DECISION USEFUL DIAGNOSIS 017 — FY2025

Hunter Water Corporation (NSW State Owned Corporation)

Not decision-useful for four of five audiences, because Scope 3 is not quantified in any period, and the annual report omits that emissions rose 1.8% in the year

REPORTING PERIOD
FY2025

REVIEW DATE
7 August 2026 (first reviewed 27 July 2026; revised 3 August 2026, 4 August 2026)

PROTOCOL
Climate Disclosure Review Rules v15.23

SECTOR
Electricity, Gas, Water and Waste Services

6 / 15 overall score · sum of the five audience ratings, for ranking

11 of 19 load-bearing criteria not met. The score saturates, because a row reaches 1 on two failures and cannot go lower, so the criterion count is reported beside it. The two answer different questions: the score is how many audiences can use the disclosure, the count is how many things are wrong.

This review tests Hunter Water's publicly available climate disclosure against CRI's Climate Disclosure Review Rules, which use the CRI Net Zero Standard as the reference for a credible claim together with AASB S2 Climate-related Disclosures. It reflects the information available at the review date, states what the evidence supports, what it does not, and what would resolve each open point, and says "cannot verify", not "no issue", where evidence is missing. It is general information, not legal, financial or investment advice, and not an audit or an assurance engagement. It does not allege illegality, misconduct,

greenwashing or dishonesty. Organisations may contact CRI at robc@noco2.com.au to identify an error, provide relevant public information or request review of updated disclosures. See Important information at the end of this report.

Decision-usefulness at a glance

Company	Carbon / supply-chain accounting	Institutional investors	Consumer / retail investors	Consumers & public	Regulators
Hunter Water Corporation (NSW State Owned Corporation)	1	1	1	1	2

How to read this report

HOW TO READ THE RATINGS

Each audience gets its own rating.

The same disclosure can be reliable for one reader and misleading for another, so we rate decision-usefulness **separately for each audience** on the three-point scale below. There is no single pass/fail verdict — decision-usefulness is a judgement about each audience, not the report as a whole.

1 **Not decision-useful**
Cannot be relied on in its current form for this reader's decision.

2 **Mostly decision useful**
Usable, with one material limitation the reader must work around.

3 **Decision-useful**
Can be relied on. A deliberately high bar.

The bar below adds the five audience ratings into an **overall score out of 15**. It is used only to rank reports against one another — it carries **no band and no verdict label**. Its colour simply reflects the mix of the five ratings: the more red, the more audiences the disclosure falls short for.



6 / 15
overall score · for ranking only

This review assesses whether the company's climate disclosure is *decision-useful*: whether a reader can actually rely on it for the decision they are making. Because a disclosure that is sound for one reader can mislead another, we score decision-usefulness **separately for each of the main audiences** that rely on climate disclosure. The audiences, and what each needs from the disclosure, are the same across all our reviews:

AUDIENCE	WHAT THEY RELY ON THE DISCLOSURE FOR
Carbon / supply-chain emissions accounting	Lifting the company's emissions figures into their own inventory. They need complete category coverage (nothing material excluded), a single reconcilable footprint, and a disclosed, transparent method. Whether a figure is estimated or supplier-specific is a maturity question, not a fault: the fault is exclusion.
Institutional investors	Pricing climate risk (physical and transition) including target credibility and whether targets are being met with real reductions, the completeness of financed / portfolio exposure, and flow-through exposure inherited from investees or counterparties whose own emissions may be growing. They can usually reconstruct detail, so they are judged on whether the true position is derivable.
Consumer / retail investors	Understanding the company's climate position and target progress without expert reconstruction. They need the headline claims to match the evidence, the material sources to be targeted, and caveats to be easy to find.
Consumers & public	Knowing whether the company's public claims are true: that it is genuinely acting rather than greenwashing, and not fuelling climate change while presenting otherwise. Headline claims matter most to this audience, which is least able to read past a buried caveat.
Regulators	Whether the disclosure is compliant, consistent across sources and audiences (does the company say one thing to one audience and something else to another), and useful across the board.

The **overall score** is simply the sum of the five audience ratings (5-15), used only to rank reports; it has no band and no verdict of its own. §2.1 gives each audience's rating and the reason behind it; §1 covers scope and basis, §2.2–2.3 the evidence dashboard, §3 what the disclosure means for a reader (what's counted, financed-emissions detail, real-vs-accounting movement, trajectory), §4 the findings, §5 disclosure-risk, §6 how to fix it and §7 the conclusion; the working annexes show the rule-level derivation.

Two conventions apply throughout. A certification (including the Australian Government's Climate Active program) is treated as a claim to be tested, not as a strength in itself. Detailed disclosure and candour about a company's own gaps are the baseline expected of a credible discloser, not a credit.

---

1. Scope & basis

1.1 What we reviewed

DOCUMENT	REVIEWED?	IF MISSING, EFFECT ON THIS REVIEW
Climate-related Financial Disclosures 2025 (inaugural, 2024-25)	Yes	The primary climate document and the subject of this review
Annual Report 2024-25 (audited financial statements, corporate scorecard, sustainability scorecard)	Yes	Primary audited evidence base; the emissions figures also appear here
Annual Reports 2019-20, 2020-21, 2021-22, 2022-23, 2023-24	Yes	Prior-period context for the trajectory (§3.4); not current disclosure
NGER register (FY2024-25, as at 27 February 2026)	Yes	Statutory cross-check; Hunter Water does not appear as a controlling corporation
Basis of Preparation document (referenced at CRFD p5)	Not provided	Method, factors, boundary treatment and the basis for the base-year change **cannot be independently verified**
Net Zero Roadmap (referenced throughout; summarised at CRFD Appendix A)	Not provided	Only the Appendix A summary chart and its assumptions were available; lever-level costings and sensitivities **cannot be verified**
Climate Change Adaptation Plan	Not provided	Adaptation actions, milestones and costings **cannot be verified**
Quantified Scope 3 inventory or category table	Not published: not produced	Scope 3 magnitude and category coverage **cannot be verified**; no bounding estimate exists for any category
Assurance statement over the GHG figures	Not published: none exists	The report states the figures "have not been independently verified by a third party", so every emissions figure is management-prepared
Veolia emissions report (the source of the treatment-plant emissions)	Not provided	Roughly two-thirds of Scope 1 and just under half of Scope 2 rest on a contractor's report that was not provided and is not independently verified
Certificate / LGC register, or ACCU issuance and retirement records	Not provided	The renewable-electricity and carbon-credit legs of the target **cannot be reconciled**
Electricity consumption (MWh) and the grid emission factors applied	Not published: not disclosed	The reported reduction **cannot be separated** into own action and grid decarbonisation

The audited Annual Report is the anchor for figures that appear in both documents; the climate report is the primary climate document and the subject of the review. Where the two disagree, the difference is recorded rather than smoothed over.

1.2 Standards the company is held to or references

STANDARD / FRAMEWORK	REFERENCED BY COMPANY?	HOW STRONGLY	SECTOR MODULE(S) APPLIED
Corporations Act / Ch 2M	No	Not applicable: a NSW statutory State Owned Corporation, not a Chapter 2M reporting entity; financial statements audited by the Audit Office of New South Wales	Applicability gate
AASB S2	Partly: indirectly, through the NSW framework: TPG24-33 is "primarily informed by" AASB S2 and, in the company's own words, "not yet fully aligned"	Mentioned: indirect and expressly qualified; no AASB S2 compliance or alignment claim is made	Not applicable
ASIC RG 280	No: not referenced	Not applicable: not an ASIC-supervised disclosing entity for this report	Not applicable
GHG Protocol (Corporate / Scope 2 / Scope 3)	No: not referenced	Not referenced: no GHG Protocol claim made; operational-control language is used but sourced to the NGER Act	GHG inventory
PCAF (financed emissions)	Not applicable: not a financial institution	Not applicable	Not applicable
SBTi	Yes: by negation; targets "informed by ... science-based target-setting methodologies" and "aligned with the emissions reduction goals of the Paris Agreement", but "not been formally validated by an external body (e.g. Science Based Targets Initiative)"	With reference to: "aligned with" is a strong claim and is tested substantially; validation is expressly disclaimed	Targets
Climate Active / other carbon-neutral framework	No: no certification claimed or held	Not applicable: the 2019-20 "carbon neutral by 2030" goal was an internal aspiration, not a certification	Not applicable
Certificates (GreenPower / LGC / ACCU / REC)	Yes: ACCUs (Australian Carbon Credit Unit Scheme, tree-planting method) and LGCs via the AGL power purchase agreement; onsite solar	With reference to: both instruments carry material weight in the 2030 and 2035 targets	Scope 2 / offsets
NSW Treasury TPG24-33 (First Year Climate Related Disclosures)	Yes: "prepared in accordance with"	Binding: the mandatory framework and the strongest framework claim made; tested strongly	Applicability gate
NGER Act 2007 and NGER (Measurement) Determination 2008 (2024 update)	Yes: "calculated in accordance with"	In accordance with: strong calculation-method claim, tested strongly within the calculation described	GHG inventory
Hunter Water Act 1991, State Owned Corporations Act 1989, IPART Operating Licence, NSW Net Zero Future Act 2023, NSW Climate Change Adaptation Strategy, Climate Risk Ready NSW Guide, NARCLiM 1.5 and 2.0, WSAA Simple Wastewater Treatment Calculator, National Electricity Law	Yes	Binding: statutory obligations, plus "informed by" and "in alignment with" references (looser)	General sector; no specialised module triggered

1.3 Review basis & limitations

Standard evidence-led review of Hunter Water's inaugural climate-related financial disclosures and the audited annual report they accompany, read against a six-period annual-report series. No specialised sector module applies. Several limitations bound the conclusions. **No assurance exists over any emissions figure**, which the report states expressly, and roughly two-thirds of Scope 1 and just under half of Scope 2 come from a contractor's own emissions report that was not provided. The Basis of Preparation document, the Net Zero Roadmap itself, the Adaptation Plan, the certificate register and the ACCU issuance records were not provided, so the method, the roadmap's lever costings, the renewable-electricity leg and the carbon-credit leg of the target are cannot-verify. **Electricity consumption and the**

grid emission factors applied are not disclosed in any period, so the reported reduction cannot be split between the company's own action and the decarbonisation of the New South Wales grid. Scope 3 is not quantified for any category in any period. **Market-based Scope 2, the basis on which the targets are actually set and will be tracked, has not been reported for any period.** The Appendix A roadmap is an image chart; its lever values were transcribed and reconciled against the narrative percentages, and carry an extraction-fidelity caveat. This is a **mandatory** reporting year under a NSW Treasury framework rather than a voluntary one, so the compliance findings run against TPG24-33 and no AASB S2, Chapter 2M or ASIC findings are available.

2. Verdict

2.1 Decision-usefulness by audience

1

Carbon / supply-chain emissions accounting

0 met · 1 partial · 3 not met

The footprint cannot be lifted, and unusually the reason is as much the baseline as the boundary. The current-year inventory is cleanly disaggregated, by scope, by source and by operator, and Table 3 reconciles exactly. Three things defeat it. **(a) Scope 3 is not quantified for any category in any period**, with no bounding estimate, and for a utility mid-construction on a desalination plant, capital goods, purchased goods and grid transmission losses are obviously material. **(b) There is no single reconcilable footprint.** Three baseline values (82,097, 81,026 and 79,000 t CO_2-e) sit across the reporting suite against three stated base periods (2005, 2020-21 and 2021-22) on two different methods, and no inventory was ever published for 2021-22, the period the climate report's own target table names as its base. **Market-based Scope 2, the basis the targets are set and tracked on, is not reported for any period. (c) Nothing is assured**, and roughly half the footprint comes from a contractor's report that was not provided and cannot be traced.

`§3.1, §3.4, Annex B`

1

Institutional investors

1 met · 2 partial · 3 not met

The reduction is largely not the company's own, and the position cannot be rebuilt. On Hunter Water's own roadmap, **grid decarbonisation supplies about 55% of the planned 2030 reduction**, own action about 23%, renewable electricity contracts about 18% and carbon credits about 4%, yet the current-year narrative attributes the reduction to onsite solar alone, having named grid decarbonisation the year before. Total emissions **rose 1.8% this year** and the rise is stated nowhere; Scope 1 is **up 31% since the baseline** and now a quarter of the footprint, with the fastest-growing component being Hunter Water's own liquid-fuel and gas combustion, against which the roadmap offers one uncosted, undated line. The 2035 endpoint is neither funded nor decided: it depends on a future price-path decision and a customer willingness-to-pay test, gross emissions are projected to rise between 2030 and 2035, and 26% of it is tree-planting credits. And the

reconstruction that would test any of this is unavailable: no consumption or factor data in any period, no market-based Scope 2, three baselines, and an onsite-generation series that does not reconcile across three successive annual reports.

§3.1, §3.3, §3.4, §4, §5

1

Consumer / retail investors

0 met · 2 partial · 2 not met

The annual report and the climate report tell different stories, and neither published status can be tested. The annual report reports "a 13% reduction" and "we are on track to meet our 2030 commitment"; it does not say that emissions **rose 1.8%** this year, that Scope 1 rose 31% since the baseline, or that most of the plan is grid decarbonisation. The red status on one page is measured against **an annual target the reporting suite never quantifies**, so it cannot be tested; the green status 22 pages later grades the 80%-by-2030 target on a location-based figure while the same page's own footnote says that target is set on the market-based method, which is precisely why the climate report records the same assessment as not available. Targets cover Scope 1 and 2 only, the entire value chain is untargeted, and the 2030 target is a *net* target of which 4% is tree-planting credits, a character the annual report never states. Finding the real position means opening a separate document and reading its appendix.

§3.3, §3.4, §4.2

1

Consumers & public

0 met · 1 partial · 2 not met

The target language in the climate report is careful, and it is not the language this audience meets. In the audited annual report the 2030 commitment is stated three times as a plain **"80% reduction"** and never as a *net* target, and the words "ACCU", "carbon credit" and "carbon offset" appear nowhere in that document, while the climate report says 4% of the 2030 target and 26% of the 2035 target are tree-planting credits and the projected *gross* reduction is 76%. The promise of "100% renewable energy by 2030" for large sites includes, on the company's own stated assumption, the mandatory renewable share every electricity customer already receives, with the voluntary increment never separated. And the composite impression does not hold: the reduction is attributed to onsite solar in a year total emissions rose and Scope 2 moved seventeen tonnes, a figure that is itself a 729-tonne fall on Hunter Water's own sites against a 712-tonne **rise** on the contractor-operated half. Against that, the action is real: a boundary election that roughly doubles the reported footprint, 6.4 MW of behind-the-meter solar built, and a 2030 pathway funded through an independent price determination.

`§4, §5`

2

Regulators

0 met · 1 partial · 1 not met

This is a mandatory first year, not a voluntary one, and the report substantially delivers the required structure: all four pillars, a full requirements index, a boundary that goes further than the law compels, audited financial statements, and a 2030 pathway funded inside the price determination. The one material limitation is consistency, and it is wide. The annual report's **G** against the 80%-by-2030 target and the climate report's **"N/A"** against the same target cannot both be right; a red status is published against a target quantified nowhere; the base year is stated as 2005, 2020-21 and 2021-22 with three values on two methods and no restatement note; the same 2030 target is a *net* target in the mandated climate report and an unqualified reduction target in the audited annual report; the ACCU registration status is stated two contradictory ways in one document; the onsite-generation series does not reconcile across three annual reports; and the rationale for excluding the treatment plants from statutory reporting changed between periods, the earlier account being wrong on its face. Two framework gaps also sit open: a net target without an associated gross target, and no permanence basis for the credits.

`§2.3, §5.3, Annex J`

What the company should fix first: publish the annual emissions target the red status is measured against, reconcile the annual report's "on track" and **G** with the climate report's "N/A" for the 80%-by-2030 target on one stated method, and disclose the electricity consumption and grid emission factors that would let a reader separate the company's own abatement from grid decarbonisation.

2.2 Scorecard

Headline claim ↔ evidence match	●●○○○
Inventory completeness (Scope 1/2/3)	●●○○○
Target credibility	●○○○○
Offset / certificate / renewable integrity	●○○○○
Standards / compliance confidence	*Appears broadly compliant, minor limitations, with two potential compliance concerns*
Reader accessibility	●●○○○
Disclosure quality	**6 / 15**
Financed-emissions completeness (if FI)	*N/A*
Real reduction vs accounting movement	●○○○○
Assurance coverage vs claim	●○○○○
Comparability (like-for-like only)	●●○○○
Evidence limitations	*Material*

DIMENSION	RATING	JUSTIFICATION
Headline claim ↔ evidence match	2/5	The target's *wording* is accurate and correctly bounded in the climate report: net, Scope 1 and 2 only, conditional. The *performance* claim is not: "13% reduction" and "on track" are stated in a year emissions rose 1.8%, and the increase appears nowhere. The red status is measured against a target the suite never quantifies, and the green 22 pages later grades the 80%-by-2030 target on a method that target is not set on.
Disclosure quality	6 / 15 overall	Detailed on governance, risk process, boundary explanation and roadmap composition; weak on the quantitative spine, with no consumption data, no factors, no market-based Scope 2, no Scope 3 and no assurance.
Inventory completeness (Scope 1/2/3)	2/5	Scope 1 and 2 complete and disaggregated well beyond the statutory boundary, by source and by operator; Scope 3 absent entirely, with no bounding estimate for any category.
Financed-emissions completeness (if FI)	N/A	Not a financial institution.
Target credibility	1/5	2030 is funded in the current price determination; 2035 is not, depending on future investment decisions and a willingness-to-pay test. Gross emissions rise between 2030 and 2035, 26% of the 2035 endpoint is tree-planting credits, no gross target exists, no permanence basis is disclosed, the base year has moved twice, and the target is measured on a method not yet reported.
Real reduction vs accounting movement	1/5	On the company's own roadmap about **55% of the 2030 reduction is grid decarbonisation**. The current-year narrative attributes the reduction to onsite solar alone, having named grid decarbonisation the year before. The split cannot be verified, because consumption and factors are not disclosed in any period.
Offset / certificate / renewable integrity	1/5	ACCU registration status is stated two contradictory ways in one document; 45,000 credits stated generated against 15,000 "currently available" is unreconciled; no permanence basis is given for plantings in a region the same report identifies as bushfire-exposed; and the "100% renewable" target expressly includes the mandatory renewable share.
Assurance coverage vs claim	1/5	No assurance over any emissions figure, stated expressly in a footnote. Three favourable external reviews of the *report* are described prominently on page 5; none is assurance over the *figures*.
Standards / compliance confidence	Appears broadly compliant, minor limitations, with two potential compliance concerns	Mandatory TPG24-33 first year; four pillars and the requirements index delivered, and the framework prioritises qualitative disclosure in year one. Open: a net target without an associated gross target, and no permanence disclosure for the credits relied on.

DIMENSION	RATING	JUSTIFICATION
Comparability (like-for-like only)	2/5	Assessed stand-alone, not ranked. Comparability is weak in its own right: a boundary deliberately wider than the statutory test, location-based figures against a market-based target, and three baselines make like-for-like comparison difficult without adjustment.
Reader accessibility	2/5	The climate report is well-structured and readable. But the true position is only reachable by combining the annual report, the separate climate report and its appendix, and the two documents state the same target differently.
Evidence limitations	Material	No assurance, no Basis of Preparation, no Roadmap, no Adaptation Plan, no consumption or factor data, no market-based Scope 2, no Scope 3, no certificate or ACCU records, and no contractor emissions report.

2.3 Standards & compliance snapshot

AREA	RATING	BASIS
Corporations Act / Ch 2M	Not applicable for the period	A NSW statutory State Owned Corporation under the Hunter Water Act 1991 and the State Owned Corporations Act 1989; not a Chapter 2M reporting entity. Financial statements audited by the Audit Office of New South Wales.
AASB S2	Not applicable for the period	AASB S2 does not bind the entity. The NSW framework is "primarily informed by" AASB S2 and, per the company, "not yet fully aligned"; no AASB S2 compliance or alignment claim is made, so no AASB S2 finding is recorded.
ASIC RG 280	Not applicable for the period	Not an ASIC-supervised disclosing entity for this report; claim-quality is nonetheless assessed on its own terms.
GHG Protocol / Scope 2 / Scope 3	Cannot verify: material evidence missing (market-based Scope 2 and Scope 3)	No GHG Protocol claim is made. Location-based Scope 2 is disclosed; market-based, the basis the targets are set and tracked on, has not been reported and begins in 2025-26. Scope 3 is not quantified for any category.
PCAF / financed emissions	Not applicable for the period	Not a financial institution.
Carbon-neutral / net-zero framework	Potential compliance concern	"Net zero Scope 1 and 2 by 2035" is a self-declared, correctly bounded net target and no certification is claimed. The concern is not the wording but the substance: an unfunded endpoint conditional on a willingness-to-pay test, gross emissions rising between 2030 and 2035, 26% delivered by credits, and an unstable base year.
Certificates / credits	Cannot verify: material evidence missing	No certificate register, no disclosure of certificate creation, retention or retirement, and no ACCU issuance or retirement records. Registration status is stated two contradictory ways; 45,000 generated against 15,000 available is unreconciled; and the "100% renewable" target expressly includes the mandatory renewable power percentage.
NSW Treasury TPG24-33	Appears broadly compliant: minor limitations, plus two potential compliance concerns	Mandatory Phase 1 first year, delivered against all four pillars with a full requirements index; the framework prioritises qualitative disclosure in year one. Open: a net target is disclosed while the entity states it has no formal gross target, offering projections instead; and no permanence assumptions are disclosed for the carbon credits the target relies on, though the framework names permanence expressly. Also open: the annual report grades the 80%-by-2030 target **G** on a basis the climate report says cannot yet be assessed, and the current-year trend, a 1.8% rise, is not analysed in either document.
Other company-referenced framework (NGER Act; Paris alignment)	Appears broadly compliant: on method; potential claim-quality concern on Paris alignment	NGER Method 1 and the water-industry wastewater calculator are named source by source, so method transparency is a strength. Separately, targets described as "aligned with the emissions reduction goals of the Paris Agreement" cover Scope 1 and 2 only, exclude the value chain, rely on credits for a quarter of the endpoint, and are expressly unvalidated.

3. What this means for a reader

3.1 What is counted / not counted

Reporting basis: 2024-25, **location-based** Scope 2, on a boundary Hunter Water has deliberately drawn **wider than the statutory operational-control test**. It includes the water and wastewater treatment plants operated by its contractor Veolia, which the statutory test excludes and Veolia reports. Absolute gross Scope 1 and 2 is **70,532 t CO_2-e** (Scope 1 18,516 plus location-based Scope 2 52,016), against a

2020-21 baseline of 81,026 t CO_2-e. Every component in the disclosed table sums correctly. **Market-based Scope 2, the basis on which the targets are set and will be tracked, is not reported for any period.** No figure is assured. Scope 3 is not quantified for any category.

Emissions composition

Values as reported (tCO_2e). Bars are independent magnitudes, not a stack.

Source: Climate-related Financial Disclosures 2025 Table 3 (Scope 1 and location-based Scope 2); Scope 3 not quantified in any period



What is counted

Every scope and Scope 3 category, coloured by inclusion status. Values as reported.

