

**CODE OF CONDUCT
CONSULTATION PAPER**

Congestion Busting and Information Sharing

March 2021



Australian
Carbon Industry
Code of Conduct



1. Background

Commencing on 1 July 2018, the Australian Carbon Industry Code of Conduct (the Code) aims to:

- 1) define industry best practice for project developers, agents, aggregators and advisers in Australia’s carbon projects industry;
- 2) promote consumer protection and appropriate and open interaction with project owners and landowners;
- 3) provide guidance to scheme participants; and
- 4) promote market integrity, accountability and display international leadership in carbon project development.

In 2020, an Independent Review of the Australian Carbon Industry Code of Conduct was undertaken, from which 46 recommendations to the Code Administrator were made. As part of the Code’s operational transition, the Administrator is proposing updates to the Code text and related frameworks and will consult with stakeholders on these changes early in 2021. During consultations, the Administrator will welcome feedback on any/all potential options and will use these reflections to form a final position that will be announced in May 2021. Relevant changes will be incorporated into updated Code text and guidance materials to be shared with stakeholders well in advance of coming into effect on 1 July 2021.

This consultation paper has been developed to address recommendations 14-16, and 19-21 regarding reducing regulatory and administrative burden and improving information sharing arrangements, with specific recommendations relating to:

- Recognition of a Signatory’s AFSL obligations when monitoring a Signatory’s compliance with the Code (Section 3.4);
- Specific overlapping Code obligations not being applicable for Signatories acting as ERF project proponents under the CFI Act (Code Section 2.3);
- Development of the Administrator’s internal capabilities to access and understand information on a Signatory’s compliance obligations under regulatory regimes (general);

Each recommendation is outlined below, along with the Administrator’s initial response communicated to stakeholders in 2020. These below responses underpin the approach to proposed changes laid out later in this consultation paper.

| Independent Review Recommendations 14 15 16 19 20 21 | |
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| Review Recommendation | Administrator’s 2020 Response to Review |
| <p>14. It is recommended that the Code Administrator be given the discretion to recognise and rely on the business practices and compliance measures a Signatory has implemented to meet its AFSL obligations, subject to the Signatory demonstrating:</p> <ul style="list-style-type: none"> • the applicability of its AFSL to its carbon project customers; • the duplication of its AFSL and Section 2 obligations and monitoring; • the quality of its business practices; and • the effectiveness of its compliance measures. | <p>Approved In-Principle</p> <p>The Administrator supports implementation of this activity, however will consult with Signatories and with ASIC in the initial 12-month transitional period of the Operational Stage to understand the form and function of such discretion and its application for Signatory compliance and reporting.</p> <p>The Administrator will modify internal Code compliance systems, processes and any relevant articles in the Code text to be updated and implemented for compliance from 1 July 2021.</p> |



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| <p>Whilst this recommendation pertains to Section 2 of the Code, it can be effected via an amendment to Section 3.4.</p> | |
| <p>15. When applicable, it is recommended that the Code Administrator and Signatory review the above arrangement annually, or in the event that the Signatory ceases to be licensed, whichever is the earliest. This can be implemented by an amendment to section 3.4.</p> | <p>Approved In the context of the Administrator's response to Recommendation 14, the structure of this review process will be provided to Signatories well in advance of implementation for the 1 July 2021 compliance year.</p> |
| <p>16. It is recommended that the Code Administrator develop the capabilities necessary to support its discretionary role in determining the relevance and effectiveness of Signatory's AFSL compliance measures.</p> | <p>Approved The Administrator will develop capabilities as required to ensure effective implementation of decisions regarding Recommendations 14 and 15.</p> |
| <p>19. It is recommended that Section 2.3 clarify that where the Signatory is an ERF proponent for a project, the overlapping Code obligations of Section 2.3(3) and (4) are not applicable in relation to the particular project/s. Signatories who are project proponents in the ERF are already required to comply with the offset reporting, audit and record-keeping requirements under the Carbon Farming Initiative (CFI) Act. Duplication of these obligations for Signatories acting as ERF proponents for some or all projects is not necessary.</p> | <p>Approved The Administrator will modify internal compliance systems and the relevant articles in the Code text to be updated and implemented for compliance from 1 July 2021.</p> |
| <p>20. It is recommended that the Code Administrator should focus its compliance monitoring activities on any residual Code requirements that are not already covered by the CFI Act and subordinate legislation in order to reduce administrative burden for both the Code Administrator and the relevant Signatory.</p> | <p>Approved The Administrator will review and modify relevant articles in the Code text to be updated and implemented for compliance from 1 July 2021. The Administrator will also consider how it might enter into more formal information sharing arrangements with the Clean Energy Regulator (CER) where possible to reduce the administrative burden on signatories in its compliance with both the Code and CER processes.</p> |
| <p>21. It is recommended that the Code Administrator refer to the ERF project and contracts registers published on the Clean Energy Regulator's website where possible to minimise administrative burden on clients¹. The Code Administrator should request the Clean Energy Regulator to consider making available project</p> | <p>Approved Given the Code is applicable to ACCU-generating and non-ACCU generating activities, the Administrator will also consider the extent to which it is appropriate to refer to other voluntary market contract, project, or unit registries, such as those managed by the Gold Standard, VERRA, or the UNFCCC Clean Development Mechanism (CDM).</p> |

