
NDIS Quality and Safeguards Commission

Emissions Reduction Plan 2023-24

Acknowledgement of Country

The NDIS Quality and Safeguards Commission (NDIS Commission) acknowledges the Traditional Owners and custodians of the of the lands on which we work, and we pay our respects to their Elders past, present and emerging.

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Accountable Authority Sign Off

The Australian Government released the Net Zero in Government Operations Strategy in November 2023, setting out the overall approach and action required by Commonwealth entities to achieve the APS Net Zero 2030 target.

The Net Zero in Government Operations Strategy represents a strong commitment by the Australian Government to lead by example on emissions reduction and contribute to the decarbonisation of Australia's economy.

The NDIS Commission is committed to the achievement of the Government's APS Net Zero 2030 target. The NDIS Commission is following the APS Net Zero 2030 target in full, as per the Net Zero in Government Operations Strategy.

This Emissions Reduction Plan describes the priorities and actions the NDIS Commission is taking to reduce our operational emissions and contribute to the APS Net Zero 2030 target.



Michael Phelan APM

A/g NDIS Commissioner

19 August 2024

Emissions Reduction Plan

Purpose

The NDIS Commission is responsible for managing and implementing emissions reduction initiatives set by the Australian Government's [Net Zero in Government Operations Strategy](#) (the Strategy) developed by Department of Finance. The Strategy sets out the Australian Government's approach to achieving net zero greenhouse gas emissions from its operations by 2030 and the reinstatement of public emissions reporting.

The goal of this Emissions Reduction Plan is to provide a pathway for the NDIS Commission to contribute to the achievement of the APS Net Zero 2030 target through emissions reduction activities. This plan encompasses existing and new priorities and actions within NDIS Commission to reduce emissions.

This Emissions Reduction Plan has been completed in accordance with the Strategy, associated guidance and reporting standards for annual emissions reporting.

Net zero greenhouse gas emissions

APS Net Zero 2030 is the target set by the Australian Government to achieve net zero greenhouse gas emissions from government operations by the year 2030. It includes scope 1 and scope 2 emissions from activities in Australia and its territories, as described in the Strategy. The APS Net Zero 2030 target applies at the aggregate level to non-corporate Commonwealth entities and generally covers the entirety of the entity's organisation. From an organisational perspective, this means minimising the greenhouse gas emissions that are within our control.

Governance and reporting

Progress against actions identified within this Emissions Reduction Plan, and any additional measures adopted, will be included in our annual reports. This, combined with annual emissions reporting, will be used as a measure of NDIS Commission progress towards reducing its emissions.

As part of the Net Zero in Government Operations Annual Progress Report, the Department of Finance will aggregate these measures to provide whole-of-Australian Government emissions reporting.

NDIS Commission Operational context

The NDIS Commission is an independent body that works with people with disability, providers, state and territory government agencies and the community to delivery nationally consistent, responsive and effective regulation of NDIS providers.

The NDIS Commission as an independent regulator for the NDIS operates nationally with offices in all eight Australian states and territories, supporting over 610,000 NDIS participants with more than 900 staff.

The NDIS Commission conducts regular outreach activities to stakeholders and clients in all parts of the nation, from metropolitan capitals and rural/semi-rural regions to extremely remote central Australian communities.

The NDIS Commission has already commenced its Net Zero emissions pathway in line with the direction set in the Strategy. This includes the following key activities:

- procurement of 100 per cent GreenPower for all electricity supply meters (outside landlord billed meters) for New South Wales and the Australian Capital Territory with the procurement of GreenPower for the new Melbourne site to commence in May 2024;
- an electric vehicle (EV) charging feasibility study has been conducted at all locations;
- investigation into EV charging facilities at all occupied sites and for use of available public chargers nearby;
- procurement of EVs and roll out of EV chargers at sites maintaining fleet vehicles; and
- incorporation of green lease schedule and active participations in building management committees at the current Green Lease property.

Baseline emissions

Baseline emissions are a record of greenhouse gases that have been produced in the past and were produced prior to the introduction of any strategies to reduce emissions. The baseline emissions from financial year 2022-23 are the reference point against which emissions reduction actions can be measured.

The baseline emissions for this plan focus on scope 1 and scope 2 emissions, consistent with the APS Net Zero 2030 target. Electricity-related emissions were calculated using the location-based method. The complete 2022-23 greenhouse gas emissions inventory tables for NDIS Commission are presented in our 2022-23 annual report.

NOTE: As the NDIS Commission fleet vehicle operations only commenced in November 2023 there are no full year baseline emissions details available for any historical period. Emissions estimates below are based on *current fleet* manufacturer CO2 Pollution (g/km) extrapolated to anticipated fleet vehicle mileage.