Source: Climate-related Financial Disclosures 2025 Table 3 and Table 5; Figure 2 (Scope 3 Emissions Roadmap)



SCOPE / CATEGORY	STATUS	QUANTIFIED (tCO_2E)	MATERIAL?	NOTE
Scope 1: combustion, fugitive and fleet	Reported	18,516	Yes	Hunter Water-operated 6,492 plus contractor-operated 12,024. Wastewater methane and nitrous oxide (dominant), liquid fuel in fleet and plant, natural gas in a boiler, and sulphur hexafluoride from switchgear. The narrative source list names only three of these four: the natural-gas boiler appears only in the methodology table, so the narrative list is incomplete on the document's own terms. Sulphur hexafluoride recorded nil this year. **Up 31% on the baseline**, with no source-and-driver decomposition of the realised rise anywhere; a generic forward driver, "population growth leading to additional operational activity", is disclosed for the *projected* growth bar only.
Scope 2: electricity (location-based)	Reported	52,016	Yes	Hunter Water-operated 28,655 plus contractor-operated 23,361. Treatment plants, pumping stations and offices. Down 22% on the baseline; essentially flat year on year (52,033 → 52,016), and that flat figure is two offsetting movements, a 729-tonne fall on Hunter Water-operated sites against a 712-tonne rise on the contractor-operated half.

SCOPE / CATEGORY	STATUS	QUANTIFIED (tCO_2e)	MATERIAL?	NOTE
Scope 2: electricity (market-based)	Not disclosed: not reported for any period	Not disclosed	Yes: this is the target's own basis	The targets were set on, and will be tracked on, the market-based method; reporting begins in 2025-26. The AGL power purchase agreement ran for half of this reporting period with no market-based figure to show its effect.
Scope 3 C1 Purchased goods & services	Excluded	Not disclosed	Yes: likely material	Treatment chemicals, the contractor operations and maintenance contract, pipes and materials. Named in a "Scope 3 Emissions Roadmap" box with no figure and no bounding estimate.
Scope 3 C2 Capital goods	Excluded	Not disclosed	Yes: likely material	The company is mid-construction on the Belmont Desalination Plant and is delivering agreed treatment-plant upgrades and mains renewals. Embodied carbon in that programme is not measured.
Scope 3 C3 Fuel- & energy-related	Excluded	Not disclosed	Yes: likely material	Transmission and distribution losses on the electricity behind 52,016 t CO_2-e of Scope 2, plus upstream fuel.
Scope 3 C4 Upstream transport & distribution	Excluded	Not disclosed	Cannot verify: possible	Chemical and materials delivery; not disclosed.
Scope 3 C5 Waste	Excluded	Not disclosed	Yes: likely material	Biosolids handling, transport and end use. The report identifies biosolids as an emissions-reduction *opportunity* while not counting the emissions.
Scope 3 C6 Business travel	Excluded	Not disclosed	No: minor	Not disclosed.
Scope 3 C7 Employee commuting	Excluded	Not disclosed	No: minor	Not disclosed.
Scope 3 C8 Upstream leased assets	Excluded	Not disclosed	Cannot verify: possible	Not disclosed. The treatment plants are contractor-operated but are counted in Scope 1 and 2, not here.
Scope 3 C9 Downstream transport & distribution	Not relevant	Not applicable	No	Water is delivered through the entity's own network, inside Scope 1 and 2.
Scope 3 C10 Processing of sold products	Not relevant	Not applicable	No	No sold product is further processed.
Scope 3 C11 Use of sold products	Excluded	Not disclosed	Cannot verify: possible, worth testing	Customer-side energy used to heat and pump supplied water is a recognised category for water utilities; not addressed or ruled out.
Scope 3 C12 End-of-life of sold products	Not relevant	Not applicable	No	—
Scope 3 C13 Downstream leased assets	Not relevant	Not applicable	No	Not disclosed; no material leasing-out activity identified.
Scope 3 C14 Franchises	Not relevant	Not applicable	No	A regulated monopoly; no franchises.
Scope 3 C15 Investments / financed & facilitated	Not relevant	Not applicable	No	Not a financial institution; no material investment portfolio identified.

3.2 Financed-emissions detail (financial institutions)

N/A: not a financial institution.

3.3 Real reduction vs accounting movement

Hunter Water's planned 2030 reduction: share of each lever (own roadmap)

Decomposition of the reported reduction into its drivers.

Source: Climate-related Financial Disclosures 2025 Appendix A, Figure 1A (Net Zero Roadmap, market-based)



Grid decarbonisation (business-as-usual) (55 pp)
Onsite solar and energy efficiency (own action) (23 pp)
Renewable electricity contracts (18 pp)
Tree-planting carbon credits (4 pp)

Of the 100 percentage-point reduction reported, about 23 pp is own action beyond business-as-usual; the rest is external / accounting movement.

REPORTED CHANGE	DRIVER	REAL-WORLD REDUCTION?
Total Scope 1 and 2 down 13% on the 2020-21 baseline (81,026 → 70,532), attributed in the climate report to "increased onsite solar generation, consumed directly on site"	**Mixed**: **not separable from the disclosure**. Electricity consumption and the grid emission factors applied are not disclosed for any period, so own action cannot be distinguished from the decline in the New South Wales grid's emissions intensity. The prior-year annual report named grid decarbonisation as a driver; this year's climate report does not.	**Partly**: the beyond-business-as-usual share is **cannot verify**
Scope 2 down 22% on the baseline (66,891 → 52,016)	**Mixed**: onsite solar consumed behind the meter (real) plus grid emission-factor decline (external, and it would have happened anyway). The company's own roadmap, describing the 2020-21 to 2029-30 window on a market-based basis, says the reduction "primarily results from grid decarbonisation, the roll out of Hunter Water Phase 1 and 2 Onsite Renewable Energy Program, the AGL renewable PPA for large sites and the Belmont Desalination Plant and energy efficiency and process optimisation initiatives": **grid decarbonisation is named first and as primary, while the body narrative names only the second item**.	**Partly**: the split is not disclosed
Scope 2 essentially flat year on year (52,033 → 52,016, a 17-tonne fall) **in the year onsite solar capacity roughly doubled** (2.96 MW to 6.4 MW, Balickera Solar Farm switched on late 2024)	**Cannot** verify: not explained. A doubling of behind-the-meter generation delivering a 0.03% Scope 2 movement implies rising consumption, a flat grid factor, or both, none of which is disclosed. **The flat figure is two offsetting movements rather than stability:** Hunter Water-operated Scope 2 fell 729 t (29,384 → 28,655, a 2.5% fall) while contractor-operated Scope 2 **rose 712 t** (22,649 → 23,361, a **3.1% rise**). The onsite solar sits on Hunter Water-operated sites, so the only part of Scope 2 the claimed driver can reach fell 2.5%, and the other half of the footprint went up by more than the whole net movement.	**No**: no measurable reduction this year, **and half the Scope 2 footprint rose**

REPORTED CHANGE	DRIVER	REAL-WORLD REDUCTION?
Scope 1 **up 31%** on the baseline (14,135 → 18,516) and up 7.2% year on year; Hunter Water-operated sites alone up 17.3% in one year and **35.6% on the baseline**	**Cannot** verify: a generic forward driver is disclosed, "population growth leading to additional operational activity", but no source-and-driver decomposition of the realised rise appears in any document. Sulphur hexafluoride was nil. On the disclosure's own source mapping, the wastewater methane and nitrous oxide are sourced to the contractor's report and all treatment plants are contractor-operated, so the Hunter Water-operated Scope 1 column is liquid fuel in fleet, plant and machinery plus the natural-gas boiler: **the fastest-growing part of the footprint is Hunter Water's own direct fossil-fuel combustion, not process emissions**. The roadmap names methane capture, biogas and waste-to-energy and fleet electrification as opportunities, but states that "Not all of the identified opportunities have been costed or included in current financial planning", and the only quantified direct-emissions lever is "fleet electrification −1,500" in the 2030-35 tranche.	**Increase**: an increase, not a reduction
Total emissions **up 1.8% year on year** (69,303 → 70,532) while the annual report reports "a 13% reduction … we are on track"	**Cannot** verify: baseline-framed reporting. The current-year increase is not stated in either document; it is only derivable by subtracting two columns of the emissions table.	**Increase**: an increase, not a reduction
Planned 2030 reduction, by lever, from the company's own roadmap: grid decarbonisation −43,000 t; onsite renewables and energy efficiency −18,000 t; the AGL power purchase agreement and Belmont renewable supply −14,000 t; tree-planting credits −3,000 t	**Mixed**: about 55% of the planned reduction is grid decarbonisation, movement Hunter Water does not cause. Own action is about 23%, contractual renewable instruments about 18%, and credits about 4%. Growth adds back about 15,500 t.	**Partly**: majority business-as-usual; own action is the minority share
The 2035 "net zero" endpoint	**Offsets**: gross emissions are projected to be *higher* in 2035 than in 2030, a 76% gross reduction falling to 74%, with the gap closed by credits: **26% of the 2035 target is tree-planting credits**.	**Partly**: net, not gross; a quarter is credits
Belmont Desalination Plant	Activity: adds about 6,500 t of Scope 2 in the near term before its renewable supply applies: a climate-adaptation asset that increases the footprint. The roadmap offsets that with only −3,500 t of "Belmont Desalination Plant renewable energy supply", leaving a permanent net increase of about 3,000 t on a market-based baseline, for an asset the same document twice states will run on 100% renewable electricity ("The plant is required to operate on 100% renewable electricity"; "assumed to be powered by 100% renewable energy per the NSW State Planning condition of consent, from commissioning and proving phases, through to operation"). The residual is not explained.	**Increase**: disclosed; **the residual is not reconciled to the plant's own 100%-renewable condition**

3.4 Trajectory over time

Hunter Water has published an annual report every year from 2019-20 to 2024-25, so the direction of travel can be traced across six periods, and it is less favourable than the headline suggests. Total Scope 1 and 2 fell from 81,026 t CO_2-e in 2020-21 to 70,532 in 2024-25, but the fall stalled and then reversed: 72,773 in 2022-23, 69,303 in 2023-24, then **back up to 70,532** this year. Underneath that, the two scopes have moved in opposite directions for four years, Scope 2 down 22% and Scope 1 **up 31%**, so the shrinking part of the footprint is the part the grid is decarbonising for the company and the growing part is the part the roadmap concedes is hard to abate. There is a hole in the series: the 2021-22 annual report launched the net-zero target but disclosed only a single whole-of-operations approximation ("Our operations emit around 80,000 tonnes of carbon dioxide a year") and no Scope 1, Scope 2 or inventory figure, and no later report republished a 2021-22 inventory, so that year is not trackable.

Two changes across periods matter and neither is disclosed in the current period. First, the target base year moved. The 2021-22 annual report set the interim target as "an 80 per cent net reduction by 2030 compared to 2005 levels", and the 2022-23 annual report repeated "compared to **2005** levels" against a baseline of 82,097 t CO_2-e; from 2023-24 the baseline became 2020-21 at 81,026, with no restatement note, while the current climate report's own target table states the base period as **2021-22** again and its roadmap appendix uses a third value, 79,000, on the market-based method. The 2005 base was therefore in force for at least two reporting periods. Second, the endpoint moved out five years: the 2019-20 annual report set an aspirational goal "to be carbon neutral by 2030", the 2020-21 report described "our goal to have net zero emissions by 2030", and from 2021-22 the commitment became net zero by **2035** with an 80% interim target at 2030. Neither the weakening nor the base-year change is reconciled anywhere in the current disclosure.

One further shift, and two series breaks. The 2023-24 annual report named "the decarbonisation of the NSW electricity grid" as a driver of progress; this year's climate report attributes the reduction to onsite solar alone, even as its own appendix still names grid decarbonisation as the primary driver of the pathway (§3.3). Beyond that, **the onsite-generation series does not reconcile across three successive annual reports.** The 2022-23 annual report states, for 2022-23, the *identical* capacity and generation figures the 2021-22 report gave for 2021-22 ("Expanded our total renewable energy

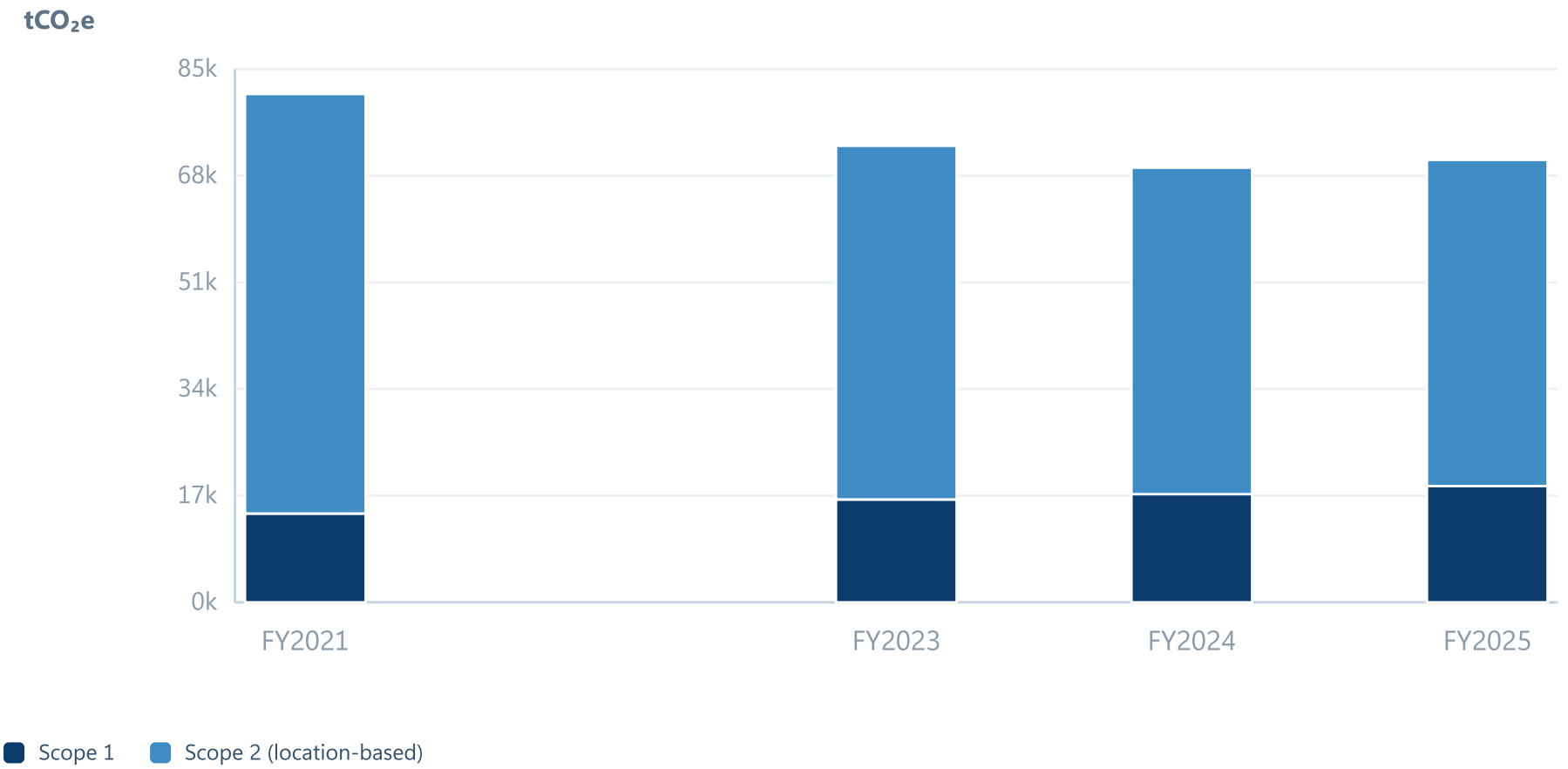
generation capacity to 1.74 MW and generated 1,685MWhr of renewable energy"), and the 2023-24 report then states "Increased total onsite electricity generation to 4.05GWh, **a 25% increase year on year**". Against the last disclosed prior year of 1,685 MWh that is **an increase of 141%, not 25%**; a 25% increase implies an undisclosed prior year of about 3,243 MWh. Either the 2022-23 figure is a stale repeat or the 25% is wrong, and neither is corrected. The same bullet list also does not close on capacity: "Commissioned an additional 400kW of solar" against a prior-year capacity of 1.74 MW gives 2.14 MW, but the next bullet states "Expanded our total renewable energy generation capacity to **2.96MW**", an unexplained 0.82 MW. Both breaks sit under the capacity series this review uses to establish that capacity roughly doubled in 2024-25. Prior-year reports are context only; the rating is derived from 2024-25.

Metrics over time

Trajectory over time

Reported operational emissions by scope, stacked, in tCO_2e per reporting year.

Source: Annual Reports 2020-21 to 2024-25; 2021-22 omitted, no inventory was ever published for that year



METRIC	FY2021	FY2022	FY2023	FY2024	FY2025	MOVEMENT	DRIVER	NOTE
Scope 1 (tCO_2e)	14,135	Not disclosed	16,395	17,270	18,516	Up: 31% since FY2021 (Hunter Water-operated component up 35.6%)	**Cannot** verify: no source-and-driver decomposition in any period	A real increase, not accounting. A generic population-growth driver is disclosed for the *projected* growth bar only; sulphur hexafluoride nil this year. 2021-22 never disclosed as an inventory
Scope 2 location-based (tCO_2e)	66,891	Not disclosed	56,378	52,033	52,016	Down: 22% since FY2021, flat in FY2025	**Cannot** verify: grid decarbonisation against own action **not separable**	Attribution changed between periods; the grid was named in 2023-24 and dropped in 2024-25
Scope 2 market-based (tCO_2e)	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not applicable	Not reported in any period. The basis the targets are set and tracked on; begins in 2025-26
Scope 3 total (tCO_2e)	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not applicable	Never quantified; "building out Scope 3 emissions data" flagged in 2023-24 and not delivered
Emissions intensity (none published)	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not applicable	No intensity metric published in any period
Renewable electricity (% of consumption)	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not applicable	Capacity reported instead of outcome: 1.74 MW and 1,685 MWh (2021-22); **the same two figures repeated verbatim for 2022-23**; 2.96 MW and 4,054 MWh (2023-24, stated as "a 25% increase year on year", arithmetically 141% on the last disclosed year); 6.4 MW installed (2024-25, generation not disclosed). The series does not reconcile
Certificates and offsets retired (tCO_2e)	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not applicable	No surrender disclosed in any period; no credits used against the target yet. About 45,000 credits stated generated 2017 to 2024; "up to 15,000 currently available"; registration status contradictory
Total Scope 1 and 2 (tCO_2e)	81,026	Not disclosed	72,773	69,303	70,532	Down: 13% since FY2021, **up 1.8% in FY2025**	**Mixed**: not separable from the disclosure	Baseline-framed; the current-year rise is not stated. 2021-22 never disclosed as an inventory. The 2022-23 annual report scorecard states 72,772

Targets and claims over time

TARGET OR CLAIM	AS FIRST STATED (PERIOD)	AS STATED FOR FY2025	CHANGE	EXPLAINED?	NOTE
Net-zero target	"Carbon neutral by 2030", aspirational (FY2020); "net zero emissions by 2030" (FY2021)	"net zero Scope 1 and 2 GHG emissions by 2035", a net target including ACCUs, "subject to confirmation of customer willingness to pay"	**Replaced**; Weakened; Re-scoped: the endpoint moved out five years to 2035 (from FY2022), narrowed to Scope 1 and 2, and a condition added	No: neither the weakening nor the base-year move is disclosed in the current period	No certification ever held. The 2035 endpoint is unfunded and 26% of it is tree-planting credits (F-10)
Interim 80% net reduction by 2030	"an 80 per cent net reduction by 2030 compared to 2005 levels" (FY2022)	"80% net reduction by 2030, relative to 2020-21 emissions levels"; base period stated across the suite as 2020-21 (81,026), 2021-22, and 2020-21 at 79,000 on the market-based method	**Rebased**: base year moved from 2005 (82,097) to 2020-21 (81,026)	No: no restatement note in any report	The audited annual report states it as an unqualified "80% reduction" (F-11, F-13)
"100% renewable electricity supply for our large sites by 2030"	Not stated in this review	"100% renewable electricity supply for our large sites by 2030, using contractual instruments", rated "On track" with 2024-25 performance "N/A"	Cannot verify: first-stated wording not in this review	Not applicable	Expressly includes the mandatory renewable share (F-14)
"13 MW installed renewable energy capacity by 2030"	Not stated in this review	"13 MW installed renewable energy capacity by 2030" (6.4 MW, "On track")	Cannot verify: first-stated wording not in this review	Not applicable	Already exceeded by capacity delivered and contracted (F-17)

TARGET OR CLAIM	AS FIRST STATED (PERIOD)	AS STATED FOR FY2025	CHANGE	EXPLAINED?	NOTE
Paris alignment of the targets	Not stated in this review	"aligned with the emissions reduction goals of the Paris Agreement"; "not been formally validated by an external body (e.g. Science Based Targets Initiative)"	Cannot verify: first-stated wording not in this review	Not applicable	Covers Scope 1 and 2 only (F-18)

4. Findings

4.1 What stands up (genuine / qualified positives)

▲ F–1

Hunter Water counts, and takes target accountability for, emissions the law does not require it to report. The water and wastewater treatment plants are operated by its contractor Veolia; under the statutory operational-control test those emissions fall outside Hunter Water's boundary and are reported by Veolia. Hunter Water includes them anyway, in its inventory *and* inside its targets, explaining that it "retains ownership, benefits directly from their operation, and holds overall accountability". Those plants are about two-thirds of Scope 1 and just under half of Scope 2: roughly half the total footprint.

WHY IT MATTERS

Reporting on the statutory boundary would have let Hunter Water disclose about 35,100 t CO_2-e instead of 70,532. It chose to roughly double its own reported footprint and accept target responsibility for the larger number. That is a boundary decision taken against its own interest, and it is the most substantive element in this disclosure.

QUALIFICATION (IF ANY)

The figures for those plants come from the contractor's own emissions report, which was not provided and is not independently verified, so the boundary is above baseline while the underlying data is cannot-verify.

▲ F–2

A real, physical, self-owned abatement asset: 6.4 MW of behind-the-meter solar completed, including the 3.1 MW Balickera Solar Farm commissioned late 2024, with a further 8.3 MW contracted at Cessnock and Shortland wastewater treatment works. Generation is consumed on site at energy-intensive assets rather than sold as an attribute.

WHY IT MATTERS

Behind-the-meter generation reduces location-based emissions physically, with no certificate or contractual instrument doing the work. It is the part of the pathway Hunter Water actually controls, and it is being built.

QUALIFICATION (IF ANY)

Substantially qualified: the emissions effect is never quantified, 2024-25 generation is not disclosed, the treatment of any certificates the systems create is not disclosed, and in the very year capacity roughly doubled Scope 2 fell by 17 tonnes. The asset is real; the reported effect is not evidenced.

▲

F–3

The 2030 abatement pathway is funded, not aspirational, and the funding passed an independent economic regulator inside the period. "Funding to progress our Climate Program has been included in the 2025-30 price determination by IPART and Hunter Water's 2025-26 Business Plan … including investment to implement initiatives outlined in the Net Zero Roadmap, to reduce net Scope 1 and 2 emissions by 80% by 2030 … With inclusion in IPART's 2025-30 pricing determination, the initiatives will be funded through customer fees and charges". IPART released its final determination in June 2025. The roadmap legend separates "Emissions reduction (approved)" from "Emissions reduction opportunity (future decision)", so the funded share is identifiable.

WHY IT MATTERS

This is a capital allocation already made and externally approved, not a statement of intent. It is recovered through customer bills, an action against the entity's own affordability interest that had to survive an independent price determination. It is a decision taken, not a disclosure made.