¹ Recommendation 21 of the Independent Review refers to 'clients' when this should be 'Signatories'.



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| <p>data to facilitate the automation of Signatory Annual Reports to the Code Administrator.</p> | <p>This will be considered in the context of consumer protection relating to more demand-side focused Signatories.</p> <p>The Administrator will also consider how it might enter into more formal information sharing arrangements with the Clean Energy Regulator (CER) where possible to reduce the administrative burden on signatories in its compliance with both the Code and CER processes.</p> |
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2. Consideration of Recommendations 14 | 15 | 16 | 19 | 20 | 21

The Code Administrator provided a response to each recommendation following a consultation on the review recommendations which received 8 submissions. Submissions made to the Independent Review by Signatories and stakeholders in May and June 2020 revealed support for Recommendations 14-16 and 19-21, noting some issues and considerations, as below:

- Recommendation 15 | 19 | 21: Submissions supported these recommendations.
- Recommendation 14: Submissions expressed support for the Code Administrator to recognise and rely on AFSL obligations to reduce regulatory and compliance burden. However, submissions also called for more clarity on how Signatories would be assessed to be demonstrating the qualities the Administrator would be looking for.
- Recommendation 16: Submissions supported this recommendation, noting that this capability could be significant, and that Code Administrator staff could undertake training courses that AFSL holders are required to provide to authorised representatives.
- Recommendation 20: Submissions supported this recommendation, noting that the Administrator must ensure that the recommendation enables for best practice standards (beyond the CFI Act) to be upheld; and that Signatories would benefit from more guidance from the Administrator.

The view of the Code Administrator is that reducing regulatory burden for Signatories should be pursued by the Code where appropriate, but that these efforts should not create both unacceptable Code risks and excessive administrative burden to the Administrator or Signatories. Considerations include that:

- In addition to Signatories obligations under the Corporations Act for financial services activities, and the CFI Act where Signatories are the project proponent, the Code Administrator will also investigate opportunities to reduce regulatory and administrative burden for Signatories engaging with voluntary schemes (e.g. Gold Standard, VERRA).
- Reduction in regulatory burden for Signatories for certain parts of the Code, will allow the Administrator to focus compliance monitoring efforts on other aspects of a Signatory’s obligations under the Code. This will reduce administrative burden for the Administrator, resulting in a more targeted approach to compliance monitoring.
- Additional information on a Signatory’s compliance activity under these regimes will be required e.g., Signatory relationship with projects, including evidence on which projects a Signatory is a designated project proponent or not.
- Information sharing arrangements will be pursued with these regimes to reduce administrative burden.
- The Administrator will develop its capability in understanding and assessing compliance related information under these regulatory regimes.



- The Administrator will provide further guidance on how it assesses the coverage of compliance under these regulatory regimes including how administrative burden for Signatories and the Administrator can be minimised. E.g., certain questions in Signatory annual reporting not being applicable and/or pre-filling of certain Signatory information.

The Administrator proposes draft positions to implement for Recommendations 14-16 and 19-21, based on submissions to the Review received from stakeholders, and further investigation of these and related issues by the Code Administrator. These considerations and draft positions are neither decisive nor exhaustive and are presented as a basis for discussion.

