



**Submission on the Climate Change  
(Unique Emissions Factors)  
Regulations (Draft for Consultation)**

**BP Oil New Zealand Limited  
July 2009**

**SUBMISSION ON THE SETTLEMENT SYSTEMS, FUTURES AND EMISSIONS UNIT  
BILL 252-1 (2008)**

1. BP Oil New Zealand Limited (BP) welcomes the opportunity to make a submission on the Climate Change (Unique Emissions Factors) Regulations 2009.
2. We do not request a meeting in support of our submission.

**Part 3, section 21(2) - Recognition of Verifiers**

3. BP notes that under this section of the bill, in order to be recognised as a verifier the applicant must be either a chartered accountant or a chartered professional engineer. We believe that this is too restrictive given the nature of the diversity of emission factors.
4. Verification of unique emission factors requires the appropriate skills in the particular discipline associated with the product. By restricting those that can verify the emission factor to chartered accountants and chartered professional engineers you are substantially reducing the number of potential verifiers and in many cases requiring the verifier to pass judgement on a product they have no knowledge of.
5. Consideration should be given to expanding the potential group of verifiers to include all qualified engineers (such a chemical engineer's) with proven expertise in the particular field of science being submitted.
6. Chartered membership does not appear to add any benefit to the process; rather it may prove to be restrictive as there are a number of engineers who choose not to be part of an engineering affiliation.
7. In relation to including chartered accountants as verifiers, it would appear that this is at odds with the technical nature of verifying an emissions factor. The process is most likely going to require expertise in a scientific discipline, as opposed to expertise in numeric verification.
8. BP would like to thank the Committee for taking time to consider this submission. Please do not hesitate to contact us if the Committee has any queries regarding this submission or if BP can be of further assistance to the Committee.

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