

1) Section 4 is missing the consideration of intergenerational equity.

Given the lack of scientific certainty of the severity of long-term environmental impacts from GHG emissions this guideline should outline how the precautionary principle and intergenerational equity approach is applied to decision making for GHG emissions and their management by a large emitter. This should include the assessment of practicable option for GHG avoidance, reduction, mitigation, and offset.

2) Suggest clarifying the boundary and definition of 'proposed action' under this guideline to ensure consistency and transparency in inclusions and exclusion of GHG emission sources. It is important to note that the scope 1 relates to the proposed action rather than the entity. i.e. a major project may employ many subcontractors however it is the emissions from the major project including its subcontractors which needs to be considered under this guidance. NT EPA should clarify where the boundary of a proposed action stops, for example are emissions from the mining of and logistics of transport of bulk materials mined offsite for a major project included.

3) The major pathway to net zero is through electrification and energy efficiency improvement. If scope 2 is excluded from thresholds the NT EPA will miss the opportunity to review the associated environmental impact of electricity use, energy efficiency opportunities, best practice design and ensure practicable energy efficiency opportunities are included in major industrial projects. As written the NT EPA will only get to assess the environmental impacts and controls on the supply side of the electricity generation not the demand side of its use.

4) 5th Para 2nd sentence. Typo. 'thatLand'

5) Given the inherent uncertainty in GHG estimation during early project development we support this statement:

The NT EPA also considered applying a threshold range to minimise a proposed action being planned to ensure its emissions are just shy of the threshold in order to avoid referral.

6) Scope 3 emissions: Please include the background and reasoning to requesting scope 3 emissions estimates. Please clarify how scope 3 emissions will be managed under the NT EP Act and this guidance. Consider clarifying further the boundary of the GHG estimate for scope 3 emissions eg the boundary of embodied GHG emissions in materials of supply and clarify how far we calculate down the end use, eg the downstream impacts on land use change from a major dam development.

7) The following does not appear to align with the NT Long Term Emissions Target and GHG Policy

A breakdown of emissions by source, including but not limited to: stationary energy; fugitives; transport; and emissions associated with changes to land use (scope 1 emissions from land use change are not included in threshold calculations for industrial actions, however they are to be provided as part of an action's emissions profile).

It is noted that some industrial proposed actions require large areas of land use change e.g. solar/renewable facilities these land use emissions should be considered under this guideline.

8) This guideline should specifically define how avoided emission from renewable power supply and renewable hydrogen/ammonia projects are to be calculated and presented to the NT EPA. This should consider avoided emissions in the NT and other jurisdiction.

9) The FullCAM model has numerous methods and settings. Suggest clarifying which methods are to be used for NT EP referral estimates for consistency and transparency.

10) The NT EPA should request benchmarking for comparable actions and projects from the Australian Government's Department of Industry, Science, Energy and Resources who collect this information on a national scale. This information is not made publicly available from the Australian Government and proponents of proposed actions would likely rely upon literature which may not accurately benchmark the proposed actions. This information is made publicly available in other international jurisdictions, alternatively the NT EPA should lobby the Australian Government to release NGERs reporting and GHG intensity metrics publicly.

11) This guideline should specifically identify how it applies to large scale renewable/solar projects.

12) The GHG abatement plan does not address scope 3. International best practice does consider scope 3 emissions in the development of GHG abatement plans.

13) The guideline does not define where scope 2 emissions are 'applicable' yet it defines requirements for applicable scope 2 emissions. We suggest including scope 2 emissions within the thresholds.