3. Proposed Options for Consultation

3.1 Reducing Regulatory Burden for AFSL Holders

Recommendations 14, 15, and 16 suggests that the Code Administrator recognise a Signatory’s AFSL obligations when monitoring Signatories’ compliance with the Code. These recommendations do not state that certain Code sections are ‘not applicable’, but rather that the Administrator can focus compliance monitoring on other aspects of a Signatory’s obligations under the Code if satisfied that overlapping obligations have already been met.

The view of the Administrator is that assessments can be made to determine that a Signatory’s AFSL obligations can be relied upon when monitoring Signatories’ compliance with the Code. To support these assessments Administrator staff will undergo training on a Signatory’s AFSL compliance measures.

The Administrator proposes the following amendments to Code text to enable the Administrator to recognise a Signatory’s AFSL obligations when monitoring Signatories’ compliance with the Code.

| Current Code Text | Proposed Code Text |
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| <p>3.4 Compliance and Auditing</p> <p>(1) The Code Administrator has put in place arrangements for monitoring Signatories’ compliance with the Code to ensure it delivers the desired outcomes. Signatories must agree to comply with the requirement for regular monitoring and to allow audits on their compliance with the Code.</p> <p>(2) The Code Administrator will carry out the following monitoring and auditing measures and assess ongoing compliance with the Code through:</p> <p>(a) audit compliance checks;</p> <p>(b) assessing feedback from clients obtained through client satisfaction surveys;</p> <p>(c) investigating cases it is aware of in which Signatories may have breached the Code;</p> <p>(d) using information obtained from media reports;</p> <p>(e) using information received from other Signatories; and</p> | <p>3.4 Compliance and Auditing</p> <p>(1) The Code Administrator has put in place arrangements for monitoring Signatories’ compliance with the Code to ensure it delivers the desired outcomes. Signatories must agree to comply with the requirement for regular monitoring and to allow audits on their compliance with the Code.</p> <p>(2) The Code Administrator will carry out the following monitoring and auditing measures and assess ongoing compliance with the Code through:</p> <p>(a) audit compliance checks;</p> <p>(b) assessing feedback from clients obtained through client satisfaction surveys;</p> <p>(c) investigating cases it is aware of in which Signatories may have breached the Code;</p> <p>(d) using information obtained from media reports;</p> <p>(e) using information received from other Signatories; and</p> |



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| <p>(f) using information obtained from any additional sources.</p> | <p>(f) using information obtained from any additional sources.</p> <p>(3) With regards to requirements set out in (1) and (2) above, the Code Administrator may use information on the business practices and compliance measures a Signatory has implemented to meet its AFSL obligations, subject to the Signatory demonstrating:</p> <p>(a) the applicability of its AFSL to its Code requirements;</p> <p>(b) the duplication of its AFSL obligations and Code requirements;</p> <p>(c) the alignment of business practices reported under the Code and its AFSL obligations; and</p> <p>(d) evidence of compliance with AFSL obligations.</p> <p>(4) With regards to (3) above, the Code Administrator and Signatory review the above arrangement annually, or in the event the Signatory ceases to be licensed, whichever is the earliest.</p> |
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The Administrator will develop guidance on how it will assess a Signatory’s business practices and compliance measures under AFSL obligations to determine that AFSL obligations can be relied upon. Below are proposed considerations in developing this guidance for feedback as part of this consultation paper.

| Current Code Guidance | Proposed Code Guidance |
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| <p>[not currently in the Code Guidance]</p> | <p>The Administrator will assess a Signatory’s business practices and compliance measures under AFSL obligations by:</p> <ul style="list-style-type: none"> • Obtaining certain types of information regarding a Signatory’s AFSL including: Capabilities under the license; AFSL identification details; if any Corporate Authorised Representatives are under the license. • Obtaining information on a Signatory’s general business activities and financial services activities under the Code. • Identifying if the information required is published or if information sharing arrangements are required. • Completing an initial detailed assessment and then routine assessment thereafter if a Signatory’s AFSL and general business activities have not changed. • Reduce information required from Signatories overtime regarding financial services activities under the Code where they have demonstrated that their AFSL obligations provide sufficient coverage. |

3.2 Reducing Regulatory Burden for ERF Project Proponents

Recommendations 19 and 20 suggests that the Code Administrator can recognise that sub-section 2.3 (3) and (4) of the Code as not applicable to Signatories where they are ERF proponents for projects under the CFI Act. The Administrator accepts that if Signatories provide evidence that these overlapping obligations have already been met under a Signatories obligation under the CFI Act, then these sections of the Code do not apply.