QUALIFICATION (IF ANY)

Qualified. The determination itself and the roadmap's lever costings were not provided, so the funded and contingent split cannot be sized, and the **2035** endpoint is expressly outside it. Credited for the 2030 tranche only.

▲

F–4

An external body with a defined role in rating the entity's own emissions performance, established in the period. The 2025-30 customer report card includes, under "Environmentally sustainable", the measure "% reduction in carbon dioxide equivalent emissions compared to a 2020-21 baseline". Hunter Water then committed to establish an ongoing Community Committee of approximately 50 members "representative of the demographics of our area of operations", which "will help keep us accountable for the delivery of our Customer Outcomes and annual performance assessment" and whose first function is to "Recommend a performance rating for each outcome on our customer report card". The inaugural meeting was held in June 2025.

WHY IT MATTERS

This is a structural answer to the central weakness elsewhere in the disclosure, that the entity supplies its own contested performance status. An external standing body that recommends the rating is a mechanism that constrains the entity's own account. It is not disclosure, candour or a certification.

QUALIFICATION (IF ANY)

Qualified and forward-looking: reporting on the customer report card commences for the 2025-26 financial year, so no emissions rating has yet been produced under it, and the committee's recommendations are not binding. The committee's stated channel to the price regulator sits under its third function, consultation on mid-period changes to the measures, not under the rating function, so the credit is taken on the rating role alone.

▲

F–5

The roadmap discloses its own lever composition and its own gross figures, including that gross reductions reach only 76% by 2030 and fall back to 74% by 2035, that credits deliver 4% of the 2030 target and 26% of the 2035 target, and that grid decarbonisation is the single largest lever.

WHY IT MATTERS

Most of the adverse findings in this review are only findable because Hunter Water published the components. A disclosure that shows a reader how little of its own pathway it controls is doing something unusual.

QUALIFICATION (IF ANY)

A *qualified* positive at most: the same document's performance narrative then attributes the reduction to onsite solar alone, and the annual report reports "on track", so the roadmap's candour is not carried into the claims a reader meets first.

4.2 What does not stand up (negatives)

▼ F–6

Neither published performance status can be tested. The annual target the red status on page 34 is measured against is quantified nowhere in the reporting suite: greenhouse gas emissions does not appear at all in the page 16 corporate scorecard's actual, target and status table, and the page 34 sub-measure table has no target column. And the page 56 G and the climate report's "N/A" are about the same 80%-by-2030 target and cannot both be right: page 56 grades it G on a location-based result while the same page's own footnote states "Target is based on the market-based greenhouse gas emissions calculation methodology", which is precisely the reason the climate report declines to assess it.

WHY IT MATTERS TO A READER

A reader can follow the red to the green, because the sentence beneath the red reconciles the two and cross-references page 56, but cannot test either: one is measured against a target that is never published, and the other grades a market-based target on a location-based number that the company's own climate report says cannot yet be used for that purpose.

WHAT WOULD FIX IT

Publish the annual emissions target and the result against it; and either grade the 80%-by-2030 target on its own market-based basis in both documents, or record it as not yet assessable in both.

▼ F–7

Alongside the red status, the annual report states "we are on track to meet our 2030 commitment", in a year total emissions rose 1.8% (69,303 → 70,532), Scope 2 was flat and Scope 1 rose 7.2%. The current-year increase appears nowhere in either document; it is only derivable by subtracting two columns of the emissions table.

WHY IT MATTERS TO A READER

The "13% reduction" framing is true against a five-year-old baseline but hides the direction of travel in the period being reported. A reader is told the company is progressing while it went backwards.

WHAT WOULD FIX IT

State the year-on-year movement beside the baseline movement, and reconcile the "on track" assertion to the annual pathway the target implies.

▼ F–8

About 55% of the planned 2030 reduction is grid decarbonisation: on Hunter Water's own roadmap, −43,000 t CO_2-e of a total 78,000 t CO_2-e reduction effort, against own action of about 23% and renewable contracts of about 18%. Yet the current-year narrative attributes the reduction to "increased onsite solar generation" alone, dropping the grid attribution the prior-year annual report disclosed, while the roadmap appendix in the same document still names grid decarbonisation as the primary driver.

WHY IT MATTERS TO A READER

Most of what the company will report as progress is movement it does not cause and would receive by doing nothing. The body narrative names only the second of the five drivers its own appendix lists and drops the one the appendix calls primary, and the appendix's own period and method are never stated beside the body's.

WHAT WOULD FIX IT

Restore and quantify the grid-decarbonisation attribution in the performance narrative, and report own action separately from external movement in every period.

▼ F–9

Scope 1 has risen 31% since the baseline (14,135 → 18,516) and 7.2% in this year alone, with no source-and-driver decomposition of the actual increase anywhere; the only driver disclosed is a generic, forward-looking "population growth leading to additional operational activity" attached to the roadmap's *projected* growth bar. Sulphur hexafluoride was nil. On the document's own source mapping the fastest-growing part is Hunter Water's own liquid-fuel and natural-gas combustion, not the process emissions: Hunter Water-operated Scope 1 is up 35.6% on baseline and 17.3% in one year, against 28.6% and 2.4% for the contractor-operated column. The roadmap names methane capture, biogas, renewable natural gas, waste-to-energy and fleet electrification as opportunities, but states that "Not all of the identified opportunities have been costed or included in current financial planning", and the only quantified direct-emissions lever is "fleet electrification −1,500" in the 2030-35 tranche.

WHY IT MATTERS TO A READER

The growing part of the footprint is the part with no funded lever, and on the entity's own attribution the fastest-growing component is its own fossil-fuel burning. Scope 1 has gone from 17% to 26% of the total. A reader has no basis to judge whether the 2035 endpoint is reachable.

WHAT WOULD FIX IT

Explain the Scope 1 increase by source and driver, split fleet, plant and boiler combustion from process emissions in the reported series, and cost and date the wastewater and fleet levers already identified as opportunities.

▼ F-10

The 2035 net-zero endpoint is neither funded nor decided. Funding for the 2030 interim target sits in the current price determination; the 2035 target expressly requires "further emissions reduction investment decisions … in our Price Path 2030 (PP30) … pending customer willingness to pay", and the target itself is stated throughout as "subject to confirmation of customer willingness to pay".

WHY IT MATTERS TO A READER

A commitment contingent on a future price determination and a future willingness-to-pay test is materially weaker than the word "target" conveys. The condition is stated, but its consequence, that the endpoint may simply not be pursued, is not.

WHAT WOULD FIX IT

State plainly which parts of the pathway are funded and which are contingent, what happens to the target if the willingness-to-pay test is not met, and what the fallback is.

▼ F-11

The target base year is unstable across the reporting suite. The 2021-22 annual report set the interim target as "an 80 per cent net reduction by 2030 compared to 2005 levels" and the 2022-23 annual report repeated "compared to 2005 levels" with a baseline of 82,097 t CO_2-e; from 2023-24 the baseline became 2020-21 at 81,025 or 81,026 t CO_2-e with no restatement note; the current climate report's own target table states the base period as 2021-22; and its roadmap appendix uses 79,000 on the market-based method. Separately, the endpoint moved from "carbon neutral by 2030" and "net zero emissions by 2030" to net zero by 2035, and neither the base-year change nor the five-year deferral is reconciled in the current disclosure.

WHY IT MATTERS TO A READER

Progress cannot be measured against a baseline that moves, and a target that quietly slipped five years reads as a commitment held rather than a commitment weakened.

WHAT WOULD FIX IT

Publish one base year with its value and method, reconcile the 2005 and 2020-21 baselines, correct the 2021-22 reference, and disclose the change of endpoint from 2030 to 2035 with its reason.

▼ F–12

Performance is reported location-based, the targets are set and will be tracked market-based, and no market-based figure has been reported for any period. The AGL power purchase agreement operated for half of this reporting period with no market-based number to show its effect.

WHY IT MATTERS TO A READER

Progress against the 80%-by-2030 target is not measurable this year on the company's own method, which is why the climate report records performance as not available. A reader has no way to know where the company stands against the target that matters.

WHAT WOULD FIX IT

Publish market-based Scope 2 for the baseline and the current year alongside location-based, as the report undertakes to do from 2025-26, and restate progress on the target's own basis.

▼ F–13

The audited annual report never discloses that the 2030 target is a net target, or that carbon credits are part of it. The climate report is explicit: "Both our 2035 target and our interim 2030 target are net targets, meaning they include the use of carbon offsets to compensate for hard-to-abate or unavoidable Scope 1 emissions", with a footnote stating "4% of the 2030 target and 26% of the 2035 target will be met through ACCUs (tree planting projects)". The annual report states the same target three times and never uses the word "net": the customer report card measure is "% reduction in carbon dioxide equivalent emissions compared to a 2020-21 baseline"; the Balickera narrative is "advance our goal to reduce our greenhouse gas emissions by 80% by 2030"; and the sustainability scorecard's target column reads "80% reduction by 2030". Full-text search of the annual report returns no instance of "ACCU", "carbon credit" or "carbon offset": the credit leg of the target does not exist in that document.

WHY IT MATTERS TO A READER

The target wording is accurate in the climate report and not in the document most readers open. In the annual report the 2030 commitment reads as an 80% cut in actual emissions; in the climate report it is an 80% *net* cut of which a share is tree-planting credits, against a pathway whose *gross* reduction is projected at 76%. The green status is awarded against the version with no credits in it, and the customer report card the Community Committee will rate carries the same unqualified form.

WHAT WOULD FIX IT

State "net" and the credit share wherever the 2030 target appears in the annual report and on the customer report card, and disclose the projected gross reduction beside it.

▼ F–14

The "100% renewable electricity supply for our large sites by 2030" target expressly includes the mandatory renewable share. The roadmap assumption states the agreement will "scale up to 100% of LGCs for all large-scale asset consumption by 2030, inclusive of mandatory obligations under Australian Government DCCEEW Large-Scale Renewable Energy Target (Renewable Power Percentage)".

WHY IT MATTERS TO A READER

The renewable power percentage is the statutory obligation already embedded in every electricity customer's supply. Counting it inside a voluntary "100% renewable" commitment means the voluntary increment is smaller than the claim implies, and the report does not disclose the split.

WHAT WOULD FIX IT

Disclose the target split between the mandatory renewable power percentage and voluntary additional certificates, and state the voluntary increment separately.

▼ F–15

The report is presented as quality-assured without being assured. Page 5 describes an external systems assessment by a specialist consultancy, a government-coordinated external review giving "positive feedback on the fairness and connectivity of our disclosures", and a legal advisory firm "concluding our 2024-25 CRFD is well prepared and comprehensive". None of those is assurance over the emissions figures, and eighteen pages later a footnote records that the figures "have not been independently verified by a third party".

WHY IT MATTERS TO A READER

A reader meets three favourable external opinions on the disclosure before meeting the fact that no number in it has been verified. None of the reviewers is named, none of the conclusions is published, and none can be tested.

WHAT WOULD FIX IT

Obtain assurance over the emissions figures, disclose its scope and level beside the figures, and state plainly at the front of the report what the three reviews did and did not cover.

▼ F–16

Installed capacity and process maturity are presented as climate performance. The target table contains four target lines and rates three of them "On track": 13 MW of installed renewable capacity; climate-risk maturity, on a self-assessment; and "100% renewable energy electricity supply for our large sites (PPA)", whose own reporting-period performance cell reads "N/A" and whose footnote states that "tracking progress towards our renewable energy target from contractual instruments will begin in the next reporting period", so a status is asserted for a target the same table says is not yet being tracked. Neither capacity nor maturity is an emissions outcome, and the only emissions-outcome row in that table records performance against target as not available.

WHY IT MATTERS TO A READER

Three of the four target lines are shown as on track: two measure effort and process, one is not yet tracked at all, and the only one that measures emissions cannot be assessed. That reads as progress where none is demonstrated.

WHAT WOULD FIX IT

Report the emissions effect of the installed capacity in t CO_2-e; label capacity and maturity as input and process measures; and record the power purchase agreement target as "not yet tracked" rather than "On track" until the tracking the footnote describes begins.

▼ F–17

The 13 MW-by-2030 renewable-capacity target is already exceeded by capacity delivered and contracted, on the same page that sets it. The page sets the target as "an absolute installed renewable energy capacity of 13 MW by 2030", and in the two bullet points immediately beneath it reports that Phase 1 is "completed, delivering 6.4 MW" and that Phase 2 "has commenced, with contracts awarded … This phase includes 8.3 MW of new renewable energy". That is 14.7 MW, five years early and already under contract. The target table nonetheless rates the target merely "On track" at 6.4 MW.

WHY IT MATTERS TO A READER

A target that contracted work has already overtaken is not ambition; it is a report of work in hand. Presented as a 2030 goal and rated "On track", it reads to a non-expert as future effort. This is the same page that carries the only emissions-outcome row, which is rated not available.

WHAT WOULD FIX IT

Reset the capacity target above the delivered-plus-contracted position, or retire it and report installed capacity as an activity metric; and state the t CO_2-e effect the capacity is expected to deliver.

▼ F–18

The targets are described as "aligned with the emissions reduction goals of the Paris Agreement" and "informed by … science-based target-setting methodologies for annual decarbonisation", on a boundary that excludes the entire value chain, an endpoint a quarter delivered by credits, and gross emissions that rise between 2030 and 2035. Validation is expressly disclaimed.

WHY IT MATTERS TO A READER

"Paris-aligned" carries an impression of rigour the underlying mechanics do not support, and disclosing the absence of validation does not narrow the claim itself.

WHAT WOULD FIX IT

Either substantiate the alignment against a stated methodology and boundary, or describe the targets as informed by state and federal commitments without the Paris-alignment label.

▼ F–19

A net target is disclosed with no associated gross target. The report states "Hunter Water does not have a formal gross GHG emission reduction target" and offers projections instead, 76% gross by 2030 and 74% by 2035, while the framework it reports under requires an entity disclosing a net target to separately disclose its associated gross target. No permanence basis is disclosed for the credits either, though the framework names permanence expressly as a factor users need to judge credit integrity.

WHY IT MATTERS TO A READER

Without a gross target nothing holds the abatement side of the pathway to account, only the net result, which credits can always close. The projections are explicitly contingent on investment decisions not yet made.

WHAT WOULD FIX IT

Set and disclose a gross Scope 1 and 2 reduction target alongside the net target, and disclose the permanence, reversal and buffer basis for the credits relied on.

▼ F-20

The annual report's own onsite-generation series does not reconcile, and the entity's headline renewable-progress numbers are not like-for-like. The 2022-23 annual report reports for 2022-23 the identical capacity and generation the 2021-22 report reported for 2021-22 ("Expanded our total renewable energy generation capacity to 1.74 MW and generated 1,685MWhr of renewable energy"). The 2023-24 report then states "Increased total onsite electricity generation to 4.05GWh, a 25% increase year on year", which is an increase of 141% against the last disclosed year and implies an undisclosed prior year of about 3,243 MWh. The same bullet list also states "Commissioned an additional 400kW of solar" and "Expanded our total renewable energy generation capacity to 2.96MW" from a prior-year 1.74 MW: an unexplained 0.82 MW.

WHY IT MATTERS TO A READER

Onsite solar is the entity's single genuine own-action lever and the one it credits its reduction to. The series used to evidence it contains a repeated year, a growth rate that does not match its own denominator, and a capacity step that does not add up, and 2024-25 generation was then not published at all.

WHAT WOULD FIX IT

Restate the onsite generation and capacity series on one basis for every period, identify which prior-year figure the 25% increase was measured against, reconcile the 0.82 MW, and publish 2024-25 generation with the self-consumed and exported split.

▼ F-21

The rationale for excluding the treatment-plant emissions from statutory reporting changed between periods, and the earlier account is wrong on its face. The climate report says it is a boundary question: "For NGER emissions reporting, Hunter Water's emissions boundary is defined strictly in accordance with the NGER Act's operational control test, and as such, emissions from our water and wastewater treatment plants are excluded and instead reported by Veolia". The prior annual report says it is a categorisation question: "For measuring and managing our carbon emissions, Hunter Water classifies emissions from wastewater treatment as Scope 1. However, other reporting frameworks, like NGER, categorise these emissions as Scope 3". The statutory scheme has no Scope 3 category at all.

WHY IT MATTERS TO A READER

The boundary election is this disclosure's strongest above-baseline positive, and the reason given for it changed between two consecutive reports without reconciliation, from a statement that is not correct to one that is. A reader tracking the series is told two different things about the same exclusion.

WHAT WOULD FIX IT

State the operational-control basis consistently across periods, and correct or withdraw the prior-year characterisation.

▼ F–22

The roadmap books a permanent net emissions increase for an asset the same document says will be entirely renewable-powered. The roadmap chart shows "Belmont Desalination Plant +6,500" growth against a market-based baseline, offset by only "Belmont Desalination Plant renewable energy supply −3,500", a residual of about +3,000 t CO_2-e. Yet the same report states "The plant is required to operate on 100% renewable electricity", and the roadmap assumption states the plant "is assumed to be powered by 100% renewable energy per the NSW State Planning condition of consent, from commissioning and proving phases, through to operation". The roadmap also dates first water to "late 2027" while the annual report's customer report card sets the target "First water by June 2028" and the climate report body says commissioning is "on schedule for 2028".

WHY IT MATTERS TO A READER

Either the 100%-renewable condition does not fully apply, or the roadmap's largest single growth item is overstated by about 3,000 t CO_2-e a year. Both bear directly on the 80%-by-2030 arithmetic, and neither is reconciled.

WHAT WOULD FIX IT

Reconcile the Belmont growth and renewable-supply bars against the planning condition on one stated method, and state one first-water date across the suite.

▼ F–23

The climate report's own narrative list of Scope 1 sources is incomplete against its own methodology table. The narrative states "our total Scope 1 emissions are from" three sources: wastewater methane and nitrous oxide, sulphur hexafluoride from gas-insulated switchgear, and "the combustion of liquid fuel in company vehicles, plant and machinery". The methodology table discloses a fourth: "Natural gas used in boiler", with its own calculation method.

WHY IT MATTERS TO A READER

Minor in magnitude but not in kind: the sentence a reader relies on to know what is inside Scope 1 is exhaustively framed ("our total Scope 1 emissions are from") and is not exhaustive. It also removes from view a stationary fossil-fuel source with no disclosed cessation pathway.

WHAT WOULD FIX IT

Complete the narrative source list to match the methodology table, and disclose the boiler's fuel volume and replacement pathway.

4.3 What cannot be verified

?

F–24

The split of the reported 13% reduction between Hunter Water's own abatement and the decarbonisation of the New South Wales grid.

WHY IT IS OPEN

Electricity consumption in MWh and the grid emission factors applied are not disclosed for any period, so the decomposition cannot be computed from the disclosure. The company's own roadmap indicates grid decarbonisation is the dominant lever, but the historical split is not published.

WHAT WOULD RESOLVE IT

Annual electricity consumption by site class and the grid emission factor applied in each period, with the reduction decomposed into consumption change, factor change and market instruments.

?

F–25

The carbon credits the 2035 endpoint depends on. Registration status is stated two contradictory ways in one document: "The project was registered with the Clean Energy Regulator" against "Hunter Water is currently working with the Clean Energy Regulator to register ACCUs". Volume is also unreconciled: about 45,000 credits stated as generated over 1 July 2017 to 30 June 2024 by a January 2025 third-party audit, against "up to 15,000 ACCUs … currently available".

WHY IT IS OPEN

No issuance, holding or retirement records were provided, and the two statements in the document cannot both be right.

WHAT WOULD RESOLVE IT

Project registration details, the issuance record, the current holding, and a reconciliation of the 45,000 generated against the 15,000 available.

?

F–26

Whether the credits can survive to deliver a 2035 claim. The plantings sit at Chichester and around Grahamstown Dam; the same report identifies bushfire as a material physical risk to assets in bushfire-prone zones. No permanence period, reversal-risk buffer or carbon-maintenance basis is disclosed.

WHY IT IS OPEN

Permanence is not addressed anywhere in the document.

WHAT WOULD RESOLVE IT

The permanence period, reversal-risk treatment, buffer arrangements, and how bushfire exposure to the planting sites is managed.

?

F–27

Whether enough credits exist for the pathway at all. The 2035 endpoint needs roughly 20,500 t CO_2-e of credits annually, the report saying "ongoing annual surrendering of ACCUs will likely be required to maintain net emissions reduction levels from 2029-30 onwards", against a project that generated about 6,400 a year and has 15,000 available. The gap is filled in the roadmap by a new, undecided planting project on company land at Terreel.

WHY IT IS OPEN

The Terreel project is a future investment decision "pending customer willingness to pay"; no area, method, yield or timing is disclosed.

WHAT WOULD RESOLVE IT

The credit supply plan: the annual requirement, the existing project's yield, and the Terreel project's method, area, expected yield and decision date.

?

F–28

Whether the credits are additional and separable from the entity's own boundary. They are self-generated on Hunter Water's own land, from a project funded by a 2013 Commonwealth grant, and are to be surrendered against Hunter Water's own emissions.

WHY IT IS OPEN

No additionality basis is disclosed, and the arrangement is not distinguished from in-boundary sequestration.

WHAT WOULD RESOLVE IT

The additionality basis under the applicable method, and a statement of how self-generated, self-surrendered credits are treated against the target.

?

F–29

Whether the roadmap's grid-decarbonisation and renewable-contract levers overlap. The baseline is stated as market-based, yet the roadmap books −43,000 t CO_2-e from grid decarbonisation and −14,000 t CO_2-e from renewable electricity contracts. Under market-based accounting, electricity matched with certificates is already zero-rated and cannot also yield a grid-decarbonisation saving.

WHY IT IS OPEN

The report does not show how the two levers are prevented from applying to the same electricity.

WHAT WOULD RESOLVE IT

A lever-by-lever reconciliation on a single stated method, showing the electricity base each lever applies to.

?

F-30

Renewable energy certificates. The financial statements recognise "renewable energy certificates received" as a non-cash item in both 2023-24 and 2024-25, at $(59)k for 2025 and $(201)k for 2024, but no volume, no register and no disposition, whether retained, retired or sold, is disclosed anywhere. Whether the onsite solar systems create certificates, and what happens to them, is not stated. The recognised value fell 71% in the very year onsite solar capacity roughly doubled, unexplained and unreconciled to any certificate count.

WHY IT IS OPEN

No certificate register or retirement record was provided; what is missing is the volume, the register and the disposition, not the dollar amount.

WHAT WOULD RESOLVE IT

A certificate register: creation, ownership, transfer, surrender, beneficiary and reporting period, reconciled to consumption and to the amounts recognised in the financial statements.

?

F-31

Roughly two-thirds of Scope 1 and just under half of Scope 2. These come from a contractor's emissions report that was not provided, is not independently verified, and cannot be reconciled to the contractor's group statutory row, which is not attributable to Hunter Water's plants.

WHY IT IS OPEN

The contractor's report was not provided and no verification of it is described.

WHAT WOULD RESOLVE IT

The facility-level contractor emissions report, and a statement of what verification Hunter Water performs over it.

?

F–32

The magnitude of Scope 3. No category is quantified and no bounding estimate exists, so it is not possible to say whether the excluded value chain is larger or smaller than the 70,532 t CO_2-e reported, only that capital goods, purchased goods and grid losses are obviously material for this business.

WHY IT IS OPEN

Scope 3 has never been quantified in any period. The framework does not require it in year one, so this is a decision-usefulness gap rather than a compliance one.