Baseline year	Financial year 2022-23
Scope 1 emissions	13.4 tCO ₂ e
Scope 2 emissions	173.858 t CO ₂ e
Total emissions	187.258 tCO ₂ e

Engagement

In the development of this plan NDIS Commission has been working with

- Department of Finance;
- Climate Action in Government Operations – to ensure that this plan aligns with the Net Zero in Government Operations Strategy and the Commonwealth Climate Disclosure requirements;

- Department of Social Services (DSS) Fleet team – to discuss options associated with low emissions vehicles;
- DSS Travel Team – to discuss options and considerations for lowering travel emissions;
- Portfolio – where possible shared considerations could be addressed to lower emissions across the social services portfolio; and
- Neighbouring tenants – to discuss options for shared locations and any associated and relevant outcomes to lower emissions.

Emissions reduction targets

The NDIS Commission is following the APS Net Zero 2030 target in full, as per the Net Zero in Government Operations Strategy. The target covers the entirety of our entity's operations within Australia and its territories for scope 1 and scope 2 emissions, as described in the Strategy.

The NDIS Commission is in a significant growth period, being a new agency and adapting to findings from various external reviews, and is anticipated as a result to have a staff footprint almost 30 per cent greater than present by 2025-26.

While the strategies being adapted by the NDIS Commission across property and fleet portfolios will result in a notable decrease in carbon footprint for a specific vehicle or building, the considerable increase in average staffing level and infrastructure to support this means we are unable to provide an accurate figure on long term emissions at this point.

In order to achieve significantly reduced emissions targets for infrastructure in support of the Net Zero policy by 2030, we have adopted the following carbon reduction strategies:

Electricity procurement

We project that carbon emissions will decrease over the next year to 1 July 2025 by 9 tCO_{2e} following the first year of procurement of GreenPower for the Melbourne site as part of the current retailer contract with Shell. This is a reduction of 6 per cent (location-based).

The procurement of GreenPower and large-scale generation certificates (LGCs) will then be followed as part of the new whole-of-Australian-Government electricity contract led by the Department of Finance.

The remaining emissions are attributed to the following sources:

- electricity use from embedded network sites with landlord invoicing (64 tCO_{2e} 37 per cent of scope 2 emissions for location-based emissions);
- fleet vehicles (accounting for 7.16 per cent of the NDIS Commission's total emissions using the location-based methodology for electricity); and
- waste and refrigerant and other scope 3 emissions (out of scope for this document).

Procurement of GreenPower/LGCs for embedded network sites

For embedded network sites, we will initiate conversations with our respective landlords (starting with the metropolitan airport sites) and request for GreenPower options be made available at market rates. We project a 50 per cent reduction for this emission source targeted by July 2026.

Electrification

The NDIS Commission is not responsible for any gas consuming assets at occupied properties.

Regarding fleet vehicles, we will continue to explore low emissions vehicles in line with the APS Net Zero targets. Refer to the Fleet section for more details.

Offset of residual emissions

Annual updates on the progress of implementing the emissions reduction initiatives listed above will be provided as part of these annual reports, when each target will be reassessed.

All residual emissions closer to the target year of 2030 will be addressed through the purchase of carbon offsets (i.e. Australian Carbon Credit Units, ACCUs).

This Emissions Reduction Plan has been completed in accordance with the Net Zero in Government Operations Strategy, associated guidance, reporting standards for annual emissions reporting.

Priorities and actions

For NDIS Commission to contribute to the achievement of the APS Net Zero 2030 target, targeted action on existing emissions reduction measures and the introduction of further or new measures is required. These actions are summarised in the following points, with further detail provided below:

- procuring renewable electricity;
- improving building standards;
- transitioning the fleet vehicles to low emission vehicles; and
- sustainable procurement.

Additional actions include:

- LED lighting upgrades;
- solar PV installations;
- electrification;
- energy efficient controls;
- waste and recycling; and
- water efficiency.

Buildings

NABERS Ratings and Energy Efficiency

ACTION: The NDIS Commission is committed to occupying energy efficient office spaces. Currently, only one tenancy includes a green lease schedule (GLS), which requires an annual NABERS Energy tenancy rating with a target of 4.5-stars.

The GLS tenancy exceeds the current 4.5 stars target, with the tenancy (Penrith, 121 Henry Street) performing at 6.0 stars (Note: the rating expired in December 2023 and is in the process of being renewed).

The NDIS Commission will seek to incorporate green leases and NABERS Energy targets of 5.5 stars in future office leases, including for office space of 1,000m² or more from 1 July 2025, in accordance with the Net Zero in Government Operations Strategy requirements.