The following amendments to Code text are proposed to implement these recommendations.



| Current Code Text | Proposed Code Text |
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| <p>2.3.3 Offsets reporting and audits</p> <p>(a) Signatories must inform the client of the offset reporting requirements under the CFI Act, ERF Method or other scheme.</p> <p>(b) Signatories must provide the client with a summary of the kind of information and records that will be required for reporting and audit purposes.</p> <p>(c) Where relevant, Signatories will advise the client that the project will be subject to mandatory audit.</p> <p>(d) Signatories will explain the audit purpose and process to the client. The client will be made aware that:</p> <p>(i) A site visit may be required; and</p> <p>(ii) The client may be required to sign a statutory declaration regarding certain aspects of the project activities and records.</p> | <p>2.3.3 Offsets reporting and audits</p> <p>(a) Signatories must inform the client of the offset reporting requirements under the CFI Act, ERF Method or other scheme.</p> <p>(b) Signatories must provide the client with a summary of the kind of information and records that will be required for reporting and audit purposes.</p> <p>(c) Where relevant, Signatories will advise the client that the project will be subject to mandatory audit.</p> <p>(d) Signatories will explain the audit purpose and process to the client. The client will be made aware that:</p> <p>(i) A site visit may be required; and</p> <p>(ii) The client may be required to sign a statutory declaration regarding certain aspects of the project activities and records.</p> <p>(e) The requirements set out in (a) through (d) above do not apply where a Signatory is an ERF proponent for a project, as project proponents are already required to comply with offsets reporting and audits under the CFI Act. Signatories are still required under section 2.2(5) to provide general advice to clients on administrative and compliance requirements for offset reporting and audits under the CFI Act.</p> |
| <p>2.3.4 Record keeping</p> <p>(a) Signatories must have written policies and processes for record keeping which support compliance with the record keeping requirements under the CFI Act, ERF Method or other scheme.</p> <p>(b) Records must be kept in a manner that are easily accessible for audit or other purposes including, but not limited to:</p> <p>(i) correspondence between the scheme participant and the Regulator in relation to the project;</p> <p>(ii) information about:</p> <p>(A) the scheme participant’s legal right to carry out the project, and</p> <p>(B) (if applicable) ownership of the applicable carbon sequestration right;</p> <p>(iii) information to support decisions made by the scheme participant in relation to obligations under the CFI Act;</p> | <p>2.3.4 Record keeping</p> <p>(a) Signatories must have written policies and processes for record keeping which support compliance with the record keeping requirements under the relevant scheme.</p> <p>(b) Records must be kept in a manner that are easily accessible for audit or other purposes including, but not limited to:</p> <p>(i) correspondence between the scheme participant and the Regulator or operator of relevant scheme in relation to the project;</p> <p>(ii) information about:</p> <p>(A) the scheme participant’s legal right to carry out the project, and</p> <p>(B) (if applicable) ownership of the applicable carbon sequestration right;</p> |



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| <p>(iv) information about any variations to the project;</p> <p>(v) information about regulatory approvals obtained in relation to the project;</p> <p>(vi) information about how applicable NRM plans have been considered;</p> <p>(vii) offsets reports and audit reports;</p> <p>(viii) information used to prepare an offsets report;</p> <p>(ix) information about any uncertainties associated with data used to determine abatement, including information and procedures used to derive uncertainty estimates;</p> <p>(x) information about any assumptions made in abatement calculations and the procedures used to derive the assumptions;</p> <p>(xi) information about any event that is reasonably likely to significantly increase or decrease abatement;</p> <p>(xii) information about all procedures used to collect, document, monitor and process data used in determining abatement for the project; and</p> <p>(xiii) any other information required under the applicable ERF Method, Rules or CFI Act.</p> | <p>(iii) information to support decisions made by the scheme participant in relation to obligations under the CFI Act or other relevant scheme;</p> <p>(iv) information about any variations to the project;</p> <p>(v) information about regulatory approvals obtained in relation to the project;</p> <p>(vi) information about how applicable NRM plans have been considered;</p> <p>(vii) offsets reports and audit reports;</p> <p>(viii) information used to prepare an offsets report;</p> <p>(ix) information about any uncertainties associated with data used to determine abatement, including information and procedures used to derive uncertainty estimates;</p> <p>(x) information about any assumptions made in abatement calculations and the procedures used to derive the assumptions;</p> <p>(xi) information about any event that is reasonably likely to significantly increase or decrease abatement;</p> <p>(xii) information about all procedures used to collect, document, monitor and process data used in determining abatement for the project; and</p> <p>(xiii) any other information required under the applicable scheme.</p> <p>(c) The requirements set out in (a) and (b) above do not apply where a Signatory is an ERF proponent for a project, as project proponents are already required to comply with record keeping under the CFI Act. Signatories are still required under section 2.2(5) to provide general advice to clients on administrative and compliance requirements for record keeping under the CFI Act.</p> |
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3.3 Strengthening the Code through Information Sharing

