonable steps to avoid any actions, omissions or business practices that could damage the reputation of the carbon industry or may adversely impact on the achievement of the objectives or vision of the Carbon Industry Code of Conduct.	
In signing this Annual Report, [I/we] reaffirm(s) [my/our] ongoing commitment to implementing the Code.	
Name (print full name)	
Signature (attach electronic signature)	
Date (dd/mm/yyyy)	

The Code Administrator may need to contact you to seek more information on the information detailed in your Annual Report.

If you have any other information you wish to provide, please forward it to Code.Administrator@carbonmarketinstitute.org.

Please note it can take up to 5 business days for a response. We will endeavour to get back to you as soon as possible.



2. Company Annual Report

Company Annual Report Guidelines

If you choose to provide confirmation of your compliance with the Code through the submission of your own annual report you must follow the guidelines below.

Signatories should be aware that if the information provided in your annual report does not adequately satisfy the Code Administrator of your compliance with the Code, you will be asked to provide additional information or complete the self-audit checklist above.

Guidelines 1-11 below must be followed:

1. The company annual report must be submitted to the Code Administrator at Code.Administrator@carbonmarketinstitute.org by 1 August following the end of each financial year.
2. You must provide a detailed and comprehensive description of your carbon industry business activities, specifically your interaction with clients, to allow the Code Administrator to determine your compliance with the Code under the information submitted for Guideline 3.
3. The annual report must provide the following statistics:
 - a. The total number of ERF projects the Signatory has been contractually involved with during the compliance year;
 - b. The total number of Carbon Offset Projects the Signatory has been contractually involved with during the compliance year;
 - c. The total intended volume of abatement in tonnes of carbon dioxide equivalent (tCO₂-e) stored or avoided by the project(s) you have been contractually involved with over the past 12 months (if known);
4. The company annual report must provide sufficient information to demonstrate that the Signatory has met the requirements outlined in the Annual Report Online Form specifically items A, B, C and D.
 - a. If you have not met one or more items under A, B, C and D above, you must:
 - i. provide a comment within or attached to your company annual report explaining why this is the case, and;
 - ii. state how many of the projects, listed in Guideline 3, the above comment(s) is associated with.
 - b. If you believe one or more items under A, B, C and D above are not applicable to you as a Signatory to the Code, you must:
 - i. provide a comment within or attached to your company annual report as to why the particular item does not relate to your carbon industry business activities.
5. The company annual report must provide sufficient information to demonstrate whether the Signatory has:
 - a. received any complaints against them in the compliance year, and if so;
 - i. how many complaints were received.
 - ii. if the Signatory notified the Code Administrator upon receiving the complaint(s) in accordance with the Code;
 - iii. if the complaint(s) were lodged with a relevant body (e.g. the Regulator, Department, Ombudsman or consumer affairs authority) by the complainant;
 - iv. if any of the complaints are still unresolved;
 - a. and if so, described what the nature and status of the unresolved complaint(s) is/are.



- b. been in breach of the Code during the compliance year, and if so;
 - i. which sections of the Code were breached;
 - ii. described why the Signatory was in breach of the Code;
 - iii. if the Signatory is still in breach of the Code;
 - a. and if so, details of the proposed plan(s) to rectify the breach.
6. The Signatory must provide a description of any attachments to their company annual report, in support of their compliance to the Code, and submit this with their annual report at the same time.
7. Signatories must attach the Declaration and Reaffirmation Checklist above, to their company annual report, reaffirm the Signatory's ongoing commitment to implementing the Code for the subsequent financial year.
8. Further guidance may be provided by the Code Administrator throughout the compliance year.

for more information please contact

The Code Administrator
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+61 (03) 8601 1640



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