

RESPONSE TO “GUIDANCE STATEMENT: ANNUAL AUDIT COMPLIANCE REPORTS”

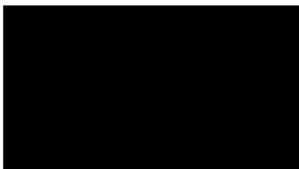
Suez Australia wishes to submit a response to the DER’s Guidance Statement, as above. Our response is in two parts.

Firstly, we would question what the value would be in making these AACRs publicly available. In many cases, where there has been a requirement to report a non-compliance, the AACR will need to include some technical detail, to aid clarity. Persons with a genuine interest in understanding the non-compliance may, under the current system, request release of any AACR under FoI. It is likely that such persons will already have some level of competence to understand the released AACR with a fair degree of balance. However, by making the AACR available to all and sundry with no prior checks and balances risks involving the DER, and the originator of the AACR, in extra work due to uninformed enquiries from persons who lack understanding of the technical and environmental issues involved.

Secondly, AACRs may need to include commercially sensitive information, especially where they contain non-compliance reports. Whilst it is noted that there is a proposed provision in the new system whereby redactions can be proposed in advance (subject to the DER’s approval), this would seem to be a untidy way of proceeding. Suez recommends that the existing system be maintained whereby AACRs are sent in confidence to the DER and (possibly redacted) reports only released to third parties on production of a suitably authorized FoI request.

Whilst Suez will always ensure that its AACRs contain full and frank information, whatever the reporting system may be, we would be concerned that some other AACR generators, knowing that whatever they might put in the report be immediately publicly available, might be less forthcoming with what they state in their report, to the detriment of transparency overall.

Yours sincerely



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