WHAT WOULD RESOLVE IT

A category-level Scope 3 screening estimate with a total, even spend-based, and a stated exclusion list with reasons.

?

F–33

2021-22 emissions. That year's annual report launched the net-zero-2035 target but disclosed only one whole-of-operations approximation, "Our operations emit around 80,000 tonnes of carbon dioxide a year", and no Scope 1, Scope 2, boundary or method, and no later report republished an inventory for that year.

WHY IT IS OPEN

No disaggregated inventory was ever published for the period the climate report's target table names as its base period, and a restatement cannot be assumed.

WHAT WOULD RESOLVE IT

The 2021-22 Scope 1 and Scope 2 figures on the current boundary.

?

F–34

The financial effect of climate risk. The report states no material impacts on the business model, financial position or performance were identified in the period, and that "material asset revaluations or impairments are considered unlikely", while describing a 40-year water security plan, a desalination plant under construction to address drought risk, and an asset-level vulnerability assessment that identified vulnerable assets. Neither the conclusion nor the exposure is quantified.

WHY IT IS OPEN

The no-material-impact conclusion and the climate-driven capital programme are not reconciled, and the government dashboard pilot that would quantify exposure is still in progress.

WHAT WOULD RESOLVE IT

Quantified financial exposure by asset class from the dashboard pilot, and a reconciliation of the no-material-impact conclusion to the adaptation capital programme.

?

F–35

Whether the risk assessment covers the transition side. Risks were assessed across three horizons using a single high-emissions scenario (RCP 8.5). No lower-emissions or orderly-transition scenario is applied, though transition risk is one of the two risk types identified.

WHY IT IS OPEN

Only one scenario is described; the report states quantitative scenario analysis is future work.

WHAT WOULD RESOLVE IT

Scenario analysis across at least one low-emissions and one high-emissions pathway, with the transition risks tested against the low-emissions case.

5. Disclosure risk exposure

5.1 Risk read

Hunter Water's disclosure exposes the company, and a reader relying on it, most through internal inconsistency rather than through overreaching ambition. The target language in the climate report is unusually careful, being net, Scope 1 and 2 only, and conditional on customer willingness to pay, and the boundary is deliberately wider than the law requires. The exposure comes from what sits around that. The single biggest driver is that the entity publishes performance statuses that cannot be tested: a **red** against an annual target quantified nowhere in the suite, and a **green** against the 80%-by-2030 target computed on a location-based number that the same page's own footnote says is not the target's basis, which is the basis on which the climate report declines to assess the same target at all. Around that sit a base year stated as 2005, 2020-21 and 2021-22 across the suite, with 2005 in force from the 2021-22 annual report onward; a performance narrative attributing the reduction to onsite solar in the very year onsite capacity roughly doubled and Scope 2 did not move; a target endpoint that slipped five years without reconciliation; the same 2030 target stated as a *net* target in the mandated climate report and as an unqualified reduction target three times in the audited annual report; a carbon-credit programme whose registration status is asserted two contradictory ways in one document; and an onsite-generation series that repeats a year, states a growth rate its own denominator does not support, and does not add up on capacity. Because Hunter Water is a State Owned Corporation reporting under a NSW Treasury mandate rather than to a securities market, the classic securities and consumer-law exposure is narrower than it would be for a listed entity, but the report is public, it sits alongside a price

submission funded through customer bills, and its accuracy is a matter for the entity's shareholder, its economic regulator and the Auditor-General. None of the following is an allegation of misconduct; each is a risk a reasonable reader, regulator or director should be able to see.

5.2 Risk by lens

Risk exposure by lens

Relative exposure across disclosure-risk lenses; see the table for what drives each and what would reduce it.

Source: Review analysis of the 2024-25 disclosure suite

Legal (misleading-conduct / disclosure / director-duty)	**Low to moderate**	Medium confidence
Regulatory (ASIC / ACCC / Clean Energy Regulator / NSW Treasury)	**Moderate**	Medium confidence
Technology (dependence on unproven abatement)	**Moderate to high**	Medium to high confidence
Physical (physical-risk disclosure consistency)	**Low to moderate**	Medium confidence
Other: assurance and third-party data dependence	**Moderate to high**	High confidence

LENS	EXPOSURE	CONFIDENCE	WHAT DRIVES IT	WHAT WOULD REDUCE IT
Legal (misleading-conduct / disclosure / director-duty)	Low to moderate	Medium	The entity is not a Chapter 2M reporting entity and does not market to consumers on climate grounds, so consumer-law and securities exposure is narrow. What remains is director and accountable-officer exposure on the accuracy of a public statutory-suite disclosure: a red status against a target the suite never publishes and a green status the companion climate report says cannot yet be given; an "on track" assertion in a year emissions rose; a base year stated three ways; the 2030 target stated as net in one document and unqualified in the audited one; and an onsite-generation series in successive annual reports that does not reconcile. The Board is described as providing continuous oversight of these disclosures.	Publish the annual target and the result against it; grade the 2030 target on one method in both documents; state the year-on-year movement; publish one base year with its value and method; state "net" and the credit share wherever the target appears; restate the generation series; and disclose the change of endpoint from 2030 to 2035.
Regulatory (ASIC / ACCC / Clean Energy Regulator / NSW Treasury)	Moderate	Medium	Two substantive gaps against the mandatory NSW framework: a net target disclosed without an associated gross target, and no permanence basis for the credits the target relies on. Pathway funding sits inside a price determination recovered through customer charges, so roadmap credibility is a regulatory matter as well as a reporting one. Clean Energy Regulator exposure attaches to the credit project, whose registration status is stated inconsistently. Hunter Water does not appear on the statutory register for the period, consistent with sitting below threshold on its own statutory boundary, but the report's repeated statutory framing may lead a reader to infer regulator-verified reporting that does not exist.	Set a gross target; disclose the permanence and reversal basis; confirm and correct the registration statement; and state plainly that the statutory methodology is used as a calculation basis rather than as a regulator-verified submission.

LENS	EXPOSURE	CONFIDENCE	WHAT DRIVES IT	WHAT WOULD REDUCE IT
Technology (dependence on unproven abatement)	Moderate to high	Medium to high	The abatement side of the pathway depends on things not yet decided or built: 8.3 MW of contracted but unbuilt solar, the Belmont plant's renewable supply, and, for the endpoint, a new tree-planting project at Terreel that is a future investment decision pending a willingness-to-pay test. Wastewater process emissions, the growing part of Scope 1, have no disclosed abatement lever other than credits, and the report itself names "treatment options for fugitive emissions" as a technology and cost risk. Gross emissions are projected to rise between 2030 and 2035.	Disclose the abatement pathway for wastewater process emissions separately from credits; disclose the Terreel project's method, area, yield and decision date; and publish the credit requirement against credit supply, year by year.
Physical (physical-risk disclosure consistency)	Low to moderate	Medium	Physical risk is the most developed part of this disclosure: an asset-level vulnerability assessment completed, regional projections in the supply models, the government dashboard pilot underway, and the concentration risk stated plainly, over 80% of drinking water from the Williams River catchment. Exposure arises from consistency rather than coverage: a single high-emissions scenario, no quantified financial effect, an unreconciled statement that impairments are unlikely, and the annual report's disclosure that Grahamstown Dam's top water level was progressively lowered to about 82% capacity, a dam-safety decision rather than a climate one, but one that reduces storage headroom in the drought-exposed system the climate report assesses, without being referenced there.	Quantify physical-risk financial exposure from the dashboard pilot; add a low-emissions scenario; reconcile the no-material-impact conclusion with the adaptation capital programme; and reference the reduced storage headroom in the water-security risk assessment.
Other: assurance and third-party data dependence	Moderate to high	High	No emissions figure is assured, and the report says so. Roughly two-thirds of Scope 1 and just under half of Scope 2 rest on a contractor's unverified report. Three favourable external reviews of the report are described at page 5 in terms a reader may take for assurance, and the internal audit was still only planned for December 2025.	Obtain assurance over the emissions figures; describe what the three reviews covered beside the figures they do not cover; and disclose the verification performed over the contractor's data.

5.3 Consistency across audiences

CLAIM / METRIC	TO THE REGULATOR	TO INVESTORS / PUBLIC	CONSISTENT AFTER NORMALISING BOUNDARY?
Scope 1 and location-based Scope 2, 2024-25	Not on the statutory register for the period. On its own statutory boundary, excluding the contractor-operated plants, Hunter Water's Scope 1 and 2 is about 35,100 t CO_2-e, below the 50 kt corporate threshold, so absence is consistent with sitting below threshold. Absence is not zero.	70,532 t CO_2-e on a deliberately wider boundary that includes the contractor-operated plants	Yes: a boundary difference, and one disclosed and explained. The wider figure is the more complete one.
Emissions-target performance, 2024-25	Climate report (the NSW Treasury-mandated document): reporting-period performance **"-13%"**; performance against target **"N/A"**, footnoted to the location-versus-market-based basis	Annual report page 34 sub-measure table: **R**, with **no target stated on the page**, and the adjoining narrative saying "While short of our annual target, we are on track to meet our 2030 commitment. More detail can be found on page 56". Annual report page 56 sustainability scorecard: **G** against a stated target of "80% reduction by 2030", on a location-based result, with a footnote stating the target is set on the market-based method.	Partly. The R and the G are against **different targets** and the annual report says so and cross-references the reader, so there is no contradiction between the two pages. What is **not** reconciled: the annual target behind the R is never quantified anywhere in the suite; and the page 56 **G** and the climate report's **"N/A"** are about the **same** 80%-by-2030 target and are incompatible, one grading it on a method the other says cannot yet be used for that purpose.
Target base year	Climate report Table 3: base year 2020-21 (81,026). Climate report Table 4: base period **2021-22**. Climate report Appendix A: 2020-21 baseline **79,000**, market-based.	2021-22 annual report: "80 per cent net reduction by 2030 compared to 2005 levels". 2022-23 annual report: **2005**, 82,097, targets "compared to 2005 levels". 2023-24 and 2024-25 annual reports: 2020-21, 81,025 and 81,026.	No: five statements across the suite, three base periods and three values on two methods, with no restatement note. The 2005 base ran for at least two periods.
Driver of the reduction	Climate report Appendix A (2020-21 to 2029-30, market-based): the reduction "primarily results from grid decarbonisation, **the roll out of Hunter Water Phase 1 and 2 Onsite Renewable Energy Program**, the AGL renewable PPA for large sites and the Belmont Desalination Plant and energy efficiency and process optimisation initiatives"	Climate report body (realised 2024-25, location-based): "driven by increased onsite solar generation, consumed directly on site". 2023-24 annual report: energy efficiency, the Renewable Energy Program "and the decarbonisation of the NSW electricity grid".	Partly: the body names only the second of the appendix's five drivers and omits the one the appendix calls primary; the periods and methods differ and neither is stated beside the other; and the grid attribution disclosed the prior year was dropped.
Effect of the AGL power purchase agreement	—	2023-24 annual report: "expected to lower our operational carbon footprint (Scope 2 emissions) by approximately 70% by 2030". Climate report Appendix A: the agreement's lever is −10,500 t CO_2-e, about 20% of current Scope 2, with grid decarbonisation booked separately at −43,000.	Cannot verify: the two statements may measure different things (the agreement's own effect against total Scope 2 reduction by 2030), but the report does not reconcile them.

CLAIM / METRIC	TO THE REGULATOR	TO INVESTORS / PUBLIC	CONSISTENT AFTER NORMALISING BOUNDARY?
Credit project status	The Clean Energy Regulator is the registering authority; no registration evidence provided	Climate report body: the project "was registered" with the Clean Energy Regulator. Climate report Appendix A: Hunter Water "is currently working with the Clean Energy Regulator to register" the ACCUs.	No: contradictory within one document, on the instrument that delivers 26% of the 2035 endpoint.
Assurance status of the figures	No assurance statement exists	Page 5: three favourable external reviews of the disclosure described. Page 23, footnote: the figures "have not been independently verified by a third party".	Yes: technically consistent, the reviews being of the report rather than the figures, but the prominence is inverted, so the impression diverges from the position.
Onsite renewable generation series	Not a regulator metric	2021-22 annual report: "1.74 megawatts of solar … 1,685 megawatt hours". 2022-23: "capacity to 1.74 MW and generated 1,685MWhr", the same two figures a year later. 2023-24: "4.05GWh, a 25% increase year on year" and "capacity to 2.96MW" after "an additional 400kW". 2024-25: capacity only (6.4 MW), generation not disclosed.	No: an internally irreconcilable series, same metric, same report type, nothing to normalise. An increase of 141% is reported as 25%; 1.74 plus 0.40 does not equal 2.96; and one year's figures are repeated for the next.
Basis for excluding treatment-plant emissions from statutory reporting	Climate report: excluded because the **operational-control test** is not met, and Veolia reports them	2023-24 annual report: "other reporting frameworks, like NGER, categorise these emissions as **Scope 3**"	No: two incompatible mechanisms for one exclusion, and the earlier one is not correct on its face, the statutory scheme having no Scope 3 category, so no normalisation reconciles them. This sits directly beneath the review's headline positive.
Net character of the 2030 target	Climate report: "Both our 2035 target and our interim 2030 target are **net** targets, meaning they include the use of carbon offsets"; footnote: "4% of the 2030 target and 26% of the 2035 target will be met through ACCUs"	Audited annual report, three places, all **without** "net": the customer report card measure "% reduction in carbon dioxide equivalent emissions compared to a 2020-21 baseline"; "our goal to reduce our greenhouse gas emissions by 80% by 2030"; and the sustainability scorecard target column "80% reduction by 2030". **The words "ACCU", "carbon credit" and "carbon offset" appear nowhere in the annual report**	No: the same target is a net target in one document and an unqualified reduction target in the other. Same target, same period, same entity, and nothing to normalise. The **G** is awarded against the version that does not mention credits.

6. How to fix it

6.1 NoCO2 Standard alignment

FINDING	REVIEW FINDING (WHY IT MATTERS)	NOCO2 MECHANISM	DOCUMENT / CLAUSE	REQUIRED EVIDENCE	LIKELY NOCO2 OUTCOME
F-GOV-2 * (recast rev 2)*	~~One metric, three performance statuses (R / G / "N/A")~~ **Statuses published against targets a reader cannot see or cannot see graded consistently**: a red against an annual target quantified nowhere, a green on the 2030 target graded on a method that target is not set on, plus an "on track" claim in a year emissions rose	Public Disclosure Statement + claim controls + non-conformance disclosure	**4.9.1 Use of Claims and Statements; 4.9.4 Public Reporting & Disclosure; 5.1.11 Reduction Obligation Progress; 5.1.15 Non-Conformance Disclosure**	The annual target and the result against it; one method for grading the 2030 target across both documents; the annual pathway; year-on-year movement	Claim correction + non-conformance disclosure required
F-S2-1	~55% of the planned 2030 reduction is grid decarbonisation; attributed to onsite solar in the narrative	Reduction-obligation trajectory + contractual-instrument and methodology disclosure	**4.7 Reduction Obligations; 4.7.4 Accelerated Reduction Timeline; 4.5.5 Methodology (market vs location-based); 5.1.10 Emissions Tracking; 5.1.13 Contractual Instruments**	Consumption series, grid factors per period, decomposition into own action / factor / instruments / credits	Trajectory correction: business-as-usual movement cannot be credited as abatement
F-BASE-1	Base year stated as 2005 / 2020-21 / 2021-22, three values, two methods, no restatement note	Metrics & targets base-year consistency + emissions tracking	**4.9.2 Metrics & Targets; 4.3 Initial Year & Reporting Period; 5.1.10 Emissions Tracking; 5.1.11 Reduction Obligation Progress**	One base year with its value, method and boundary; a restatement bridge; the 2021-22 inventory	Restatement transparency non-conformance until reconciled

FINDING	REVIEW FINDING (WHY IT MATTERS)	NOCO2 MECHANISM	DOCUMENT / CLAUSE	REQUIRED EVIDENCE	LIKELY NOCO2 OUTCOME
F-INV-3	Scope 1 up 31% since baseline, **undecomposed** *(rev 2: "unexplained" withdrawn)*; now 26% of the footprint	Net Zero Inventory quantification + required interventions	**4.5.4 Quantification; 4.5.3 GHG Emission Categories; 4.7.1 Required Interventions**	Source-and-driver decomposition of the increase; the wastewater process-emissions abatement pathway	Required-intervention review on the growing high-GWP process sources
F-INV-4	Boundary election includes contractor-operated plants (~50% of the footprint) that NGER excludes	Organisational boundary	**4.4 Organisational Boundary; 4.5.1 Emission Scopes**	Maintained boundary statement; verification of contractor data	**Positive (above baseline)**: conformant boundary logic
F-S3-1	Scope 3 not quantified for any category in any period; no bounding estimate	Net Zero Inventory + data quality + Scope 3 improvement plan	**4.5 GHG Inventories; 4.5.3 GHG Emission Categories; 4.5.4 Quantification; 4.6.3 Financial Reconciliation Check; 5.1.14 Data Quality & Scope 3 Improvement**	Category-level screening estimate with a total (spend-based acceptable); exclusion list with reasons	Inventory non-conformance until quantified
F-S3-3	Scope 3 excluded by silence rather than reasoned exclusion	Boundary description + category materiality	**5.1.7 Boundary Description; 4.5.3 GHG Emission Categories**	Stated material/non-material categories with reasons; a dated delivery plan	Disclosure correction
F-S2-2	Measured location-based, targeted market-based, market-based unreported	Methodology (market vs location) + contractual instruments	**4.5.5 Methodology; 5.1.13 Contractual Instruments for Purchased Energy; 5.1.10 Emissions Tracking**	Market-based Scope 2 for baseline and current year alongside location-based	Cannot conform until both methods are reported
F-S2-4	"100% renewable" expressly includes the mandatory Renewable Power Percentage	Contractual-instrument disclosure + claim controls	**5.1.13 Contractual Instruments for Purchased Energy; 4.9.1 Use of Claims and Statements**	Mandatory-vs-voluntary certificate split; the voluntary increment stated separately	Claim qualification required
F-S2-5	Behind-the-meter solar 6.4 MW, self-consumed; effect unquantified	Required interventions + contractual instruments	**4.7.1 Required Interventions; 4.5.5 Methodology; 5.1.13 Contractual Instruments**	Annual generation, self-consumed vs exported split, tCO_2-e avoided, certificate treatment per system	**Positive (above baseline): qualified**
F-S2-6	Certificates received and recognised in the accounts; no register, volume or disposition disclosed	Contractual-instrument disclosure	**5.1.13 Contractual Instruments for Purchased Energy; 4.5.5 Methodology**	Certificate register: creation, ownership, transfer, surrender, beneficiary, period	Cannot conform until reconciled
F-S2-7	Grid-decarbonisation and renewable-contract levers may overlap on the same electricity	Methodology + emissions tracking	**4.5.5 Methodology (market vs location-based); 5.1.10 Emissions Tracking**	Lever-by-lever reconciliation on one method, showing each lever's electricity base	Evidence gap
F-OFF-1	Gross/net separated and credit shares quantified; no credits surrendered yet	Carbon credit reporting + abatement principles	**4.8.1 Abatement Principles; 5.1.12 Carbon Credit Reporting**	Continued gross/net separation carried into the target statement	Baseline expected: **not credited** (A-16)
F-OFF-2	ACCU registration stated two ways; 45,000 generated vs 15,000 available unreconciled	Carbon credit reporting + reversal	**4.8 Carbon Credits; 4.8.4 Credit Reversal; 5.1.12 Carbon Credit Reporting**	CER project record, issuance history, current holding, 45,000-to-15,000 reconciliation	Cannot conform: evidence gap on a material target component
F-OFF-3	No permanence basis, on plantings in a bushfire-prone setting the same report flags	Permanence risk mitigation + reversal	**4.8.3 Permanence Risk Mitigation; 4.8.4 Credit Reversal; 4.8.2 CDR Criteria**	Permanence period, reversal buffer, bushfire-exposure management, CDR eligibility	Non-conformance risk until permanence is addressed
F-OFF-4	Credit supply ~6,400/yr against ~20,500/yr required; the gap filled by an undecided project	Abatement principles + accelerated reduction timeline	**4.8.1 Abatement Principles; 4.7.4 Accelerated Reduction Timeline; 5.1.12 Carbon Credit Reporting**	Annual requirement vs supply; the Terreel project's method, area, yield and decision date	Conditional: credits must be confined to the residual gap after required abatement
F-OFF-5	Self-generated, self-surrendered credits from a grant-funded project on own land	Influence Based Inventory: Category C (insetting)	**4.5.6 Influence Based Inventory Categories; 4.5.6.3 Category C: Other Impacts, Benefits & Insetting; Annex B**	Additionality basis under the applicable method; treatment statement	Reclassification: disclosed as insetting / influence-based, not netted to net zero
F-T-2	2035 endpoint unfunded and conditional on customer willingness to pay	Net zero status requirements + reduction obligations	**4.7.5 Net Zero Status Requirements; 4.7.5.1 Net Zero Committed; 4.7 Reduction Obligations; 4.9.2 Metrics & Targets**	Funded-vs-contingent split; willingness-to-pay test timing and consequence; fallbacks	"Net Zero Committed" conditions not met while the endpoint is contingent

