



**EnergyAustralia**

EnergyAustralia Pty Ltd  
ABN 99 086 014 968

Level 33  
385 Bourke Street  
Melbourne Victoria 3000

Phone +61 3 8628 1000  
Facsimile +61 3 8628 1050

enq@energyaustralia.com.au  
energyaustralia.com.au

13 February 2015

John Lee  
Analyst  
Financial System and Services Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600

[ERF@treasury.gov.au](mailto:ERF@treasury.gov.au)

**RE: EnergyAustralia submission to the Corporations Amendment (Emission Reduction Fund Participants) Regulation 2015**

EnergyAustralia welcomes the opportunity to provide comment on the Corporations Amendment (Emission Reduction Fund Participants) Regulation 2015.

We have no objections to the proposed exemptions to the Corporations Act 2001 and Corporations Regulations 2001 for participants in the Emissions Reduction Fund's processes. Our only potential concern relates to the implications of the proposed exemptions for the Commonwealth Anti-Money Laundering and Counter-Terrorism Financing Legislation, which cross references the definition of 'Derivative' in Chapter 7 of the Corporations Act 2001. A consequence of the proposed exemption would appear to be that anti-money laundering and counter-terrorism financing compliance requirements would not apply to ERF proponents. We seek to draw Treasury's attention to this potential consequence.

Please don't hesitate to contact me on (03) 8628 1183 if you have any questions in relation to this submission.

Regards

*signed for*

**Steven Wright**

Carbon Policy Manager

Corporate Affairs