Recommendation 21 suggests that the Code Administrator refer to the published registers on the Clean Energy Regulator’s website where possible and to request that the Clean Energy Regulator make project data available to minimise administrative burden on Signatories and the Administrator.

The view of the Administrator is that to reduce regulatory burden for Signatories, without compromising the integrity of the Code, the Administrator needs to strengthen both the information available to it on regulatory regimes and its capacity to understand that information. While the recommendation refers only to accessing Clean Energy Regulator information, the Administrator considers that its information needs should be broadened to include other existing and emerging standards and regimes including ASIC, voluntary carbon schemes (e.g. Gold Standard, VERRA), and relevant overlapping carbon co-benefit frameworks.



The Administrator is also aware that a growing number of formal policy frameworks/mechanisms that (i) embed the Code as either an eligibility requirement to access funding, or (ii) endorse the Code as a best-practice standard for market participation (E.g., Qld Government Department of Environment, Land and Water - Land Restoration Fund (LRF)). The view of the Administrator is that there is also a need to set up information sharing arrangements with these frameworks/mechanisms to ensure that key details of Code Signatories are made available for this purpose.

The Administrator proposes the following amendments to Code text to identify the requirement for certain information to be provided on Signatories compliance activities under regulatory regimes and the objective of accessing this information through information sharing arrangements where possible to reduce administrative burden.

| Current Code Text | Proposed Code Text |
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| <p>2.5. (6) Information to be provided</p> <p>(g) Signatories must provide the Code Administrator with the following information and data upon request:</p> <p>(i) relevant procedures outlined above in section 2.5(4): In-house procedures and complaints handling;</p> <p>(ii) records of all relevant business activities and transactions relating to a suspected breach, including (if applicable) information provided to the Complainant, and training provided to employees. These records must be kept for a minimum period of five years for audit purposes in the administration of this Code;</p> <p>(iii) details of any known breaches of the Code; and</p> <p>(iv) any other information that the Code Administrator deems relevant for investigating a suspected breach of the Code. This information will be used by the Code Administrator in managing the administration of and compliance with the Code, including compliance audits and investigating all suspected breaches of the Code.</p> <p>(h) All commercial-in-confidence information will be treated with appropriate confidentiality.</p> | <p>2.5. (6) Information to be provided</p> <p>(g) Signatories must provide the Code Administrator with the following information and data upon request:</p> <p>(i) relevant procedures outlined above in section 2.5(4): In-house procedures and complaints handling;</p> <p>(ii) records of all relevant business activities and transactions relating to a suspected breach, including (if applicable) information provided to the Complainant, and training provided to employees. These records must be kept for a minimum period of five years for audit purposes in the administration of this Code;</p> <p>(iii) details of any known breaches of the Code; and</p> <p>(iv) any other information that the Code Administrator deems relevant for investigating a suspected breach of the Code. This information will be used by the Code Administrator in managing the administration of and compliance with the Code, including compliance audits and investigating all suspected breaches of the Code.</p> <p>(v) information relating to a Signatories compliance with regulatory or other carbon and/or overlapping co-benefit schemes including identification details of relevant projects and related entities (corporate structure) for projects where Signatories have a contractual obligation.</p> <p>(h) All commercial-in-confidence information will be treated with appropriate confidentiality.</p> <p>(i) The Code Administrator will obtain access, where possible, to public and certain non-public information on Signatories compliance activities under regulatory or other carbon/and/or overlapping co-benefit schemes to reduce administrative burden for Signatories and the Administrator.</p> |



4. Items for feedback on possible information sharing approaches

The financial and operational sustainability of the Code will continue to rely, in part, on the Administrator achieving its responsibilities to monitor Code compliance in an efficient and targeted way. Access to a Signatory’s compliance activities and details in overlapping regulatory regimes and other schemes will assist the Administrator to target compliance monitoring efforts where they are most needed ensuring maximum impact from the resources available to the Code.

