

Consultation 1: Climate Change Licensee Requirements

Question: The EPA is seeking feedback on the proposed time frames for the Annual Climate Change Emissions Report and Climate Change Mitigation and Adaptation Plans. Are these time frames suitable considering NGERS and Safeguard Mechanism reporting obligations? Are there other factors the EPA should be aware of?

Feedback on Timelines

- **Proposed timeline for the Annual Climate Change Emissions Report:** As AirTrunk already reports some of the required metrics to the Clean Energy Regulator under NGER Scheme, we will have these datapoints by 31 October every year, so a reporting deadline of 28 February the following year is reasonable and manageable.
- **Proposed timeline for the Climate Change Mitigation Action Plan (CCMAP):** According to the consultation, the CCMAP is to be published for the most recently concluded financial year by 31 October. This would mean that, for FY26-27, which concludes on 30 June 2027, the CCMAP will need to be published by 31 October 2027, with a lead time of 4 months.

This would pose resource constraint issues since AirTrunk will be undergoing our annual sustainability audit and data collection during the July to October period. A deadline of 31 October for the CCMAP will overlap significantly with these existing regulatory deadlines, e.g. AASB S2, which need to be lodged with our financial accounts within 4 months of financial year end.

Even though AASB S2 overlaps with some CCMAP requirements, as pointed out by EPA there are many new requirements which AASB S2 currently does not cover, so AirTrunk will require more time to prepare the necessary addendum to address elements not currently covered in our existing reporting.

We suggest a 28 February reporting timeline, similar to the Annual Climate Change Emissions Report.

Technical Feedback on Annual Climate Change Emissions Report

- **Reporting Requirements for Annual Climate Change Emissions Report:**

- **Emissions Intensity Definition:** Sector-specific metrics should be developed – ‘emissions intensity in tonnes carbon dioxide equivalent per tonne of raw material produced’ does not apply to the data centre industry. For data centres, a relevant emissions intensity metric can be emissions per data centre IT load.
- **Energy Intensity Definition:** Similarly, ‘units of energy consumed per unit of raw commodity produced’ does not apply to the data centre industry. A universally used energy intensity metric for the data centre industry is Power Usage Effectiveness (PUE).

Consultation 2: Climate Change Mitigation and Adaptation Plans: Proposed Mitigation Requirement

Question: Can you suggest other existing plans like CCMAPs that the EPA could reference?

AirTrunk currently discloses premise-specific emissions data to NGER. AirTrunk also reports our electricity forecast to AEMO, to be included in their ISP and system level forecast. These two submissions support the government’s Scope 2 reporting. Referencing NGERs and AEMO would support transparency and ease the reporting burden on businesses.

Question: The EPA has heard from some licence holders that publishing 10-year emission estimates may reveal commercially sensitive information. Do you have any suggestions for how to meet the intent of this requirement without publishing commercially sensitive information?

CCMAP – commercially sensitive information

AirTrunk faces significant challenges in disclosing premise-specific emissions data in general, not just with respect to the 10-year emissions forecast.

As a colocation data centre operator, AirTrunk leases data centre capacity to customers. Our customers manage their IT equipment onsite and consume electricity on our premises. AirTrunk has confidentiality agreements with our customers to protect their energy consumption data. If we are to publicly disclose premise-specific consumption data, the public, and by extension, our customers, will be able to derive commercially sensitive information about other data centre capacity offtakers within each of AirTrunk’s sites. This would likely constitute a breach of AirTrunk’s confidentiality agreements with our customers.

To help protect customer confidentiality, AirTrunk proposes the following suggestions, which can still meet the intent of forward-looking decarbonisation pathways:

- Each entity can publish aggregated emissions data across all premises, or
- Each entity can disclose a range/band for current and future emissions, instead of exact amounts.

Annual Climate Change Emissions Report – commercially sensitive information

In addition, AirTrunk would like to clarify with the EPA on what EPA intends to do with the annual data that we report under the Annual Climate Change Emissions Report.

AirTrunk currently discloses premise-specific emissions data to NGER, but only aggregated, group-level data is published on the Clean Energy Regulator website. For similar data that AirTrunk will report to EPA, AirTrunk would like to understand if any of this data will be made publicly available. In particular, information such as premise locations, premise-specific emissions and premise-specific energy consumption is commercially sensitive.

Question: Is there any additional information that would help licensees create their CCMAPs?

Scope 2 market-based emissions

- Currently, entities are only required to report location-based scope 2 emissions to NGER. This negates the impact of renewable energy procurement, which is the primary lever for scope 2 reduction for hyperscalers and data centre operators. For EPA data collection, we request that EPA collect both location-based and market-based scope 2 emissions. By including both metrics, the role data centre operators play in accelerating the growth of in-market renewable energy production would be recognised.

Industry Support

- **Standardised Reporting Format:** Consider implementing a simple, industry-specific form that captures only the essential data points required for compliance. Companies can attach supporting documentation as evidence.
- **Briefing Sessions:** Conduct concise briefing sessions to provide an overview of the Climate Change Mitigation and Adaptation Plans (CCMAPs), including the objectives, required actions, and timelines. These sessions would be valuable not only for target companies but also for third-party consultancies supporting them.
- **Consultancy Support:** Provide a list of recommended third-party consultancies that are qualified to assist companies in meeting CCMAP requirements. This would help ensure consistency, quality, and efficiency in implementation and reporting.