Outside the current GLS sites, the following premises larger than 1,000m² currently occupied by NDIS Commission have an indicative (non-certified) NABERS Energy Tenancy or Whole Building rating of 5 stars or less, hence will require further investigation for improvement:

- QLD Brisbane 215 Adelaide (non-current GLS site, 1,015m², indicative tenancy rating of 5.0 stars).

Outside the NABERS ratings listed above for the tenancies, the below list shows the publicly available certified NABERS ratings maintained by the respective landlords for the different base buildings of sites larger than 1,000m²:

- NSW 121 Henry St Penrith (premises area of 2,239m², GLS site, base building rating of 5.0 stars); and
- NSW Parramatta 3 Parramatta Square (premises area of 1,205m², no lease requirements, base building rating of 5.5 stars).

Lighting upgrades for energy efficiency improvement:

ACTION: NDIS Commission will investigate the feasibility of upgrading existing tenancy lighting to LED particularly at sites not meeting the updated 5.5 stars NABERS rating target. The emissions and cost savings resulting from these lighting upgrades have not yet been quantified but will be investigated further.

Electrification

The NDIS Commission will preference fully electrified buildings as part of its property strategy including for landlord's services which generally use gas as part of HVAC heating.

ACTION: The NDIS Commission to require electrification of landlord services of future tenancies (or current tenancies for lease renewals) with landlord as part of future lease negotiations.

Electricity

Renewable electricity

ACTION: As outlined above, the NDIS Commission will consult with the Department of Finance (DoF) to ensure participation in the WoAG wide electricity procurement led by DoF and replace all electricity contracts with renewable electricity in the form of GreenPower Procurement for small market meters and Large Generation Certificates (LGCs) for large market meters.

Procuring 100 per cent GreenPower/LGCs would eliminate all emissions associated with electricity purchased from the grid for eligible sites outside tenancies with embedded network arrangements where the landlords hold the utility electricity accounts with the energy retailers.

Solar PV installation / upgrade

The NDIS Commission will investigate the feasibility of installing rooftop solar PV systems at various properties. The emissions and cost savings resulting from these PV systems have not yet been quantified but will be investigated further.

ACTION: Rooftop solar benefitting the NDIS Commission will continue to be a focus in future lease negotiations offered by landlords as part of future lease incentives.

Fleet

NDIS Commission has commenced with replacement of existing hybrid vehicle fleet with battery electric vehicles (BEVs) in metropolitan sites, which account for all bar 1 of the current vehicle fleet, with this vehicle being light commercial for extremely remote travel requirements.

The electrification of the fleet is staged with an initial BEV located at the Penrith tenancy from mid-2024 with associated infrastructure planned to be installed soon after, and then rolled out to the remainder of sites to replace existing vehicles at end of lease.

The NDIS Commission fleet is still in early growing stages so there is a likelihood it may need to expand to suit Agency requirements, and in the future include additional vehicles which may include plug in hybrids or additional remote travel vehicle(s) which are not accounted for in these figures.

ACTION:

Actions noted will be undertaken by the NDIS Commission's Security and Workplace Services team:

- The NDIS Commission will have an Electric Vehicle Charging Plan in place by July 2024.
- An initial BEV has been accepted at 121 Henry St Penrith late June 2024. This vehicle will be used to fine-tune Commission communication strategy, documentation, and policy guidance.
- Negotiations with landlords have commenced via property service provider JLL as a component of the electric vehicle feasibility study. Relevant charging infrastructure to be initially installed at Penrith and soon after at the remainder of NDIS Commission tenancies maintaining fleet vehicles.
- Simultaneously as point 2 is in progress, replacement low emission vehicles (LEVs) (predominantly BEVs) will be on order to replace five hybrid vehicle leases expiring at the end of the 2024-2025 financial year, and one being returned without replacement.
- The remainder of metropolitan fleet of hybrids (six vehicles) will be replaced by LEV as leases expire into the 2025 and 2026 calendar years.
- Based on current technology and light commercial vehicles being required in remote locations, existing fleet emissions are anticipated to reduce by up to 50 per cent by the end of the 2026 calendar year (assuming no additional fleet growth in this time).
- As noted in *Emissions Reduction Targets*, while NDIS Commission strategies to build on LEV and improvements in technology will result in a carbon emissions reduction per fleet unit, the long-term emissions levels cannot be predicted with any accuracy given likely need for fleet growth to support business requirements.

Involved participants

The following areas of NDIS Commission have been involved in the development of this plan:

Division/Branch	Title	Name
Security and Workplace Services	Fleet Manager	Brett Hegarty
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