FINDING	REVIEW FINDING (WHY IT MATTERS)	NOCO2 MECHANISM	DOCUMENT / CLAUSE	REQUIRED EVIDENCE	LIKELY NOCO2 OUTCOME
F-T-3	Gross emissions rise 2030→2035 (76% → 74%); growth adds ~15,500 t	Accelerated Reduction Timeline + emissions tracking	**4.7.4 Accelerated Reduction Timeline; 5.1.10 Emissions Tracking; 5.1.11 Reduction Obligation Progress**	Annual gross trajectory; growth-adjusted abatement requirement	Trajectory non-conformance: a rising gross path is not an aligned path
F-T-4	Capacity and maturity metrics rated on-track while the emissions row is "N/A"	Metrics & targets	**4.9.2 Metrics & Targets; 5.1.11 Reduction Obligation Progress**	Emissions effect of installed capacity in tCO_2-e; process metrics labelled as such	Metric correction
F-T-5	Endpoint deferred 2030 → 2035 and narrowed; not disclosed currently	Metrics & targets + emissions tracking	**4.9.2 Metrics & Targets; 5.1.10 Emissions Tracking; 5.1.15 Non-Conformance Disclosure**	Disclosure of the revision and its reason in the target section	Disclosure correction
F-T-6	"Paris-aligned" / "science-based" on a Scope 1+2-only, credit-dependent, unvalidated target	Use of claims without a claim + metrics & targets	**4.9.1.3 Use without a Claim ("informed by"); 4.9.1 Use of Claims and Statements; 4.9.2 Metrics & Targets**	The methodology, boundary and pathway substantiating alignment	Claim qualification: the halo exceeds the mechanics
F-T-7	Transition plan real but dependency-dominated; majority lever external	Reduction obligations + clean alternative assessment	**4.7 Reduction Obligations; 4.7.1 Required Interventions; 4.7.2 Clean Alternative Assessment; 4.7.4 Accelerated Reduction Timeline**	Quantified dependencies and delay sensitivity; fallbacks; the wastewater pathway; the Roadmap itself	Conditional: needs a disclosed annual trajectory
F-GOV-1	No assurance over any figure, beside three favourable reviews of the report	Assurance requirements + independent assurance statement	**6.1 Assurance Requirements; 6.2 Conformance Requirements; 5.1.4 Independent Assurance Statement**	Independent assurance over Scope 1 and 2 including contractor data; scope and level stated beside the figures	Assurance-readiness gap: conformance not available without assurance
F-GOV-3	~50% of the footprint from an unverified contractor report	Data quality + supplier-specific emission factors	**4.6 Data Quality; 4.6.1 Ranking; 4.6.4 SSEF Assessment; 5.1.14 Data Quality & Scope 3 Improvement**	Facility-level contractor figures; the verification performed; an SSEF declaration from the operator	Data-quality improvement obligation
F-GOV-4	Governance architecture complete and coherent	Governance & decision making	**4.9 Governance & Decision Making; 4.9.3 Roles & Responsibilities**	Maintained; add a pre-publication metric-reconciliation control	No apparent issue: **baseline, not credited**
F-AP-1	Mandatory TPG24-33 first year; not a Ch 2M entity; strictest framework claim made	Use of claims + reporting period	**4.9.1 Use of Claims and Statements; 4.3 Initial Year & Reporting Period; 4.3.1 Applicable Version**	Continued framework-claim accuracy as TPG guidance matures	No apparent issue on the claim's basis
F-AP-2	Net target without an associated gross target; no permanence disclosure	Reduction obligations + carbon credits	**4.7 Reduction Obligations; 4.7.4 Accelerated Reduction Timeline; 4.8.3 Permanence Risk Mitigation; 5.1.12 Carbon Credit Reporting**	A gross Scope 1+2 target; permanence, reversal and buffer basis	Non-conformance risk on both limbs
F-AP-3	No material financial impact asserted, unquantified and unreconciled to the capital programme	Public reporting & disclosure	**4.9.4 Public Reporting & Disclosure; 5.1 Public Disclosure Statement**	Quantified exposure by asset class; reconciliation to the adaptation programme	Evidence gap
F-AP-4	Audited perimeter does not reach the emissions figures or statuses	Assurance + public disclosure	**6.1 Assurance Requirements; 5.1 Public Disclosure Statement**	Clear marking of the audited perimeter where the figures appear	Disclosure correction
F-INV-1	Method named per source; factor values undisclosed; no Basis of Preparation	Methodology + quantification	**4.5.5 Methodology; 4.5.4 Quantification; 5.1.8 GHG Inventory Table**	Factor values per source per period; the Basis of Preparation	Disclosure improvement
F-INV-5	Comparability limited by a wider-than-statutory boundary, method mismatch, no intensity metric	GHG inventory table + boundary description	**5.1.8 GHG Inventory Table; 5.1.7 Boundary Description; 4.4 Organisational Boundary**	Statutory-boundary subtotal alongside the wider figure; an intensity metric	Disclosure improvement
F-NAT-1	Physical-risk coverage relevant and specific; qualitative only	Governance & public disclosure	standard review item: no direct clause (physical-risk disclosure sits in the reporting framework, not the NoCO2 Standard)	Quantified exposure by asset class linked to resilience capex	Not applicable to NoCO2 conformance

FINDING	REVIEW FINDING (WHY IT MATTERS)	NOCO2 MECHANISM	DOCUMENT / CLAUSE	REQUIRED EVIDENCE	LIKELY NOCO2 OUTCOME
F-NAT-2	Single RCP 8.5 scenario; transition risks untested against a low-emissions pathway	Metrics & targets (target-setting basis)	**4.9.2 Metrics & Targets**; otherwise standard review item: no direct clause	A low-emissions / orderly-transition scenario	Not applicable to NoCO2 conformance; informs target integrity
F-NAT-3	Storage headroom reduced ~18% (dam safety) not referenced in the climate report	Public reporting & disclosure	**4.9.4 Public Reporting & Disclosure**	Reference in the water-security risk assessment, with the driver distinguished	Disclosure improvement
F-NAT-4	No nature or biodiversity disclosure beyond opportunity framing	Influence Based Inventory (Category C)	**4.5.6.3 Category C: Other Impacts, Benefits & Insetting**	A nature and water-quality materiality screen	Forward gap
F-GOV-5	No climate-linked remuneration disclosed	Metrics & targets	**4.9.2 Metrics & Targets**	If later linked: metric boundary, gross/net basis, assurance status	Not applicable
F-S2-8 *(new rev 2)*	Onsite-generation series does not reconcile across three annual reports	Emissions tracking + metrics & targets	**5.1.10 Emissions Tracking; 4.9.2 Metrics & Targets; 5.1.8 GHG Inventory Table**	Restated capacity and generation series on one basis for every period; the 2024-25 generation figure with the self-consumed / exported split	Tracking non-conformance until the series is restated
F-T-8 *(new rev 2)*	Belmont booked at net +3,000 t against its own 100%-renewable planning condition	Methodology + reduction obligations	**4.5.5 Methodology (market vs location-based); 4.7 Reduction Obligations; 5.1.10 Emissions Tracking**	Reconciliation of the +6,500 / −3,500 pair to the planning condition on one stated method; one first-water date	Trajectory evidence gap
F-INV-6 * (new rev 2)*	Narrative Scope 1 source list omits the natural-gas boiler its own Table 5 discloses	Boundary description + quantification	**5.1.7 Boundary Description; 4.5.3 GHG Emission Categories; 4.5.4 Quantification**	A complete source list matching the methodology table; the boiler's fuel volume	Disclosure correction
F-SEC-1	General sector; no specialised module	—	standard review item: no direct clause	—	Not applicable

7. Conclusion & next steps

Hunter Water's inaugural climate disclosure does several things well and one thing badly enough to govern the result. It counts, and takes target responsibility for, roughly half a footprint the law would let it leave with its contractor: a boundary decision taken against its own interest and the most substantive element in the report. Its physical-risk work is developed: an asset-level vulnerability assessment completed, regional projections in the supply models, and the concentration risk stated plainly. Its roadmap discloses its own composition, so a reader can see how little of the pathway the entity controls. The 2030 pathway is **funded** inside the price determination and recovered through customer charges, and an external committee of about 50 members constituted in June 2025 will recommend the performance rating on a customer report card that contains the emissions target.

But the report a reader meets first does not carry that candour. The red status is published against an annual target the reporting suite never quantifies, and the green 22 pages later grades the 80%-by-2030 target on a location-based number that the same page's footnote says is not that target's basis, which is exactly why the climate report records the same assessment as not yet available. The annual report says the company is on track in a year emissions **rose 1.8%**, and that increase is stated nowhere. The reduction is attributed to onsite solar in the very year solar capacity roughly doubled and Scope 2 moved by seventeen tonnes, while the company's own roadmap names grid decarbonisation as the primary driver and puts about **55% of the planned 2030 reduction** down to it. Scope 1, now a quarter of the footprint, has risen **31%**, and on the entity's own source mapping the fastest-growing part is its own liquid-fuel and gas combustion, which the roadmap addresses with one uncosted, undated line. The base year has been stated as 2005, 2020-21 and 2021-22 across the suite, and the endpoint moved from 2030 to 2035 without reconciliation. The onsite-generation series repeats a year, reports an increase of 141% as 25%, and does not add up on capacity. The roadmap books a permanent net emissions increase for a plant the same document says will run entirely on renewable electricity. And the 2030 target is a *net* target in the climate report, 4% of it delivered by tree-planting credits and 26% at 2035, while the audited annual report states it three times as a plain "80% reduction" with the words "ACCU", "carbon credit" and "carbon offset" appearing nowhere in that document at all, so the green status is awarded against the version without the credits in it.

The result is uneven. For the carbon accountant the footprint cannot be lifted, because the value chain is absent, there is no single reconcilable baseline and nothing is assured. For the institutional investor the reduction is largely not the company's own, the 2035 endpoint is neither funded nor decided, and the reconstruction that would test either is unavailable. For the retail investor and the public neither published status can be tested against a target they can see, and the target they are shown is not the target the entity has set. For the regulator this is a mandatory first year substantially delivered, held back by consistency rather than coverage.

The single most valuable fix costs nothing to compute: publish the annual emissions target the red status is measured against, grade the 80%-by-2030 target on one stated method in both documents, and publish the electricity consumption and grid emission factors that let a reader separate Hunter Water's own abatement from the grid's. From there: explain the Scope 1 increase by source and driver; report market-based Scope 2 as the targets require; set a gross target beside the net one; settle the base year at one value and method; state "net" and the credit share wherever the target appears; disclose the credit permanence and supply position and correct the registration statement; split the mandatory renewable share out of the "100% renewable" target; obtain assurance over the figures; and put a screening estimate on Scope 3. CRI's Carbon Inventories, Decarbonisation Strategies, Mandatory Climate Reporting, Supplier-Specific Emissions Factors and Assurance services, and the NoCO2 Net Zero pathway, map directly onto that work.

Important information

This diagnosis is general information, published to support transparency, accountability and public debate on corporate climate disclosure. It sets out CRI's assessment of the publicly available climate disclosures of the organisation named above, for the reporting period stated, based on third-party information available at the review date. The assessment is made against CRI's Climate Disclosure Review Rules (version stated above), which use the CRI Net Zero Standard as the reference for a credible claim together with AASB S2 Climate-related Disclosures, and it gives reasons for each finding.

It assesses the disclosure, not the organisation's underlying climate performance or intent, and it does not allege illegality, misconduct, greenwashing or dishonesty. It is not tailored advice, nor legal, financial or investment advice, and it is not an audit, an assurance engagement or a certification. CRI does not accept liability for any error or omission in this analysis, or for any loss arising from use of or reliance on it.

AI tools help locate, extract and organise material from the source documents against a fixed rule set. Every rating and conclusion is reviewed and confirmed by CRI analysts; the rules, not the model, determine the outcome.

Organisations may contact CRI at robc@noco2.com.au to identify an error, provide relevant public information or request review of updated disclosures. Where a correction affects a finding, the diagnosis is updated and the change is noted. Further information about the review method is at noco2.com.au.

© Carbon Reduction Institute Pty Ltd, ABN 26 122 969 233. This report is protected by copyright. It reproduces third-party material for the purpose of criticism and review; any reproduction of this report not permitted under the Copyright Act 1968 (Cth) requires CRI's consent.

--- ANNEXES (INTERNAL WORKING LAYER) ---

These annexes are the detailed working layer behind the findings in the body: the evidence base, rule application and traceability. Much of it is review working, retained for transparency and of interest to both the internal review team and external readers who want to see how each finding was reached.

Annex A: Documents reviewed & completeness (A-01A)

DOCUMENT	STATUS	CRITICALITY	NOTES
Climate-related Financial Disclosures 2025 (`Hunter-Water-CRFD-2024-25.pdf`)	Reviewed	Critical	Primary climate document. Governance p7–9; Strategy p11–18; Risk p20–21; Metrics & targets p23–27; Appendix A roadmap p29–30; Appendix B requirements index p31–35
`Hunter Water Climate-related financial disclosure 2024-25.pdf`	Reviewed	—	Different MD5, **text-identical** to the above (verified by diff). Treated as one document; no double-counting
Annual Report 2024-25 (`Annual-report-2024-25(1).pdf`)	Reviewed	Critical	Primary audited source (A-01B). Corporate scorecard p34; climate narrative p34; sustainability scorecard p56; risk p45–46; audited financial statements p77+ (Audit Office of NSW)
Annual Report 2023-24	Reviewed	Material	Longitudinal context. Baseline 2020-21 81,025 and grid decarbonisation named as a driver **p41** *(rev 2: previously cited p42, citation slip, verified)*; Scope 1 17,270 / Scope 2 52,033 (**p43**); PPA "~70% by 2030" p15; "building out Scope 3 emissions data" p42. **p43 also states NGER "categorise these emissions as Scope 3": incompatible with the CRFD's operational-control account (rev 2, F-21). p40: "4.05GWh, a 25% increase year on year", "an additional 400kW", "capacity to 2.96MW": series does not reconcile (rev 2, F-20)**
Annual Report 2022-23	Reviewed	Material	**Baseline stated as 2005, 82,097 tCO_2-e**; targets "compared to 2005 levels" p44, p47; Scope 1 16,395 / Scope 2 56,378. **p44: "capacity to 1.74 MW and generated 1,685MWhr": identical to the figures AR2021-22 gave for the prior year (rev 2)**
Annual Report 2021-22	Reviewed	Material	Target endpoint changes to 2035 (**pp.6, 10, 16, 21**: *rev 2: previously cited "p8, p21"; p8 carries no target statement*). ~~**Contains no emissions figures at all**: no tCO_2-e value anywhere in the document~~ **[WITHDRAWN, source-fidelity review: p16 states "Our operations emit around 80,000 tonnes of carbon dioxide a year, which is equivalent to almost 18,000 passenger vehicles being driven for a year." The correct statement is that it discloses a single whole-of-operations approximation and** no Scope 1, Scope 2, boundary or method**: no inventory.] Also newly recorded: p16 sets the interim target as "an 80 per cent net reduction by 2030 compared to** 2005 **levels", so the 2005 base was in force one period earlier than F-BASE-1 recorded. p6: "already installed 1.74 megawatts of solar... generated 1,685 megawatt hours".**
Annual Report 2020-21	Reviewed	Material	"our goal to have **net zero emissions by 2030**"; onsite solar rollout; 12% grid-electricity reduction estimate
Annual Report 2019-20	Reviewed	Material	"aspirational goal... **to be carbon neutral by 2030**" (**PDF pp.13 and 23**: *rev 2: previously cited p14, p33; corrected on re-extraction*); indirect emissions ≈70% / direct ≈30% of footprint
NGER register FY2024-25 (`reference/ngers-register-2024-25.csv` , as at 27/02/2026)	Reviewed	Material	**No match for Hunter Water**: not a controlling corporation for the period. Veolia Holdings Australia matched (group-wide, not attributable)
Basis of Preparation document	Not provided	Critical	Referenced at CRFD p5. Method, factors, boundary treatment and the basis for the base-year change cannot be verified
Net Zero Roadmap	Not provided	Critical	Only the Appendix A summary chart and assumption list available; lever costings, sensitivities and the annual trajectory cannot be verified
Climate Change Adaptation Plan	Not provided	Material	Priority areas described narratively; actions, milestones and costings unverifiable. Scheduled for review next period

DOCUMENT	STATUS	CRITICALITY	NOTES
Assurance statement over GHG figures	**Does not exist**	Critical	CRFD p23 fn 6: figures "have not been independently verified by a third party". Internal audit was planned for December 2025
Veolia emissions report	Not provided	Critical	Source of ~65% of Scope 1 and ~45% of Scope 2. No verification of the contractor's figures is described
Certificate / LGC register; ACCU issuance & retirement records	Not provided	Critical	The renewable-electricity and carbon-credit legs of the target cannot be reconciled
Electricity consumption (MWh); grid emission factors applied	**Not disclosed in any period**	Critical	Without these the reported reduction cannot be decomposed into own action vs grid decarbonisation
Market-based Scope 2, any period	**Not reported**	Critical	The basis on which targets are set and will be tracked; reporting begins 2025-26
Quantified Scope 3 inventory / category table	Not provided	Material	Never quantified in any period; no bounding estimate for any category
Sustainability Strategy (approved June 2024); Corporate Strategy (Miromaliko Baato)	Not provided	Useful	Described in the CRFD; objectives and 2030 measures summarised there
Board / Committee charters	Not provided	Useful	Referenced as available on the website; updated 1 July 2025 (after the period)
IPART 2025-30 price determination; 2025-26 Business Plan	Not provided	Material	Cited as the funding source for the 2030 pathway; the funded-vs-contingent split cannot be verified

Annex B: Evidence table (AI-02)

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
E1	CRFD p23; Table 3 p25	Scope 1 18,516 (HW 6,492 + Veolia 12,024); Scope 2 LB 52,016 (HW 28,655 + Veolia 23,361); total 70,532; base 2020-21 81,026; −13%. All components sum correctly	F-INV-1, F-INV-2	G-06, S2-25, S2-26, S2-27	Reconciled (arithmetic verified)
E1a	Table 3 p25 (reviewer calculation)	FY24 69,303 → FY25 70,532 = **+1.77%**; Scope 1 +7.2% (HW sites +17.3%); Scope 2 −17 t (−0.03%). Not stated in any document	F-INV-3, F-S2-1	A-19, S2-41, OUT-TB-07	Reconciled (derived; labelled as reviewer calculation)
E2	CRFD p23–24; Table 3	**Scope 1 up 31%** since baseline (14,135 → 18,516); ~~no explanation anywhere~~ **[rev 2: a generic "population growth" driver is disclosed for the *projected* growth bar (Appendix A p29, p30); no source-and-driver decomposition of the realised rise appears in any document]**; SF_6 recorded nil ("no changes in stock", Table 5 fn v)	F-INV-3	G-06, S2-25, G-12, S2-05	Issue identified: **undecomposed** material trend
E3	CRFD p23	Boundary: NGER operational-control test **excludes** the Veolia-operated treatment plants (reported by Veolia); "for the purposes of this climate-related disclosure and for tracking progress against our targets, it is appropriate to include" them. HW retains ownership and accountability	F-INV-4 (positive), F-GOV-3	G-04, G-05, GHG-STD-01, GHG-STD-07, A-16	**Positive (above baseline)**; underlying data cannot-verify

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
E3a	CRFD Table 5 p27–28; reviewer calculation	Veolia-sourced: wastewater CH_4/N_2O (Scope 1) and plant electricity (Scope 2) = 12,024 + 23,361 = 35,385 t ≈ **50% of the footprint**; HW-only NGER-boundary Scope 1+2 = 6,492 + 28,655 = **35,147 t** (below the 50 kt threshold)	F-GOV-3, O.2	A-01C, G-04, GOV-12	Reconciled (boundary); contractor data cannot-verify
E4	CRFD p23 fn 6	"These figures are based on internal calculations and **have not been independently verified by a third party**"	F-GOV-1	L-08, GOV-12, OUT-TB-04, E-22	Issue identified: no assurance
E5	CRFD p5 "Quality and integrity"	Three external reviews described: specialist-consultancy systems assessment; DCCEEW-coordinated review giving "positive feedback on the fairness and connectivity of our disclosures"; legal advisory firm "concluding our 2024-25 CRFD is well prepared and comprehensive". Internal audit "planned for December 2025". None named; none published; none is assurance over figures	F-GOV-1	OUT-TB-04, OUT-RRB-05, OUT-EXT-07, A-05	Issue identified: assurance-halo; conclusions cannot-verify
E6	AR2025 **p34** (strategic-objective sub-measure table)	"Measure: Progress of strategic objectives / Major environmental incidents / Swimability – Beachwatch / **Greenhouse gas emissions**" → "Status: R G G **R**". Legend: "Red means the target has not been met". **Rev 2, verified by raw *and* layout re-extraction: the table has only Measure and Status columns, no Target column, and no target value appears anywhere on the page.**	F-GOV-2	AI-07, DR-02, S2-41, OUT-TB-02	**Recast rev 2: the red is against an *annual* target that is not stated here or anywhere in the suite**
E6-a2 **(new, rev 2)**	AR2025 **p16** (Corporate Scorecard, Actual/Target/Status)	The master Corporate Scorecard lists Customer experience, Community trust, Customer and environment service index, Leakage, Progress of strategic objectives, TRIFR, Safety interactions, EBITDA and Cost Efficiency Program: with Actual and Target values for each. **Greenhouse gas emissions is not a row in it.** The p34 status is a sub-measure of the composite "Progress of strategic objectives" (73% actual vs 80% target, R)	F-GOV-2	AI-07, S2-41, OUT-TB-02, GOV-12	**Issue identified: the annual emissions target is quantified nowhere in the annual report**
E6-a3 **(new, rev 2)**	AR2025 **p34** narrative, sentence immediately beneath the status table	"Greenhouse gas emissions data shows a reduction in annual Scope 1 and 2 emissions levels, from 81,026 tonnes… to 70,532 in 2024-25 (location-based method). This represents a 13% reduction in emissions. **While short of our annual target, we are on track to meet our 2030 commitment. More detail can be found on page 56**"	F-GOV-2, C3	OUT-STK-05, OUT-TB-03, AI-07	**Defeats the "no resolution offered" limb of the original F-GOV-2: the correction is co-located and cross-referenced**
E6a	AR2025 **p56** (sustainability scorecard)	Target column states **"80% reduction by 2030[3,4]"**, result 70,532 tCO_2-e, baseline 81,026 "Location-based method[2]" → Status **G**. **Footnote 3: "Target is based on the market-based greenhouse gas emissions calculation methodology. Emissions will be monitored and reported using the market-based method from 2025-26." Footnote 2: progress "reported using the location-based approach".**	F-GOV-2	AI-07, DR-02, S2-41, E-01	~~direct contradiction with E6~~ **Recast rev 2: E6 and E6a are against different targets. The issue is that the G grades a market-based target on a location-based result, which is the same reason E6b records "N/A"**

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
E6b	CRFD Table 4 p26	Reporting-period performance 2024-25 = **"-13%"**; "Performance against target" for operational GHG emissions = **"N/A"**[iii]; footnote iii: progress reported location-based against location-based baselines, market-based baselines "will be disclosed in the next reporting cycle"	F-GOV-2, F-S2-2	AI-07, DR-02, S2-41, E-01, G-10	~~third status for the same metric~~ **Recast rev 2: a footnoted statement of non-assessability with a stated reason, not a contradictory status. It is nonetheless incompatible with the AR p56 "G" on the same target**
E6c	AR2025 p34 narrative	"This represents a 13% reduction in emissions. While short of our annual target, **we are on track to meet our 2030 commitment**"	F-GOV-2	S2-41, A-19, OUT-TB-02, OUT-TB-07	Issue identified: on-track claim in a year emissions rose
E7	CRFD p25 "Our performance"	"Location-based operational GHG emissions in 2024-25 decreased by 13%... This reduction was **driven by increased onsite solar generation, consumed directly on site (behind the meter)**"	F-S2-1	A-19, G-BAU, OUT-TB-07, E-01, T-MI-06	Issue identified: attribution not supported
E7a	CRFD Appendix A p29, "Emissions reduction and removal" note (2020-21 → 2029-30, market-based)	**Quotation corrected rev 2: full sentence:** "Reduction within this period **primarily results from grid decarbonisation**, **the roll out of Hunter Water Phase 1 and 2 Onsite Renewable Energy Program**, the AGL renewable PPA for large sites and the Belmont Desalination Plant and energy efficiency and process optimisation initiatives." *(The earlier ellipsis removed the onsite renewable programme, the very driver E7 credits.)*	F-S2-1	A-19, G-BAU, AI-07	~~contradicts E7 within one document~~ **Recast rev 2: E7 names only the second of five drivers and omits the primary one; different period (to 2029-30) and different method (market-based) from E7**
E7b	AR2024 **p41** *(rev 2: previously cited p42, citation slip)*	"Progress is driven by Hunter Water's investment in energy efficiency, the Renewable Energy Program and **the decarbonisation of the NSW electricity grid**"	F-S2-1, YOY	YOY-05, SEC-SF-11, A-19	Issue identified: grid attribution present FY24, dropped FY25
E7c **(new, rev 2)**	AR2024 **p43** vs CRFD **p23**	AR2024: "Hunter Water classifies emissions from wastewater treatment as Scope 1. However, other reporting frameworks, like NGER, categorise these emissions as **Scope 3**." CRFD: the plants are excluded from NGER because "Hunter Water's emissions boundary is defined strictly in accordance with the NGER Act's **operational control test**... and instead reported by Veolia". NGER has no Scope 3 category	F-INV-4, F-GOV-3, O.1	DR-02, AI-07, YOY-05, G-04	**Issue identified: two incompatible mechanisms for one exclusion; the earlier account is wrong on its face**
E7d **(new, rev 2)**	CRFD p29 Figure 1A vs CRFD p15 and p30	Figure 1A books "Belmont Desalination Plant **+6,500**" growth and "Belmont Desalination Plant – renewable energy supply **−3,500**" → residual **+3,000 t**. p15: "The plant is required to operate on 100% renewable electricity." p30 assumption: "assumed to be powered by 100% renewable energy per the NSW State Planning condition of consent, from commissioning and proving phases, through to operation"	F-T-3, F-S2-7, F-S2-3	AI-07, E-06, T-09, S2-42, A-05	**Issue identified: a permanent net Scope 2 increase booked for a fully-renewable asset, unexplained**

