

signatory annual report  
**self-audit checklist**

June 2021



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 and Transition Year (until the end of FY21), 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 submit the annual report by 1 August following the end of each financial year.**

Signatories have the option of either:

- a) completing the annual report by filling in the self-audit checklist below, which can be submitted to the Code Administrator by email; or
- b) completing the [online form](#).



## 1. Annual Report Online Form

### Signatory details

<b>Signatory ID</b>	
<b>Compliance year</b>	2020/21

### Project details

<b>During the 2020/21 compliance year, have you been contractually involved with any Carbon Offset Projects<sup>1</sup> or ERF Projects<sup>2</sup> that had commenced (as defined by the rules of the scheme) on or after 1<sup>st</sup> July 2018?</b>	Yes / No
<b>If yes, what is the total number of ERF projects?</b>	
<b>If yes, what is the total number of other (non-ERF) Carbon Offset Projects?</b>	
<b>If yes, what is the total intended volume of abatement<sup>3</sup> in tonnes of carbon dioxide equivalent (tCO<sub>2</sub>-e) stored or avoided by the project(s) you have been contractually involved with over the past 12 months (if known)</b>	
<b>If yes, list the associated method(s) or project type(s)</b>	
<b>If yes, list the project location(s) (state and postcode) associated with your project(s)</b>	

### 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.

<sup>1</sup> As defined by Appendix 1 Section 1(10) of the Code.

<sup>2</sup> As defined by Appendix 1 Section 1(30) of the Code.

<sup>3</sup> Over the lifetime of the project



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

**For any other responses, you may provide additional comments to demonstrate compliance as well.**

Item	Description	Y	N	N/A	Comments
<b>A</b>	<b>Pre-project activities<sup>4</sup></b>				
<i>Communication with clients</i>					
<b>A.1</b>	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>					
<b>A.2</b>	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>					
<b>A.3</b>	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.				
<b>A.4</b>	The legal right has been transferred to the entity who will be the scheme participant (if required and where appropriate).				
<b>A.5</b>	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.				
<b>A.6</b>	If the project occurs on native title land, the Signatory has undertaken appropriate due diligence to ensure that Native Title Holders and Native Title Holders with a claim were consulted and provided with guidance about the project prior to project registration				

<sup>4</sup> This section also applies to projects that are yet to be registered



Item	Description	Y	N	N/A	Comments
<b>A.7</b>	Signatory has ensured that consent from all eligible interest holders associated with the project has been/is to be obtained in a timely manner in accordance with the requirements of the CFI Act.				
<i>ERF Information: Method requirements and project administration</i>					
<b>A.8</b>	Signatory has provided relevant information to the client on the ERF Methods applicable to the project.				
<b>A.9</b>	Signatory has provided information to the client regarding the administrative and compliance requirements associated with undertaking an ERF project.				
<b>A.10</b>	Signatory has provided information to the client concerning the ability to vary and end projects, including the associated implications (if relevant).				
<b>A.11</b>	Signatory has provided advice to the client on relinquishment triggers and revocation triggers, and the associated implications (if relevant).				
<b>A.12</b>	Signatory has provided the client with specific information in relation to undertaking a sequestration project under the ERF.				
<b>A.13</b>	Social, environmental and economic co-benefits have been considered by the Signatory in the planning and implementation of the project.				
<b>A.14</b>	Signatory has provided ongoing advice to ensure that the client understands the compliance requirements associated with the relevant ERF Method.				
<b>A.15</b>	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>					
<b>A.16</b>	All feasibility advice provided by the Signatory complies with the Australian Financial Services Licensee (AFSL) requirements under the Corporations Act.				
<b>A.17</b>	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.				



Item	Description	Y	N	N/A	Comments
	- 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.				
<b>A.18</b>	The Signatory has provided information to clients for ERF projects regarding crediting periods.				
<b>A.19</b>	The Signatory has 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).				
<b>A.20</b>	Signatory has informed the client of the relevant options available for the sale of carbon credits.				
<b>A.21</b>	Signatory has informed the client of whether the Signatory holds an AFSL, and the implications of this in relation to the level of financial advice that can be provided.				
<b>A.22</b>	The Signatory has disclosed to the client any interest or benefit the Signatory has in a carbon credit sales option.				
<b>A.23</b>	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.				
<b>A.24</b>	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>B</b>	<b><i>Project management</i></b>				
<b>B.1</b>	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>B.2</b>	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>B.3</b>	Signatory has provided the client with a summary of the type of information and records that will be required for reporting and audit purposes.				



Item	Description	Y	N	N/A	Comments
<b>B.4</b>	Signatory has advised the client, where relevant, that the project will be subject to mandatory audit and has explained the processes involved.				
<b>B.5</b>	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>B.6</b>	Signatory has maintained appropriate records in a manner that is easily accessible for audit or other reporting and information purposes.				
<b>B.7</b>	Signatory has a written policy for identifying and consulting with relevant stakeholders.				
<b>B.8</b>	Signatory has communicated relevant and accurate information about the project to all stakeholders, including client, government agencies and other relevant parties.				
<b>B.9</b>	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.				
<b>C</b>	<b>General Requirements</b>				
<b>C.1</b>	There is a written agreement between the Signatory and the client that is expressed in a clear and transparent way, using plain English language.				
<b>C.2</b>	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.				
<b>C.3</b>	Signatory has an appropriate internal complaints handling process that is fair, efficient and transparent.				
<b>D</b>	<b>Compliance</b>				
<b>D.1</b>	Signatory has ensured that the project being undertaken complies with all local, state and federal legislation.				
<b>D.2</b>	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.

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

**For any other responses, you may provide additional comments to demonstrate compliance as well.**

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

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

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

↳	Attachment Title	Attachment Description
A		
B		
C		

+Add additional rows as required.



## Declaration and Reaffirmation Checklist

<b>Signatory Declaration</b>	
As a Signatory to the Carbon Industry Code of Conduct, [I/we] attest to having met the requirements of the Code over the 2020/21 compliance year for all projects, as defined by the Code. [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"> <li>• Been undertaken in a transparent and accountable manner;</li> <li>• Ensured environmental and social integrity of the scheme;</li> <li>• Complied with applicable legislation and regulations; and</li> <li>• Facilitated community trust in the outcomes of the scheme.</li> </ul>	
[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 [my/our] ongoing commitment to the Code of Conduct.	
<b>Name</b> (print full name)	
<b>Title</b> (role)	
<b>Organisation</b>	
<b>Signature</b> (attach electronic signature)	
<b>Date</b> (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](mailto: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.

**for more information please contact**

The Code Administrator

[code.administrator@carbonmarketinstitute.org](mailto:code.administrator@carbonmarketinstitute.org)



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