To Director
Climate Disclosure Unit
Climate & Energy Division
Treasury
Langton Cres
Parkes ACT 2600

Thank you for the opportunity to submit our feedback for the Climate-related financial disclosure: exposure draft legislation.

AIgorithm has been working on climate change related physical risk and emissions monitoring for years and improving on modelling and measurements. We do this by working with NASA, CSRIO, European Space Agency, Geoscape and many other organisations to bring about a digital representation of all land parcels and buildings in Australia. We then work through all this historic conditions such as soil moisture, historic bushfires, vegetation growth rates, forestry types and biomass, soil composition, water observations at 30 meter granularity and hundreds of other data points. We then use artificial intelligence modelling to forecast out future risk across a range of natural perils for the climate change scenarios

For greenhouse gas emissions there are satellites measuring the actual emissions daily across Australia. We have other 250 million recordings of the measurements of net carbon exchange across Australia. This is sufficient for actual measurements rather then estimates in areas like agriculture, mining, and some other industries.

Some areas of scope 3 emissions for businesses with side a array of suppliers and customers such as supermarkets and banks would defiantly be challenging. For example the emissions of a small business to a bank such as a cafe.

Climate related risks and emissions are very important and we agree in the requirements and timeframe and requirement for smaller organisations to have a phased timeline. Organisations such as AIgorithm are helping to reduce the cost of the organisations accessing there risks, by using a scientific approach and standardising the data. The main feedback is transparency should be required for organisations submitting the risks models and emissions calculations.

Aigorithm is happy to have further discussions with Treasury.

Kind Regards,

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