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
E7e **(new, rev 2)**	AR2022 p6 · AR2023 p44 · AR2024 p40	AR2022 (for 2021-22): "already installed 1.74 megawatts of solar… we generated 1,685 megawatt hours". AR2023 (for 2022-23): "Expanded our total renewable energy generation capacity to **1.74 MW** and generated **1,685MWhr**": identical. AR2024 (for 2023-24): "Increased total onsite electricity generation to **4.05GWh, a 25% increase year on year**"; "Commissioned an additional **400kW**"; "capacity to **2.96MW**". Reviewer arithmetic: 4,054 / 1,685 = **+141%**; a 25% rise implies an undisclosed prior year of ≈3,243 MWh; 1.74 + 0.40 = 2.14 ≠ 2.96	F-S2-5, P.1	YOY-02, YOY-04, AI-07, A-19	**Issue identified: the own-action evidence series does not reconcile across three periods**
E8	CRFD Appendix A Figure 1A p29 (transcribed & reconciled)	Baseline 79,000 (2020-21, **market-based**); growth +9,000 portfolio, +6,500 Belmont; grid decarbonisation **−43,000**; AGL renewable contract −10,500; Belmont renewable supply −3,500; onsite renewables + energy efficiency −18,000; tree planting −3,000	F-S2-1, F-T-1, F-T-3	A-19, G-BAU, T-07, T-11, S2-15	Reconciled to the narrative percentages (fidelity §2); **extraction caveat (image-chart)**
E8a	Reviewer calculation from E8	Share of the 78,000 t total 2030 reduction effort: grid decarbonisation **55%**; own action (onsite + efficiency) **23%**; renewable contracts **18%**; credits **4%**. Gross reduction (79,000 − 19,500)/79,000 = 75.3% ≈ the stated 76%	F-S2-1	A-19, G-BAU, T-07	Reconciled (derived; reconciles to disclosed 76%)
E9	CRFD p24; Table 4 fn ii, fn 8	Both targets are **net**; projected gross reduction **76% by 2030 and 74% by 2035**; "projected 2% increase in gross emissions from 2030 to 2035" due to population growth; **4% of the 2030 target and 26% of the 2035 target** met through ACCUs. "Hunter Water does not have a formal gross GHG emission reduction target"	F-T-1, F-OFF-1, F-AP-2	S2-40, T-10, G-11, E-08, E-20	Reconciled (transparent); **gross target absent**
E10	CRFD p24; p16 fn 3; Appendix A p30; AR2025 p56 fn 4	Net zero Scope 1+2 by 2035 and 80% net by 2030, both "**subject to confirmation of customer willingness to pay**". 2030 funded in the IPART 2025-30 determination; 2035 requires "further emissions reduction investment decisions… in our Price Path 2030 (PP30)… pending customer willingness to pay"	F-T-2	T-06, T-11, S2-15, T-DEP-04, S2-42	Issue identified: endpoint unfunded and conditional
E11	CRFD p24	"In 2013, Hunter Water received funding through a Commonwealth grant… for a tree planting project. **The project was registered** with the Clean Energy Regulator under the ACCU scheme… Located at Chichester and around Grahamstown Dam… expected to contribute carbon offsets equivalent to 4% of our 80% GHG emissions reduction target by 2030"	F-OFF-2	E-08, E-09, E-10, E-19, E-20	Open
E11a	CRFD Appendix A p30	"Hunter Water **is currently working with** the Clean Energy Regulator **to register ACCUs** generated from the… Project which commenced in 2013. A third-party audit… January 2025… concluded that during the reporting period from 1 July 2017 to 30 June 2024, approximately **45,000 ACCUs were generated**"	F-OFF-2	AI-07, E-08, A-05	**Issue identified: contradicts E11 on registration status**
E11b	CRFD Appendix A p29	"up to **15,000 ACCUs** or 15,000 tCO2e are **currently available**"; "Ongoing annual surrendering of ACCUs will likely be required to maintain net emissions reduction levels **from 2029-30 onwards**"; Terreel tree planting shown as −15,000 (future decision)	F-OFF-2, F-OFF-3	E-08, E-19, A-05, T-11	**Cannot verify: 45,000 vs 15,000 unreconciled; supply short of requirement**
E11c	CRFD Table 1 p13; p12; E11	Report identifies bushfire as a material physical risk to "assets located in bushfire-prone zones"; the plantings are at Chichester and around Grahamstown Dam. **No permanence, reversal or carbon-maintenance disclosure anywhere in the document**	F-OFF-3	E-10, A-05, DR-05, N-01	Cannot verify: permanence basis absent

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
E12	CRFD p24, Table 4 fn ii/iii; p24 fn 7; AR2025 p56 fn 2/3	"The market-based calculation approach for Scope 2 emissions was used in Hunter Water's target setting and will also be used for progress tracking. Hunter Water will begin reporting market-based electricity emissions in FY2025-26"; performance for 2024-25 reported location-based	F-S2-2	E-01, S2-28, G-10, T-MI-06, GHG-STD-08	Issue identified: measured on one method, targeted on another
E13	CRFD p25; AR2025 p34; AR2024 p15	AGL PPA commenced 1 January 2025 (half the reporting period); "will progressively transition electricity supply for large sites to 100% renewable energy by 2030". AR2024: PPA "expected to lower our operational carbon footprint (Scope 2 emissions) by approximately 70% by 2030"	F-S2-3	E-24, E-14, E-23, DR-02, AI-07	Cannot verify: PPA effect sized inconsistently across periods
E14	CRFD Appendix A p30 (assumptions)	"The AGL renewable Power Purchase Agreement will start with a proportion of 20% and scale up to 100% of LGCs for all large-scale asset consumption by 2030, **inclusive of mandatory obligations under Australian Government DCCEEW Large-Scale Renewable Energy Target (Renewable Power Percentage)**"	F-S2-4	E-07, E-09, E-11, E-21, E-24, S2-42	**Issue identified: mandatory renewable share counted inside a voluntary 100% target**
E15	CRFD p25; AR2025 p34; AR2024 **p40**; AR2023 **p44** * (rev 3: previously cited AR2024 p42 and AR2023 p46, citation slips, verified on re-extraction; E7e had the correct pages)*	Onsite solar: Phase 1 complete **6.4 MW**; Balickera Solar Farm 3.1 MW commissioned late 2024, "doubles our total onsite solar capacity to more than 6 megawatts"; Phase 2 contracted 8.3 MW (Cessnock, Shortland). Prior generation: 1.74 MW / 1,685 MWh (FY22); 2.96 MW / 4,054 MWh (FY24, "80% self-consumed onsite, remainder exported"). **FY25 generation not disclosed**	F-S2-5 (positive, qualified)	E-16, E-03, E-15, T-01, A-16, S2-14	**Positive (above baseline): qualified**; generation & certificate treatment cannot-verify
E16	CRFD p25; Table 4 p26	Target: "absolute installed renewable energy capacity of **13 MW by 2030**", performance 6.4 MW, "On track". Climate-risk maturity target "Embedded (level 4) by 2030", current "Systematic (level 3)", "On track", **self-assessed** with third-party input that "is not a fully independent process". **Rev 2 correction: Table 4 has FOUR target lines, THREE "On track". The omitted line: "100% renewable energy electricity supply for our large sites (PPA)[iv]": Reporting period performance 2024-25** "N/A**", Performance against target** "On track**", footnote v: "tracking progress towards our renewable energy target from contractual instruments** will begin in the next reporting period"	F-T-4	T-PROC-05, T-01, A-16, AI-07	Issue identified: process/input metrics as performance, **and a status asserted for a target the document says is not yet tracked**
E17	AR2025 **p107, Note 20 "Statement of Cash Flows – operating activities"** * (rev 2: previously cited "p100+")*	"Renewable energy certificates received" recognised as a non-cash reconciliation line in both years. ~~**Quantum not recoverable from the text layer**~~ **[WITHDRAWN, source-fidelity review: the quantum is** $(59)k for 2025 and $(201)k for 2024**. Eight labels precede "Change in operating assets and liabilities:" and eight paired values are printed; the mapping is anchored by "Net profit for the year from operations 19,406" and "Depreciation and amortisation 107,778", both matching the audited income statement (E30). Confirmed by raw and by targeted** `-layout` **re-extraction of page 107.]** No register, **volume** or disposition disclosed anywhere. **The recognised value fell 71% year on year in the year onsite capacity roughly doubled**	F-S2-6	E-02, E-03, E-15, E-16, A-05	**Recast rev 2: the dollar amount is recoverable and now stated; the volume, register and disposition remain cannot-verify**

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
E18	CRFD Figure 2 p17; AR2024 p42; whole suite	Scope 3: a "**Scope 3 Emissions Roadmap**" box: "Build understanding of the largest Scope 3 emission sources and identify emissions reduction opportunities": with **no figure**. AR2024 listed "building out Scope 3 emissions data"; not delivered. **No Scope 3 quantified in any period; no bounding estimate for any category.** TPG24-33 MT1 requires Scope 1 and 2 only	F-S3-1	S2-29, S2-30, G-08, G-15, S3-01, S3-02, S3A-01, S3A-02, OUT-STK-13	Material evidence missing: **caps carbon-accounting audience at 1**
E19	AR2023 p44, p47	Baseline "**82,097 tCO2e (2005)**"; targets "net zero operational emissions (scope 1 and 2) by 2035, and 80% reduction by 2030 **compared to 2005 levels**"; progress "72,772 tCO2e (June 2023) which is a 11% reduction compared to 2005 levels"	F-BASE-1	G-10, T-BASE-01, YOY-04, S2-39	**Issue identified: base year later moved without restatement**
E19a	CRFD Table 3 p25 vs Table 4 p26 vs Appendix A p29	Table 3 base year **2020-21 (81,026)**; Table 4 base period **2021-22**; Appendix A 2020-21 baseline **79,000 (market-based)**. AR2024 **p41** *(rev 3: previously cited p42)*: **81,025**; AR2025 p56: **81,026**	F-BASE-1	T-BASE-01, G-10, S2-39, AI-07, YOY-04	**Issue identified: three base periods, three values, two methods**
E20	AR2020 **PDF pp.13 and 23** *(rev 3: previously cited p14, p33, citation slips; Annex A was corrected at rev 2 and this cell was not)*	"Hunter Water has also set four aspirational goals: **to be carbon neutral by 2030**"; "we aspire to become carbon neutral by 2030"; indirect ≈70% / direct ≈30% of footprint	F-T-5	YOY-06, YOY-08, S2-41, A-18, T-05	Context (prior period): target endpoint later moved
E20a	AR2021 p29	"consistent with our goal to have **net zero emissions by 2030**"	F-T-5	YOY-06, T-05	Context: confirms the 2030 endpoint two years running
E20b	AR2022 **pp.6, 10, 16, 21** *(rev 2: previously cited "p8, p21"; p8 carries no target statement)*	p6: "ambitious climate targets to meet **net zero emissions by 2035**, with an interim target of an 80 per cent reduction in Scope 1 and 2 emissions by 2030". ~~**The document contains no emissions figures at all**~~ **[WITHDRAWN: p16 states "Our operations emit around 80,000 tonnes of carbon dioxide a year, which is equivalent to almost 18,000 passenger vehicles being driven for a year." The document discloses a whole-of-operations approximation and** no Scope 1, Scope 2, boundary or method**: no inventory.] Also newly recorded, p16: "We have also set an interim target of an 80 per cent net reduction by 2030 compared to** 2005 **levels": the 2005 base was in force from 2021-22, a period earlier than F-BASE-1 recorded.**	F-T-5, F-BASE-1	YOY-05, YOY-06, T-05, S2-38	**Issue identified: endpoint deferred 5 years; target set with no published inventory; 2005 base in force from this period**
E21	CRFD p24	Targets "informed by the NSW Government Net Zero Future Act 2023… and by **science-based target-setting methodologies** for annual decarbonisation"; "**aligned with the emissions reduction goals of the Paris Agreement**"; "Although they have not been formally validated by an external body (e.g. Science Based Targets Initiative), Hunter Water regularly engages an external technical expert to review the inputs, assumptions and methodologies"	F-T-6	A-06, T-SBTi-01, T-SBTi-03, C-SBTi-02, T-13, A-16	Issue identified: framework-halo on an unvalidated, Scope 1+2-only, credit-dependent target
E22	CRFD p11–13, Table 1; p12	Physical risks by type and horizon; "Over **80% of drinking water is sourced from the Williams River catchment**"; flood/sea-level/storm, heatwave/bushfire, drought exposure; asset-level climate vulnerability assessment completed this year; NSW DCCEEW Climate Risk to Assets Dashboard pilot underway	F-NAT-1	N-01, N-02, S2-02, DR-06	Reconciled (qualitative, relevant coverage)
E23	CRFD p20	Risks assessed across three horizons "using a **high emissions scenario (RCP 8.5)** as the basis for this analysis"; qualitative consequence/likelihood matrices; no other scenario applied	F-NAT-2	S2-02, S2-05, N-01, DR-05	Issue identified: single-scenario, qualitative

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
E24	CRFD p15, p18	"During 2024-25, Hunter Water **did not identify any material impacts** on our business model, financial position or performance that can be directly attributed to climate change"; "**material asset revaluations or impairments are considered unlikely**"; financial quantification "remains an area for further development"	F-AP-3	L-11, S2-33..37, S2-47, A-05	Cannot verify: conclusion unquantified and unreconciled to the capital programme
E24a	AR2025 p33	Grahamstown Dam top water level lowered to 12.0 m AHD (~90% capacity) July 2024, then 11.5 m AHD (**~82% capacity**) September 2024: a **dam-safety / earthquake** measure. Not referenced in the CRFD's water-security risk assessment	F-NAT-3	DR-06, DR-02, S2-47, N-01	Observation: cross-source; driver is dam safety, not climate
E25	CRFD p1, p4, p23; Table 5	"prepared in accordance with **NSW Treasury Policy and Guidelines Paper TPG24-33**"; "As a 'Phase 1' entity, Hunter Water is part of the first group of NSW entities **required** to implement mandatory climate-related financial disclosures"; TPG24-33 "primarily informed by… AASB S2" but "**not yet fully aligned**"; emissions "calculated in accordance with the NGER Act… and the NGER Measurement Determination 2008 (2024 update)"; Method 1 throughout; WSAA Simple Wastewater Treatment Calculator	F-AP-1	L-01, L-02, L-13, A-06, G-01, G-12, S2-27	Reconciled: mandatory first year; method transparency is a strength
E26	NGER register FY2024-25 (as at 27/02/2026)	**No match for Hunter Water**: not a registered controlling corporation for the period. Veolia Holdings Australia Pty Ltd matched: Scope 1 945,868 t, Scope 2 157,970 t, net energy 5,186,538 GJ: **group-wide, not attributable** to Hunter Water's plants	O.2, F-GOV-3	A-01C, DR-02, DR-04, A-05	Reconciled (below threshold on own boundary); Veolia attribution cannot-verify
E27	CRFD p7–9, Figure 1; p20	Board plus five committees with named climate roles (Sustainability, Audit & Risk, Investment, People & Culture, Nominations & Governance); Executive Sustainability Standards Steering Committee; Group Manager Climate and Sustainability; climate integrated into the ERM framework May 2024; Asset Creation Framework climate screening for all capital works	F-GOV-4	GOV-01, S2-07..13, S2-47, A-16	No apparent issue: baseline (not credited)
E28	CRFD p16, p15	Belmont Desalination Plant: construction commenced in the period, commissioning on schedule for 2028, "required to operate on 100% renewable electricity" per the NSW planning condition of consent. Appendix A books **+6,500 t** of growth for it	F-T-3, F-S2-3	S2-42, T-09, E-23, A-16	Neutral: regulatory condition, not voluntary action; an emissions-increasing adaptation asset
E29	CRFD p14, Table 2	Climate opportunities identified (methane capture and biogas, biosolids, nutrient offsets, fleet electrification, blue carbon, decentralised systems). "**Not all of the identified opportunities have been costed or included in current financial planning**"	F-T-7	S2-14, S2-15, T-01, S2-33..37	Reconciled (transparent); opportunities unquantified
E30	AR2025 income statement p77; Note 1 basis of preparation	Total revenue $447,049k; profit after tax $19,406k; depreciation and amortisation $107,778k. Financial statements audited by the **Audit Office of New South Wales**; sustainability scorecard sits outside the audited statements. **Rev 2 addition: the audited statements do contain an express climate statement: "Management have considered the impact of climate risk on the Corporation's financial statements for the year ended 30 June 2025. The impact of climate-related matters on financial results and disclosures are included in the financial statements and notes in the ordinary course of business and where the effect of climate-related matters is considered material."**	F-AP-4, F-GOV-1, F-AP-3	L-08, A-07, A-13, GHG-STD-09	Reconciled: audit covers financial statements only; **a climate consideration statement is inside the audited perimeter, though no emissions figure is**

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS		
E31 **(new, rev 2)**	AR2025 p18 (customer report card) and p19 (Community Committee)	Customer report card measure under "Environmentally sustainable": "% reduction in carbon dioxide equivalent emissions compared to a 2020-21 baseline	**>80%**	Improve". An "ongoing Community Committee of approximately 50 members… will help keep us accountable for the delivery of our Customer Outcomes and annual performance assessment"; its first function is to "**Recommend a performance rating for each outcome on our customer report card**". Inaugural meeting **June 2025**. Reporting via the report card "will commence for the 2025-26 financial year". **Rev 3 precision: "The committee's feedback will be used to inform discussions with IPART" is the closing sentence of function 3 (consultation on mid-period changes to the report-card measures), not of function 1: the credit is taken on the rating role alone**	**F-4 (positive)**	A-16, GOV-01, S2-47, OUT-TB-18	**Positive (above baseline): qualified**: an external body with a defined rating role over the emissions measure, constituted in-period; no rating yet produced
E32 **(new, rev 2)**	CRFD p16 "Funding"; AR2025 p17	"Funding to progress our Climate Program has been included in the **2025-30 price determination by IPART** and Hunter Water's 2025-26 Business Plan (10 year financial forecast), including investment to implement initiatives outlined in the Net Zero Roadmap, **to reduce net Scope 1 and 2 emissions by 80% by 2030**… With inclusion in IPART's 2025-30 pricing determination, the initiatives **will be funded through customer fees and charges**." IPART released the final determination **June 2025**, applying 1 July 2025 – 30 June 2030. Figure 1A legend distinguishes "Emissions reduction (approved)" from "Emissions reduction opportunity (future decision)"	**F-3 (positive)**, F-T-2	A-16, T-06, S2-15, T-DEP-04	**Positive (above baseline): qualified**: a committed, externally approved, cost-recovered allocation for the 2030 tranche only; the determination and lever costings were not provided		
E33 **(new, rev 3)**	CRFD p24 and Table 4 fn ii **vs** AR2025 p18, p34, p56 + fn 3/fn 4 (full-text search of `Annual-report-2024-25(1).pdf`)	CRFD: "Both our 2035 target and our interim 2030 target are **net** targets, meaning they include the use of carbon offsets to compensate for hard-to-abate or unavoidable Scope 1 emissions"; fn ii: "4% of the 2030 target and 26% of the 2035 target will be met through **ACCUs** (tree planting projects)". AR2025 states the same 2030 target three times **without** "net", p18 report card "% reduction in carbon dioxide equivalent emissions compared to a 2020-21 baseline | **>80%** | Improve"; p34 "advance our goal to **reduce our greenhouse gas emissions by 80% by 2030**"; p56 target column "**80% reduction by 2030**" with fn 3 "80% reduction in operational greenhouse gas emissions (Scope 1 and 2) by 2030 compared to baseline". **Full-text search of AR2025 returns 0 occurrences of "ACCU", "carbon credit" and "carbon offset"** (the five "offset" hits are biobanking revenue, wastewater nutrient offsets, an R&D tax offset and two financial-modelling uses). "net zero" occurs once, at p56 fn 4, for the 2035 endpoint only	**F-T-10 (new)**, F-OFF-1, F-GOV-2, O.1	OUT-TB-05, OUT-TB-15, A-17, G-11, S2-40, E-20, DR-02	**Issue identified: the credit leg of the 2030 target does not appear in the audited annual report at all**		
E34 **(new, rev 3)**	CRFD p25, "Renewable energy targets" (same page, three consecutive paragraphs)	Target: "an absolute installed renewable energy capacity of **13 MW by 2030**". Immediately beneath: "Phase 1… **completed, delivering 6.4 MW**"; "Phase 2 has commenced, **with contracts awarded** for solar PV and battery energy storage systems at Cessnock and Shortland… This phase includes **8.3 MW** of new renewable energy." Reviewer arithmetic: 6.4 + 8.3 = **14.7 MW** delivered-plus-contracted against a 13 MW 2030 target. Table 4 rates the target "On track" at 6.4 MW	**F-T-9 (new)**, F-T-4	T-01, T-PROC-05, S2-14, A-16, AI-07	**Issue identified: a 2030 target already exceeded by contracted capacity disclosed on the same page**		

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
E35 **(new, rev 3)**	CRFD Table 3 p25 (reviewer calculation)	Scope 2 year on year, decomposed by operator: Hunter Water-operated **29,384 → 28,655 = −729 t (−2.5%)**; Veolia-operated **22,649 → 23,361 = +712 t (+3.1%)**; net **−17 t**. The onsite solar credited with the reduction is on Hunter Water-operated sites	F-S2-1, F-S2-5	A-19, G-BAU, S2-25, S2-26, OUT-TB-07	**Issue identified: the "flat" Scope 2 is two offsetting movements; the contractor-operated half rose 3.1%**

Annex C: Claim register (AI-18 / OUT-TB-15)