In Table 1 below are proposed considerations in developing and managing information sharing arrangements with regulatory regimes and schemes for feedback as part of this consultation paper.

Table 1: Considerations for Information Sharing Arrangements

- Signatories, CER, ASIC, LRF and other voluntary carbon and other relevant overlapping carbon co-benefit schemes will be consulted on these information sharing arrangements prior to their implementation.
- As new frameworks develop that relate both directly and indirectly to the carbon industry (e.g. carbon co-benefit schemes), what are the key considerations/tests that should apply to determine the appropriate relationship that the Code should have with these frameworks? Noting that the relationship could include the formal endorsement of a scheme, recognition of compliance activities under the scheme, and information sharing arrangements.
- The Administrator is committed to ensuring that the Administrator complies with sub-section 2.5(6)(h) of the Code to treat all commercial-in-confidence information provided with appropriate confidentiality.
- Assessments on access to both public information vs non-public information will be completed to inform any possible information sharing arrangements.
- Priority will be to reduce administrative burden for Signatories and the Administrator through these arrangements.
- Considerations of the current legislative frameworks that exist to allow information sharing will be explored including obtaining Signatory consent-based approaches.
- Transparency on the information sharing arrangements would include identifying the purpose of sharing information; the types of information to be shared; the organisations involved; and how the shared information will be used by the receiving organisation.
- Acknowledgement of approved schemes and information sharing relationships will be publicly available on the Code of Conduct website and updated from time to time as required. How the information sharing arrangements contribute to reducing regulatory and administrative burden will also be identified.

The Administrator recommends that information sharing arrangements be explored with the entities identified in Table 2 as a priority and is requesting feedback on the type of information that could be shared as part of this consultation.


Table 2: Details of Potential Information Sharing Arrangements

| Organisation/Agency | Type of Information | Direction of Information Provision |
|---|--|---|
| Australian Securities and Investment Commission (ASIC); | AFSL obligations; AFSL standing; and AFSL non-compliance. Pending AFSL applications. AFSL status, license number, license capabilities. | From ASIC to Code Administrator. |
| Clean Energy Regulator (CER); | Responsibilities of project proponent. Fit and Proper person test status. Project proponent/organisation details; Project Agent details; If an organization/project is an Indigenous identified organization/project. ERF project details: Project IDs related to Signatories; For conditionally registered projects – the types of outstanding consents; ERF contracts that are connected to Signatories. Contract IDs where Signatory is a contract holder. ANREU data – Where Signatories are cancelling/surrendering ACCUs on behalf of other entities. Selling into private market. Compliance related information including performance under enforceable undertakings. Pending investigations. | From CER to Code Administrator. |
| Qld Government Department of Environment, Land and Water – Land Restoration Fund (LRF). | Signatory organisation contact details; Signatory primary contact details; Signatory business activity details; Signatory administration details. Relevant Signatory Compliance information. Project IDs related to Signatories that have contractual obligations under the LRF. Details on the measurements of co-benefits associated with these projects. | Between Code Administrator and LRF. |
| Gold Standard & VERRA. | Project IDs related to Signatories that have contractual obligations under these schemes. Details on the measurements of co-benefits associated with these projects. | From Gold Standard & VERRA to Code Administrator. |



Consultation Next Steps

The Administrator will:

1. Undertake consultations in April 2021 with the following groups of stakeholders, as relevant:
 - Signatories
 - The Clean Energy Regulator
 - The Australian Securities and Investments Commission
 - Government Partners of the Code
 - Industry Supporters of the Code
 - Prospective Signatories, Partners, and Supporters
2. Use the information provided during the consultations to inform the Code's development as it is transitioned to fully operational from 1 July 2021.
3. Continue to inform stakeholders and Signatories of prospective amendments to the Code, and provide an electronic copy of the Code text with proposed changes clearly marked prior to the updates being enacted.
4. Invite stakeholders' final comments on the draft updates, which will be taken into account at the Administrator's discretion.

Stakeholders from any of the above groups are invited to contact the Code Administrator (code.administrator@carbonmarketinstitute.org) to confirm interest in participating in the consultations.

for more information please contact

Code Administrator

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