CLAIM ID	WORDING / PARAPHRASE	CLAIM OBJECT	CLAIM SOURCE & BASIS (OUT-TB-15)	DOC & LOCATION	STRENGTH	AUDIENCE	EVIDENCE REQ/FOUND/MISSING	TRIGGERED SCANS	RULE IDS	STATUS
C1	"net zero Scope 1 and 2 GHG emissions by 2035": a **net** target including ACCUs, "subject to confirmation of customer willingness to pay"	Net zero, Scope 1+2 only, by 2035 (**headline forward claim**)	Self-declared forward target; no certification; boundary correctly stated	CRFD p16, p24; Appendix A p30; AR2025 p56 fn 4	Strong forward claim, expressly conditional	Shareholder, IPART, community, employees	Found: boundary, net/gross split, 26% credit share, gross projections, roadmap levers. Missing: funded-vs-contingent split, gross target, credit permanence/supply, market-based baseline	10, 11, 03; A-17	S2-38, S2-39, S2-40, T-06, T-10, T-11, S2-15, T-DEP-04, A-17	Not substantiated as a commitment: endpoint unfunded and conditional; **wording itself is honest**
C1a	"80% net reduction by 2030, relative to 2020-21 emissions levels"	Interim net reduction target, Scope 1+2	Self-declared; net; market-based basis	CRFD p24, Table 4; AR2025 p56	Strong	Shareholder, IPART, community	Found: funded in the 2025-30 determination; roadmap lever composition. Missing: market-based baseline and current-year figure; one stated base year	11, 08, 06	S2-39, S2-41, T-BASE-01, G-10, E-01	Progress **not measurable** on the target's own method this period. **Rev 3: the claim is also stated two different ways across the suite: see C1b**
C1b **(new, rev 3)**	CRFD p24: "Both our 2035 target and our **interim 2030 target are net targets**, meaning they include the use of carbon offsets"; Table 4 fn ii: ACCUs deliver "**4% of the 2030 target and 26% of the 2035 target**" **vs** AR2025 p18 ">80%" reduction, p34 "reduce our greenhouse gas emissions by 80% by 2030", p56 "80% reduction by 2030" / fn 3 "80% reduction in operational greenhouse gas emissions (Scope 1 and 2) by 2030 compared to baseline"	The **same** 2030 target, stated as **net** in the climate report and as an unqualified reduction in the audited annual report and on the customer report card	Self-declared, in two documents of one reporting suite, for the same period	CRFD p24, Table 4 fn ii **vs** AR2025 p18, p34, p56 + fn 3	Strong in both, and materially different	Community, customers, shareholder, IPART	Found: the net framing and the credit shares, **in the CRFD only**. Missing from the annual report: the word "net", the credit share, the gross projection, and any reference to ACCUs, carbon credits or offsets (**0 occurrences on full-text search**)	10, 11, 03; A-17	OUT-TB-05, OUT-TB-15, A-17, G-11, S2-40, E-20, DR-02	**Claim-quality concern (F-T-10)**: the credit leg of the 2030 target is invisible in the document most readers open, and the p56 **G** is graded against that version

CLAIM ID	WORDING / PARAPHRASE	CLAIM OBJECT	CLAIM SOURCE & BASIS (OUT-TB-15)	DOC & LOCATION	STRENGTH	AUDIENCE	EVIDENCE REQ/FOUND/MISSING	TRIGGERED SCANS	RULE IDS	STATUS
C2	"a 13% reduction in emissions" / "This reduction was driven by increased onsite solar generation, consumed directly on site (behind the meter)"	Scope 1+2 reduction, 2020-21 → 2024-25, location-based	Self-declared; location-based; attributed to own asset	CRFD p25; AR2025 p34	Strong performance claim	Community, shareholder, media	Found: figures reconcile to the baseline. Missing: consumption, grid factors, own-action split. **Contradicted by** the same report's Appendix A and by AR2024	06, 03, 08	A-19, G-BAU, OUT-TB-07, E-01, T-MI-06, AI-07	**Attribution not supported**; beyond-BAU share cannot-verify
C3	"we are on track to meet our 2030 commitment"	Target-progress / on-track status	Self-declared; stated beside a red status indicator	AR2025 p34	Strong	Community, shareholder	Found: "While short of our annual target" co-located, with a cross-reference to p56 (rev 2, this **defeats** the buried-caveat limb). Missing: **the annual target itself, which is quantified nowhere**; the annual pathway; the year-on-year increase; a single method for grading the 2030 target	11, 03	S2-41, A-19, OUT-TB-02, OUT-TB-03, AI-07	~~**Contradicted within the reporting suite** (R / G / N/A)~~ **Recast rev 2: not contradicted; *untestable*. The red is against an unstated annual target, and the "on track" assertion is made in a year emissions rose 1.8%, an increase stated nowhere**
C4	"100% renewable electricity supply for our large sites by 2030, using contractual instruments" / "will progressively transition electricity supply for large sites to 100% renewable energy by 2030"	Renewable electricity, large sites only, contractual, forward	Self-declared; LGC-backed via the AGL PPA; **"inclusive of mandatory obligations under... Renewable Power Percentage"**	CRFD p25, Table 4 fn iv/v; Appendix A p30; AR2025 p34	Strong	Community, shareholder	Found: PPA commenced 1 Jan 2025; large-site definition (100 MWh/yr); 20%→100% LGC scaling. Missing: mandatory-vs-voluntary split, certificate register, retirement evidence, market-based Scope 2	08	E-07, E-09, E-11, E-14, E-21, E-23, E-24, S2-28, S2-42	**Claim-quality concern**: mandatory share counted inside a voluntary claim; certificate chain cannot-verify
C5	"aligned with the emissions reduction goals of the Paris Agreement"; "informed by... science-based target-setting methodologies"; "not been formally validated by an external body (e.g. Science Based Targets Initiative)"	Paris / science-based alignment of a Scope 1+2 net target	Self-declared; validation expressly disclaimed	CRFD p24	"Aligned with" = strong claim (A-06)	Shareholder, community, IPART	Found: the disclaimer, and that an external technical expert reviews inputs. Missing: the methodology, the pathway, any value-chain coverage	11, 03	A-06, T-SBTi-01, T-SBTi-03, C-SBTi-02, T-13, A-16	**Framework-halo claim-quality concern**; disclosure of non-validation earns no credit
C6	"carbon offsets equivalent to 4% of our 80% GHG emissions reduction target by 2030"; "26% of the 2035 target will be met through ACCUs (tree planting projects)"	Carbon-credit reliance inside a net target	Self-declared; Australian ACCU Scheme, sequestration (tree planting)	CRFD p24, Table 4 fn ii; Appendix A p29–30	Moderate-strong; quantified	Shareholder, IPART, community	Found: shares quantified, credit type stated, gross projections given. Missing: issuance/retirement records, permanence, supply plan, additionality; registration status contradictory	10, 06	E-08, E-09, E-10, E-19, E-20, G-11, S2-40, T-10	Partly reconciled (transparent shares); **integrity cannot-verify**
C7	"The project was registered with the Clean Energy Regulator under the ACCU scheme" **vs** "Hunter Water is currently working with the Clean Energy Regulator to register ACCUs"	ACCU project registration status	Self-declared; two contradictory statements in one document	CRFD p24 vs Appendix A p30	Moderate	Shareholder, regulator, community	Found: both statements; a January 2025 third-party audit of generation (~45,000). Missing: registration evidence; reconciliation of 45,000 vs 15,000 available	10	AI-07, E-08, E-19, A-05, DR-02	**Cannot verify: internally contradictory**

CLAIM ID	WORDING / PARAPHRASE	CLAIM OBJECT	CLAIM SOURCE & BASIS (OUT-TB-15)	DOC & LOCATION	STRENGTH	AUDIENCE	EVIDENCE REQ/FOUND/MISSING	TRIGGERED SCANS	RULE IDS	STATUS
C8	"13 MW installed renewable energy capacity by 2030" (6.4 MW, "On track"); climate-risk maturity "Embedded (level 4) by 2030" (Systematic, "On track"); **and (rev 2) "100% renewable energy electricity supply for our large sites (PPA)": rated "On track" with 2024-25 performance "N/A"**	Installed capacity; risk-maturity level; **renewable-electricity supply**	Self-declared; capacity metric; maturity self-assessed; **PPA status asserted with tracking not yet commenced**	CRFD p25, Table 4 (**four target lines, three "On track"**)	Moderate	Shareholder, community	Found: capacity delivered and contracted; maturity method (Climate Risk Ready NSW Guide). Missing: emissions effect in tCO_2-e; independent maturity validation ("not a fully independent process"); **any basis for the PPA "On track", since fn v states tracking "will begin in the next reporting period"**	11, 08	T-PROC-05, T-01, A-16, S2-14, AI-07	Process/input metrics presented as performance; **one status asserted on an expressly untracked target**
C9	Emissions "calculated in accordance with the National Greenhouse and Energy Reporting Act 2007... as this is the required framework for regulatory compliance applicable to Hunter Water"	Method basis for the inventory	Self-declared; statutory method cited	CRFD p23; Table 5 p27–28	Strong calculation-method claim	Carbon accountants, regulator, shareholder	Found: Method 1 by source, WSAA calculator, factor sources named. Missing: factor values; **Hunter Water is not on the NGER register for the period**	06, 16	A-06, G-01, G-12, S2-27, A-01C, DR-04	Method transparency reconciled; the "required framework" framing may over-imply regulator verification
C10	Treatment-plant emissions are included even though "the strict definition of operational control under the NGER Act is not met for these operations"	Inventory boundary, wider than statutory	Self-declared boundary election, disclosed and reasoned	CRFD p23	Moderate; disclosed plainly	Carbon accountants, regulator, shareholder	Found: rationale, disaggregation by operator, target inclusion. Missing: verification of the contractor's underlying figures	06, 12	G-04, G-05, GHG-STD-01, GHG-STD-07, A-16	**Positive (above baseline)**; underlying data cannot-verify
C11	"did not identify any material impacts on our business model, financial position or performance that can be directly attributed to climate change"; "material asset revaluations or impairments are considered unlikely"	No material current-period financial effect	Self-declared; unquantified	CRFD p15, p18	Strong negative assertion	Shareholder, IPART, Auditor-General	Found: the assertion, plus the robust-procedures rationale. Missing: quantification; reconciliation to the 40-year water security plan and the desalination build	04, 05, 14	L-11, S2-33..37, S2-47, A-05	**Cannot verify**: heightened scrutiny applied; unreconciled to the adaptation programme
C12	Report "prepared in accordance with NSW Treasury Policy and Guidelines Paper TPG24-33"; Phase 1 mandatory entity	Framework compliance	Self-declared; mandatory framework	CRFD p4	**Strict** ("prepared in accordance with")	Regulator, shareholder	Found: four pillars, requirements index, qualitative-first framing. Missing: associated gross target (MT9c); permanence disclosure (MT9d iv); one reconciled performance status (MT8)	04, 11, 10	L-01, L-02, A-06, S2-38, S2-40	Broadly compliant, minor limitations + **two potential compliance concerns**
C13	Report quality: external systems assessment; DCCEEW-coordinated review with "positive feedback on the fairness and connectivity of our disclosures"; legal firm "concluding our 2024-25 CRFD is well prepared and comprehensive"	Report-quality assurance impression	Third-party opinions asserted; none named, none published	CRFD p5	Strong impression	Shareholder, community, regulator	Found: the descriptions. Missing: identities, scope statements, the opinions themselves, **and none covers the figures**, which are expressly unverified	12	OUT-TB-04, OUT-RRB-05, OUT-EXT-07, L-08, A-05	**Cannot verify + assurance-halo claim-quality concern**

Annex D: Detailed findings, two-track (A-03)

D.1 Applicability gate & AASB S2 readiness (Sections 04–05)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-AP-1	Hunter Water is a NSW statutory State Owned Corporation under the Hunter Water Act 1991 and State Owned Corporations Act 1989: **not a Chapter 2M reporting entity**, so AASB S2 and ASIC RG 280 do not bind it. It is a **Phase 1 entity required** to report under NSW Treasury TPG24-33 from 2024-25: this is a **mandatory first year, not a voluntary or pre-mandatory one**. The framework claim is the strictest available ("prepared in accordance with") and is tested strongly. TPG24-33 is "primarily informed by" AASB S2 and, per the entity, "not yet fully aligned"; no AASB S2 compliance claim is made. Financial statements audited by the Audit Office of NSW. [E25, E30] [L-01, L-02, L-02A, L-13, A-06, A-07]	Mandatory TPG24-33 year; **appears broadly compliant, minor limitations**: four pillars and a full requirements index delivered, qualitative-first per the framework. No Ch 2M / AASB S2 / RG 280 finding available	Structure and coverage are sound; the substance gaps are recorded at F-AP-2 and F-GOV-2. Note the framework's own first-year qualitative priority genuinely limits what can be required of the quantitative layer	Appears broadly compliant · High	Compliance findings are available on TPG24-33 but not on AASB S2 / Ch 2M / RG 280	Continue maturing toward full AASB S2 alignment as TPG guidance develops
F-AP-2	Two substantive TPG24-33 gaps. **(a)** A **net** target is disclosed (both 2030 and 2035) while the entity states "Hunter Water does not have a formal gross GHG emission reduction target", offering projections instead (76% by 2030, 74% by 2035) that are expressly contingent on investment decisions not yet made: where the framework requires an entity disclosing a net target to **separately disclose its associated gross target**. **(b)** No permanence, reversal or carbon-maintenance basis is disclosed anywhere for the ACCUs the target relies on, though the framework names permanence expressly as a factor users need to judge credit integrity. [E9, E11c] [S2-40, T-10, E-10, G-11]	**Potential compliance concern** on both limbs: against the mandatory framework, not a voluntary one	Without a gross target nothing constrains the abatement side; credits can always close a net gap. Without a permanence basis the durability of the endpoint cannot be judged	Potential compliance concern · Medium-High	The abatement side of the pathway is unconstrained and the credit side is untestable	Set and disclose a gross Scope 1+2 target beside the net target; disclose the permanence period, reversal buffer and bushfire-exposure treatment for the credits
F-AP-3	The report states no material impacts on business model, financial position or performance were identified in the period, and that "material asset revaluations or impairments are considered unlikely": while the same suite describes a 40-year Lower Hunter Water Security Plan, a desalination plant under construction specifically to address drought risk, an asset-level vulnerability assessment that identified vulnerable assets, and funding for the Climate Program inside the IPART determination. Neither the conclusion nor the exposure is quantified, and the DCCEEW dashboard pilot that would quantify it is still in progress. [E24, E22, E28] [L-11, S2-33..37, S2-47, A-05]	Framework prioritises qualitative disclosure in year one → **not a compliance finding**; recorded as cannot-verify	Heightened scrutiny applies to a no-material-impact assertion (L-11). The assertion and the climate-driven capital programme are not reconciled, and the distinction between "impacts attributable to climate change in the period" and "climate-driven capital response" is real but never drawn for the reader	Cannot verify: material evidence missing · Medium	Users cannot size climate-related financial exposure or test the impairment conclusion	Quantify exposure by asset class from the dashboard pilot; reconcile the no-material-impact conclusion with the adaptation capital programme
F-AP-4 **(qualified, rev 2)**	Statutory audit covers the **financial statements only** (Audit Office of NSW; "Start of Audited Financial Statements" marker). The p34 status table and the p56 sustainability scorecard: which carry the emissions statuses: sit **outside** the audited statements, as does the entire CRFD. **Rev 2 qualification: the audited statements are not silent on climate. Note 1 states "Management have considered the impact of climate risk on the Corporation's financial statements for the year ended 30 June 2025. The impact of climate-related matters on financial results and disclosures are included in the financial statements and notes in the ordinary course of business and where the effect of climate-related matters is considered material." So ~~the audited perimeter does not reach any of them~~ is too absolute, a climate *consideration statement* is inside the audited perimeter; no emissions figure or status is.** [E30, E6, E6a] [L-08, A-07, A-13]	No apparent issue: the audit scope is what it is and is marked	The reporting suite is fragmented: the emissions figures and statuses appear across three places and the audited perimeter reaches none of them, though it does carry an unquantified climate-consideration statement. A reader is unlikely to know which parts are audited	Decision-usefulness · Medium	Readers may assume the annual report's scorecards carry audit comfort	Mark the audited perimeter clearly where the emissions figures and statuses appear; and state what the Note 1 climate consideration did and did not test

D.2 GHG inventory foundation & Scope 1 (Sections 06–07)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-INV-6 **(new, rev 2)**	**The narrative Scope 1 source list is not complete on the document's own terms.** CRFD p23 states, exhaustively, "our total Scope 1 emissions are from: methane (CH_4) and nitrous oxide (N_2O) from the wastewater treatment processes, sulphur hexafluoride (SF_6) emissions from facilities using gas-insulated switchgear (due to leaks), and the combustion of liquid fuel in company vehicles, plant and machinery." Table 5 (p27) discloses a fourth activity under Scope 1: "**Natural gas used in boiler**", with its own method ("Emissions from gaseous fuels are calculated using Part 2.3 - Method 1"). [CRFD p23, Table 5 p27] [G-06, S2-25, GHG-STD-04, AI-07]	Not a compliance finding: the source is disclosed in the methodology table	Small in magnitude, but the sentence a reader relies on to know what is inside Scope 1 is framed as exhaustive and is not. It also removes from view a stationary fossil-fuel source that carries no disclosed cessation pathway (Annex F, Clean Alternative Assessment)	Decision-usefulness (minor) · High	The composition of Scope 1 is understated in the text a reader meets first	Complete the p23 list to match Table 5; disclose the boiler's fuel volume and its replacement pathway
F-INV-1	Method is disclosed source by source: NGER Act 2007 and NGER (Measurement) Determination 2008 (2024 update), Method 1 for wastewater N_2O and CH_4, Part 2.4 Method 1 for liquid fuels, Part 2.3 Method 1 for gaseous fuels, Part 4.5 mass balance for SF_6, Method 1 with NSW grid factors for electricity, and the WSAA Simple Wastewater Treatment Calculator. Activity data sources named per line (fuel invoices, gas gauges, electricity invoices, contractor reports, Veolia emissions report). **But the factor values used are not disclosed, and no Basis of Preparation was provided.** [E25, E1] [G-01, G-12, S2-27, S2-05]	**No apparent issue: baseline (not credited)**; method disclosure is what a credible discloser does	Source-by-source method naming is genuinely useful and unusually granular. It stops short of reproducibility: without the factor values a reader cannot recompute any figure or separate factor movement from activity movement	Decision-usefulness (minor) · High	Figures cannot be independently recomputed; factor-driven movement is invisible	Publish the emission factor applied to each source in each period, and release the Basis of Preparation
F-INV-2	Table 3 is **internally consistent throughout**: all nine component sums and all seven percentage-change cells verified (fidelity §1). Scope 1 and Scope 2 are disaggregated by operator (Hunter Water-operated vs Veolia-operated), which is the disaggregation that matters for this boundary. [E1] [G-06, S2-25, S2-26]	No apparent issue: baseline (not credited)	Clean, reconcilable arithmetic and a genuinely informative disaggregation. This is the strongest part of the quantitative layer	No apparent issue · High	—	Maintain; add market-based Scope 2 as a parallel column

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-INV-3 **(qualified, rev 2)**	**Scope 1 has risen 31%** since the baseline (14,135 → 18,516) and **7.2% in this year alone** (17,270 → 18,516), with Hunter Water-operated sites up **17.3% in one year (5,533 → 6,492) and 35.6% on the baseline (4,786 → 6,492)** against 28.6% for the Veolia-operated column. SF_6 was recorded nil ("no emissions were recorded this year, as there were no changes in stock"). ~~so the growth sits in wastewater process CH_4/N_2O and fuel~~ **[sharpened rev 2: Table 5 sources the wastewater CH_4/N_2O to the "Veolia emissions report" and the CRFD states "the day-to-day operations of** all **water and wastewater treatment plants are devolved to a third-party contractor (Veolia)". On the document's own mapping the HW-operated Scope 1 column is therefore liquid fuel in fleet, plant and machinery plus the natural-gas boiler plus SF_6 (nil): i.e.** the fastest-growing component of the whole footprint is Hunter Water's own direct fossil-fuel combustion**, not the process emissions. Recorded as a reviewer derivation from the source mapping; the CRFD does not state the split by source.]** ~~No explanation is offered in any document.~~ **[WITHDRAWN as absolute: CRFD Appendix A's "Growth" note discloses "Increased emissions from population growth leading to additional operational activity..." and p30 states "Emissions are projected to grow in line with population growth". That is a generic driver attached to a** forward projection **bar spanning 2020-21→2029-30, not scope-specific, unquantified, and never reconciled to the realised rise. The correct statement is that** no source-and-driver decomposition of the realised increase appears in any document**.]** Scope 1 has gone from 17.4% to 26.3% of the footprint. ~~for which the only material lever offered is credits~~ **[corrected: Table 2 names methane capture, biogas, renewable natural gas, methanol from biosolids, waste-to-energy and fleet electrification; but "Not all of the identified opportunities have been costed or included in current financial planning", the only quantified direct-emissions lever in Figure 1A is "fleet electrification −1,500" in the 2030-35 tranche, and the Appendix A assumption is that "Emission reduction shortfalls in 2030 and 2035, primarily from unavoidable emissions in wastewater treatment, will be offset using ACCUs". So: levers are *identified*, none for wastewater process emissions is *costed, dated or quantified*, and the only quantified answer to the shortfall is credits.]** [E2, E1a, E29] [G-06, S2-25, G-12, S2-05, A-19]	Framework does not require driver analysis in year one → not a compliance finding	A growing component with no funded lever, and on the entity's own attribution the growth is led by its own fossil-fuel burning. A reader cannot distinguish load growth from capital-works contractor fuel, process change, method change or factor change	Decision-usefulness concern · High	The credibility of the endpoint cannot be assessed; the growing part of the footprint has no decomposed driver	Decompose the increase by source and driver; split combustion from process emissions in the reported series; cost and date the wastewater and fleet levers already identified as opportunities
F-INV-4	**Boundary election above baseline.** The NGER operational-control test **excludes** the Veolia-operated water and wastewater treatment plants (Veolia reports them). Hunter Water includes them anyway, in the inventory **and** inside its targets, reasoning that it "retains ownership, benefits directly from their operation, and holds overall accountability for their performance, associated risks and long-term capital investment". Those plants are ~65% of Scope 1 and ~45% of Scope 2: about **50% of the total footprint**; reporting on the statutory boundary would have disclosed ~35,100 t instead of 70,532 t. **Rev 2 qualification: the *reason* for the NGER exclusion changed between periods and the earlier account is not correct. AR2024 p43 says "other reporting frameworks, like NGER, categorise these emissions as Scope 3", NGER has no Scope 3 category, while the CRFD says the plants are excluded because the operational-control test is not met. The decision remains above baseline; its stated rationale is not consistent across the series (E7c, F-21).** [E3, E3a, E7c] [G-04, G-05, GHG-STD-01, GHG-STD-07, A-16, DR-02]	No apparent issue; exceeds the statutory requirement	**Positive (above baseline)**: a boundary decision taken against the entity's own interest that roughly doubles its reported footprint and accepts target responsibility for the larger number. This is the most substantive element in the disclosure. **The rationale inconsistency is recorded against the disclosure, not against the decision**	**Positive (above baseline)** · High	: (credited)	Maintain; state the operational-control basis consistently across periods and correct the prior-year NGER-Scope-3 characterisation; extend the same completeness logic to Scope 3; obtain verification of the contractor's underlying figures (F-GOV-3)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-BASE-1 **(strengthened, rev 2)**	**The target base year is unstable across the suite. AR2022 already set the interim target as "an 80 per cent net reduction by 2030 compared to 2005 levels" (p16)**: so the 2005 base was in force from **2021-22**, a period earlier than this review originally recorded. AR2023 repeated "compared to **2005** levels" with a baseline of **82,097** tCO_2-e and reported an 11% reduction on that base. From AR2024 the baseline became **2020-21** at **81,025**, then 81,026 in AR2025 and CRFD Table 3: **with no restatement note anywhere**. CRFD **Table 4** states the base period as **2021-22**. CRFD **Appendix A** uses a fourth figure, **79,000**, on the **market-based** method. Separately, ~~**AR2022 launched the net-zero-2035 target while disclosing no emissions figures at all**~~ **[corrected: AR2022 disclosed one whole-of-operations approximation, "around 80,000 tonnes of carbon dioxide a year" (p16), and no Scope 1, Scope 2, boundary or method]**: so the year the CRFD names as its base period has **no published inventory**. [E19, E19a, E20b] [G-10, T-BASE-01, S2-39, YOY-04, AI-07]	Framework requires the base period to be disclosed (MT6f): it is, but **inconsistently across the suite** → potential compliance concern at the margin	Progress cannot be measured against a moving baseline. Three base periods, three values and two methods, none reconciled, on the target that carries the disclosure. The 2005→2020-21 shift is the kind of change the framework's measurement-change requirement exists to surface	Decision-usefulness → potential compliance concern · High	Neither the 13% nor the 80% target can be tied to a stable base	Publish one base year with its value and method; reconcile 2005 and 2020-21; correct the 2021-22 reference; publish the 2021-22 inventory or state it is unavailable
F-INV-5	**Comparability limitations, stand-alone.** Three features make like-for-like comparison difficult without adjustment: a boundary deliberately wider than the NGER statutory test (so the figure is not comparable to a peer reporting on the statutory boundary); performance reported location-based against a market-based target; and no intensity metric published in any period. [E3, E12, E1] [OUT-TB-08, OUT-EXT-09, GHG-STD-01, GHG-STD-11]	No apparent issue: no comparability claim is made	Assessed stand-alone; not ranked against peers. The wider boundary is the *more complete* choice, so the comparability cost is a consequence of a good decision, but it is a cost, and the report does not state the statutory-boundary figure that would let a reader bridge	Decision-usefulness (minor) · Medium	Cross-entity comparison requires adjustment the report does not enable	Disclose the statutory-boundary subtotal alongside the wider figure, and publish an intensity metric (per property, per ML treated)

D.3 Scope 2 & renewable electricity (Section 08)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-S2-1	**The reduction is attributed to own action; the company's own roadmap says otherwise.** CRFD p25: the 13% reduction "was driven by increased onsite solar generation, consumed directly on site (behind the meter)". CRFD Appendix A, in the same document: the reduction "**primarily results from grid decarbonisation**". AR2024 had disclosed grid decarbonisation as a driver; the current report drops it. Quantitatively, the roadmap books **−43,000 t from grid decarbonisation of a 78,000 t total 2030 reduction effort: about 55%**: against own action (onsite renewables + energy efficiency) of −18,000 t (~23%), renewable contracts −14,000 t (~18%) and credits −3,000 t (~4%). And in the year onsite capacity roughly doubled (2.96 → 6.4 MW), **Scope 2 fell by 17 tonnes** (52,033 → 52,016) while total emissions **rose 1.8%**. Electricity consumption and grid factors are not disclosed in any period, so the historical split is not computable. [E7, E7a, E7b, E8, E8a, E1a] [A-19, G-BAU, OUT-TB-07, E-01, T-MI-06, AI-07, YOY-03, YOY-05]	Framework does not mandate BAU decomposition → not a compliance finding	Business-as-usual grid movement is not the entity's achievement and must not be credited. Here it is the majority lever, the entity's own appendix says so, the prior year said so, and the current performance narrative says the opposite. The beyond-BAU share is **cannot-verify** because consumption and factors are undisclosed: the review does not assert a number	Decision-usefulness → claim-quality concern · High	A reader credits the company for movement the grid delivered; the own-action share is invisible	Restore and quantify the grid attribution; publish consumption and factors; decompose every reported reduction into consumption change, factor change, contractual instruments and credits

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-S2-2	**Measured on one method, targeted on another, with the target's method unreported.** Performance is reported **location-based**; the targets were set on, and will be tracked on, the **market-based** method; market-based Scope 2 has not been reported for any period and begins 2025-26. The AGL PPA ran for half the reporting period with no market-based figure to show its effect. This is why CRFD Table 4 records performance against the operational GHG target as "**N/A**". Appendix A compounds it by stating the 79,000 baseline is market-based while Table 3's 81,026 is location-based. [E12, E6b, E19a] [E-01, S2-28, G-10, T-MI-06, GHG-STD-08, S2-06]	Location-based Scope 2 is disclosed as required (MT4) → no apparent issue on that limb	Progress against the target that matters is not measurable this year on the target's own basis. Two baselines on two methods sit in one document. Transparent about the transition, which is baseline candour, not a credit, but the reader is left with no measurable target position	Decision-usefulness concern · High	The 80%-by-2030 target has no measurable progress position for 2024-25	Publish market-based Scope 2 for the baseline and the current year alongside location-based, and restate progress on the target's basis
F-S2-3	**The PPA's effect is sized two different ways across periods.** AR2024 p15: the agreement "is expected to lower our operational carbon footprint (Scope 2 emissions) by approximately **70% by 2030**". CRFD Appendix A sizes the "AGL renewable energy contract" lever at **−10,500 t**, about 20% of current Scope 2, with grid decarbonisation booked separately at −43,000 t. The two statements may measure different things, the agreement's own effect versus total Scope 2 reduction by 2030, but the report does not reconcile them. [E13, E8] [DR-02, AI-07, A-05, E-24, T-MI-06]	Not a compliance finding	A reader taking the AR2024 figure at face value would attribute to the PPA most of a reduction the roadmap attributes chiefly to the grid. Unreconciled, this is cannot-verify rather than a divergence finding	Cannot verify · Medium	The PPA's contribution cannot be sized	Reconcile the two statements on one basis, and size the PPA lever explicitly against total Scope 2
F-S2-4	**The "100% renewable" target expressly counts the mandatory renewable share.** The roadmap assumption: the PPA "will start with a proportion of 20% and scale up to 100% of LGCs for all large-scale asset consumption by 2030, **inclusive of mandatory obligations under Australian Government DCCEEW Large-Scale Renewable Energy Target (Renewable Power Percentage)**". The Renewable Power Percentage is the statutory LRET obligation already embedded in every customer's supply; certificates surrendered for that obligation support the liable entity's compliance, not a customer's voluntary claim. The report does not disclose the mandatory-vs-voluntary split. [E14, E13] [E-07, E-09, E-11, E-14, E-21, E-23, E-24, S2-42]	Not a compliance finding on the framework; a claim-quality matter	Compliance with a legal obligation should not be presented as voluntary climate leadership without the distinction being drawn. The voluntary increment inside "100% renewable" is smaller than the claim implies, and by how much is undisclosed	Decision-usefulness → claim-quality concern · Medium-High	"100% renewable" over-reads the voluntary procurement actually undertaken	Disclose the split between mandatory Renewable Power Percentage and voluntary additional certificates, and state the voluntary increment separately
F-S2-5	**Real, self-owned, behind-the-meter generation: the genuine own-action lever.** 6.4 MW installed (Phase 1 complete), including the 3.1 MW Balickera Solar Farm commissioned late 2024 powering Grahamstown Water Treatment Plant and the Tomago borefields; 8.3 MW further contracted at Cessnock and Shortland. Generation is self-consumed rather than sold as an attribute, so it reduces location-based emissions physically with no certificate doing the work. **But**: 2024-25 generation is not disclosed (FY22 1,685 MWh at 1.74 MW; FY24 4,054 MWh at 2.96 MW with "80% self-consumed onsite, remainder exported to the grid"); the emissions effect is never quantified; certificate treatment for the systems is not disclosed; and in the year capacity doubled Scope 2 fell 17 t. **Rev 2: the qualification is now materially heavier: the series itself does not reconcile (F-S2-8). AR2023 repeats AR2022's capacity and generation verbatim for a later year, AR2024 reports 4.05 GWh as "a 25% increase year on year" when the last disclosed year was 1,685 MWh (+141%), and its capacity step (1.74 + 0.40) does not reach the 2.96 MW it states.** [E15, E1a, E17, E7e] [E-16, E-03, E-15, T-01, S2-14, A-16]	No apparent issue	**Positive (above baseline): qualified.** An implemented operational intervention, physical and self-owned. The qualification is substantial: the effect is unquantified and unevidenced in the year it should have appeared, and exported generation does not reduce Hunter Water's own emissions	**Qualified positive** · Medium	: (credited, qualified)	Publish annual generation, the self-consumed vs exported split, the tCO_2-e avoided, and the certificate treatment for each system
F-S2-6 **(corrected, rev 2)**	**Certificates are received and not accounted for publicly.** The audited financial statements recognise "renewable energy certificates received" as a non-cash item in both 2023-24 and 2024-25, but no volume, register or disposition: retained, retired or sold: appears anywhere in either document, and whether the onsite systems create certificates is not stated. ~~The quantum is not recoverable from the statements (fidelity X-4).~~ **[WITHDRAWN: the quantum *is* recoverable. AR2025 Note 20, p107: $(59)k for 2025 and $(201)k for 2024, anchored by "Net profit for the year from operations 19,406" and "Depreciation and amortisation 107,778", both matching the audited income statement. What is absent is the** certificate volume**, the register and the disposition: not the dollar figure. Newly noted: the recognised value fell 71% in the year onsite capacity roughly doubled, which is not explained.]** This matters because the 2030 target is market-based and depends on certificate retention. [E17, E12, E15] [E-02, E-03, E-15, E-16, E-23, A-05, P-02]	Not a compliance finding for the period (no market-based claim yet made)	Renewable claims follow attribute ownership and retirement. With a market-based target commencing next period and certificates already flowing, the absence of any certificate accounting is a live gap, not a future one	Cannot verify: material evidence missing · Medium-High	The market-based target's foundation cannot be tested	Provide a certificate register: creation, ownership, transfer, surrender, beneficiary and period, reconciled to consumption

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-S2-7	**Roadmap levers may overlap on the same electricity.** The baseline is stated as market-based, yet the roadmap books −43,000 t from grid decarbonisation **and** −14,000 t from renewable electricity contracts. Under market-based accounting, electricity matched with retired certificates is already zero-rated and cannot also deliver a grid-decarbonisation saving; the report does not show how the two levers are prevented from applying to the same MWh. [E8, E12] [E-01, E-06, E-15, T-MI-06, A-05]	Not a compliance finding	A reader cannot confirm the pathway is not double-counting its two largest electricity levers. The review does not assert double counting: the disclosure simply does not resolve it	Cannot verify · Medium	The 2030 pathway's arithmetic cannot be validated	Publish a lever-by-lever reconciliation on one stated method, showing the electricity base each lever applies to and the residual
F-S2-8 **(new, rev 2)**	**The onsite-generation series: the evidence base for the entity's only genuine own-action lever: does not reconcile across three successive annual reports.** AR2022 (for 2021-22): "already installed **1.74 megawatts** of solar… we generated **1,685 megawatt hours**". AR2023 (for 2022-23): "Expanded our total renewable energy generation capacity to **1.74 MW** and generated **1,685MWhr**": the same two values, a year later. AR2024 (for 2023-24): "Increased total onsite electricity generation to **4.05GWh, a 25% increase year on year**"; "Commissioned an additional **400kW** of solar"; "Expanded our total renewable energy generation capacity to **2.96MW**". Reviewer arithmetic: 4,054 / 1,685 = **+141%**, not +25%; a 25% rise implies an undisclosed prior year of ≈**3,243 MWh**; and 1.74 + 0.40 = **2.14 MW ≠ 2.96 MW**, a 0.82 MW gap. 2024-25 then publishes capacity only. [E7e, E15] [YOY-02, YOY-04, AI-07, A-19, S2-14]	Prior-period annual reports; not a current-period compliance finding	The review's own capacity narrative ("capacity roughly doubled") and the entity's own solar-attribution claim both rest on this series. A repeated year, a growth rate that does not match its own denominator, and a capacity step that does not add up mean the series cannot support either. The metric that would evidence the current-year claim, 2024-25 generation, is the one that stopped being published	Decision-usefulness concern · High	The own-action lever cannot be tracked or verified across periods	Restate capacity and generation on one basis for every period; state which prior-year figure the "25% increase" was measured against; reconcile the 0.82 MW; publish 2024-25 generation with the self-consumed / exported split

D.4 Scope 3 & value chain (Section 09)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-S3-1	**Scope 3 is not quantified for any category in any period, and no bounding estimate exists.** The only reference is a "Scope 3 Emissions Roadmap" box in CRFD Figure 2: "Build understanding of the largest Scope 3 emission sources and identify emissions reduction opportunities": with no figure. AR2024 had listed "building out Scope 3 emissions data"; it was not delivered. For this business the material categories are obvious: **C2 capital goods** (the Belmont Desalination Plant under construction, EPA-agreed treatment-plant upgrades, mains renewals), **C1 purchased goods and services** (treatment chemicals, the Veolia O&M contract, pipes and materials), **C3 fuel- and energy-related** (transmission and distribution losses on the electricity behind 52,016 t of Scope 2) and **C5 waste** (biosolids, named in the report as an emissions *opportunity* while the emissions go uncounted). C11 use of sold products (customer-side water heating) is neither addressed nor ruled out. TPG24-33 MT1 requires Scope 1 and 2 only, so this is **not a compliance failure**. Under OUT-STK-13 the material category completeness is not confirmable: no total, no categories, no bound: which **caps the carbon-accounting audience at 1**. [E18, E28, E29, E1] [S2-29, S2-30, G-08, G-15, G-19, S3-01, S3-02, S3-19, S3A-01, S3A-02, S3A-03, OUT-STK-13]	**No apparent issue against TPG24-33 for year one**: the framework does not require Scope 3	The value chain of an asset-intensive utility mid-construction on a major plant is invisible. A carbon accountant cannot lift the footprint or rule out a material exclusion; a reader cannot tell whether the excluded value chain is larger or smaller than the 70,532 t reported. Estimation is not required to be sophisticated: a spend-based screen would resolve most of this (S3-EST)	Decision-usefulness concern · High	Carbon-accounting audience capped at 1; the true footprint is unknowable	Publish a category-level Scope 3 screening estimate with a total, spend-based is acceptable and expected as a starting point, plus a stated exclusion list with reasons
F-S3-2	The net-zero target is **explicitly bounded to Scope 1 and 2** in every place it appears: "net zero Scope 1 and 2 GHG emissions by 2035", "operational GHG emissions", and in the AR scorecard footnote "(Scope 1 and 2)". No claim is made that the target covers the value chain. [E10, C1] [OUT-TB-05, OUT-TB-15, A-17, S2-40]	No apparent issue	**Materially better than a value-chain claim on an unquantified base.** The claim object matches the evidence boundary, so the Scope 3 gap is a completeness limitation rather than a headline-integrity failure. This is why A-17 does not set the ceiling here: the headline that fails is the *performance* claim (F-GOV-2), not the target's scope	No apparent issue on claim boundary · High	Scope 3 absence does not make the target claim misleading	Maintain the honest bounding; add Scope 3 coverage over time

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-S3-3	**Scope 3 exclusion is by silence, not by reasoned exclusion.** No category is marked "not applicable", no relevance test is described for Scope 3, no materiality reasoning is given, and no improvement pathway with a date is disclosed: only a roadmap box committing to "build understanding". [E18] [S3-19, S3-16, S3-26, G-09, G-18, GHG-STD-04]	Not required for year one	Silence is weaker than a reasoned exclusion. "Not measured" is the accurate description and is not stated; a reader cannot tell which categories Hunter Water considers material	Decision-usefulness (minor) · Medium	The exclusion cannot be evaluated	State which categories are considered material and which are not, with reasons, and publish a dated Scope 3 delivery plan

D.5 Offsets, credits & net claims (Section 10)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-OFF-1	**Gross and net are separated, and the credit share is quantified.** Both targets are stated as net; ACCUs are disclosed as delivering **4% of the 2030 target and 26% of the 2035 target**; and projected gross reductions are given (76% by 2030, 74% by 2035) with the 2-percentage-point deterioration explained by population growth: even though the entity states it has no formal gross target. ~~**No credits have been surrendered to date.**~~ **[Qualified rev 2: no source statement says so. This is a reviewer inference from the report's forward framing: "we plan to surrender a portion of the ACCUs", "Ongoing annual surrendering of ACCUs will likely be required… from 2029-30 onwards": and from the absence of any retirement record. It should be read as "no surrender is disclosed in any period", not as a positive statement of nil.]** [E9] [G-11, E-08, E-20, S2-40, T-10, A-16]	No apparent issue: the framework requires this separation and it is provided	Baseline expected, **not credited** (A-16): but it is the disclosure that makes the credit-dependence and the rising-gross issues findable at all. Restated plainly: the 2035 "net zero" position is about **74% abatement plus 26% tree planting**, with gross emissions higher in 2035 than 2030	No apparent issue on separation; **decision-usefulness on substance** · High	Readers can see the credit dependence if they reach Appendix A; the front-of-report claims do not carry it	Carry the gross/net split and the credit share into the target statement itself, not only the appendix (and see F-AP-2 on the missing gross target)
F-OFF-2	**The credit programme is internally contradictory and unreconciled.** Registration: "The project **was registered** with the Clean Energy Regulator under the ACCU scheme" (p24) against "Hunter Water **is currently working with** the Clean Energy Regulator **to register** ACCUs" (Appendix A). Volume: a January 2025 third-party audit concluded "approximately **45,000 ACCUs were generated**" over 1 July 2017 – 30 June 2024, against "up to **15,000** ACCUs… currently available", a ~30,000 gap with no reconciliation. No issuance, holding or retirement record was provided. [E11, E11a, E11b] [AI-07, E-08, E-09, E-19, E-20, A-05, DR-02]	Not a compliance finding on the framework; a claim-integrity matter	The instrument delivering 26% of the endpoint has a registration status the document states two ways and a volume that does not reconcile. "Generated" is not "issued", and neither is "available"	Cannot verify: serious concern, because a material target component depends on missing evidence · Medium-High	The credit leg of the 2035 target cannot be relied on	Confirm and correct the registration statement; provide the CER project record, issuance history, current holding, and a reconciliation of 45,000 generated to 15,000 available
F-OFF-3	**Permanence is not addressed, on plantings the same report places in a bushfire-exposed setting.** The credits come from tree planting at Chichester and around Grahamstown Dam; CRFD Table 1 and p12 identify bushfire as a material physical risk to "assets located in bushfire-prone zones and inland areas". **No permanence period, reversal-risk buffer or carbon-maintenance basis appears anywhere in the document**: despite the framework naming permanence expressly. [E11c, E22, E11] [E-10, E-08, A-05, DR-05, N-01]	**Potential compliance concern**: the framework names permanence as a required credibility factor (see F-AP-2(b))	The offsets that deliver a quarter of the 2035 endpoint are exposed to a climate risk the same report identifies as material to its own assets, and the report does not connect the two	Cannot verify → potential compliance concern · Medium-High	The durability of the net-zero endpoint cannot be assessed	Disclose the permanence period, reversal-risk buffer and how bushfire exposure to the planting sites is managed
F-OFF-4	**Credit supply looks materially short of the pathway requirement.** The 2035 endpoint needs roughly **20,500 t of credits annually** (79,000 × 26%): the report says "ongoing annual surrendering of ACCUs will likely be required… from 2029-30 onwards": against a project generating about **6,400 per year** (45,000 over seven years) with 15,000 available. The roadmap fills the gap with a new planting project on Hunter Water land at **Terreel** (−15,000), which is an undecided future investment "pending customer willingness to pay", with no area, method, yield or timing disclosed. [E11b, E9, E10] [E-08, E-19, T-11, S2-15, T-DEP-04, A-05]	Not a compliance finding	The endpoint depends on a sequestration project that does not yet exist, on land yet to be committed, subject to a willingness-to-pay test, and the annual requirement is roughly three times current project yield	Cannot verify → decision-usefulness concern · Medium-High	The 2035 endpoint has no evidenced credit supply	Publish the annual credit requirement against supply, and the Terreel project's method, area, expected yield and decision date

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-OFF-5	**Self-generated, self-surrendered credits, from a grant-funded project, are not distinguished from in-boundary sequestration.** The credits arise on Hunter Water's own land, from a project funded by a 2013 Commonwealth grant under the Lower Hunter Recycled Water Initiative, and are to be surrendered against Hunter Water's own emissions. No additionality basis is disclosed, and the arrangement is not characterised as insetting or distinguished from in-boundary removals. [E11] [E-08, E-10, E-19, G-11, A-05]	Not a compliance finding; additionality is governed by the CER method, which the review does not second-guess	A reader cannot distinguish this from netting in-boundary sequestration, and no additionality basis is offered. The review makes no finding on additionality: only that the basis is undisclosed and the treatment unstated	Cannot verify · Medium	Whether the credits represent additional abatement cannot be judged	Disclose the additionality basis under the applicable method, and state how self-generated, self-surrendered credits are treated against the target

D.6 Targets & transition (Section 11)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-T-1	**Target architecture.** Net zero Scope 1+2 by 2035; interim 80% net reduction by 2030 vs 2020-21; set by the Board in 2022 after option assessment, cost-benefit analysis and community input; informed by the NSW Net Zero Future Act 2023. Absolute (not intensity) targets, so T-14 does not bite. Roadmap reviewed at least annually. Gross projections and credit shares disclosed. [E9, E10, E8] [S2-38, S2-39, S2-40, T-01, T-10, T-14]	No apparent issue on architecture: absolute, dated, bounded, with an interim milestone	Sound architecture. The problems are not structural but substantive: the base year (F-BASE-1), the measurement method (F-S2-2), the funding (F-T-2), the credit leg (F-OFF-2/3/4) and the lever composition (F-S2-1)	No apparent issue on architecture · High	—	Maintain the absolute, dated structure; fix the substantive legs
F-T-2	**The 2035 endpoint is neither funded nor decided.** Funding for the 2030 pathway sits in the IPART 2025-30 determination and the 2025-26 Business Plan. The 2035 target requires "further emissions reduction investment decisions… in our **Price Path 2030 (PP30)**… pending customer willingness to pay", and the target itself is stated throughout as "**subject to confirmation of customer willingness to pay**". Investment beyond 2035, including adaptation actions, "**has not yet been quantified**". [E10, E8, E29] [T-06, T-11, S2-15, T-DEP-04, S2-42, A-17]	Framework requires target disclosure, not target funding → not a compliance finding	The condition is stated honestly and repeatedly: genuine transparency, though transparency about a dependency does not cure it. What is *not* disclosed is the consequence: which parts of the pathway are funded, what happens to the target if the willingness-to-pay test is not met, and what the fallback is. A target contingent on a future price determination is materially weaker than the word conveys	Decision-usefulness concern · High	The endpoint may not be pursued and a reader cannot see the trigger	State the funded-vs-contingent split, the willingness-to-pay test's timing and consequence, and the fallback actions
F-T-3	**Gross emissions rise between 2030 and 2035, and growth is a large offsetting force throughout.** Projected gross reduction falls from **76% (2030) to 74% (2035)**: the report explains the 2-percentage-point deterioration as "expected growth in population leading to additional operational activity". The roadmap adds **+9,000 t** portfolio growth and **+6,500 t** for the Belmont Desalination Plant to 2030, then **+1,500 t** more to 2035. So the "net zero" endpoint is reached while gross emissions are higher than five years earlier, with credits closing a widening gap. [E9, E8, E28] [T-07, T-09, S2-40, T-10, A-19]	Not a compliance finding	Growth-driven emissions increases inside a net-zero pathway, closed by credits rather than abatement. Disclosed clearly in the appendix, invisible at the front of the report. Belmont is also a climate-*adaptation* asset that increases the footprint: a real tension the report does not draw out	Decision-usefulness concern · High	The endpoint is credit-dependent and increasingly so	Publish the annual gross trajectory alongside the net one; state the growth-adjusted abatement requirement and how it will be met without credits

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-T-4 **(undercount corrected and hardened, rev 2)**	**Process and input metrics are presented as performance.** ~~Of the three target rows in Table 4, two are rated "On track"~~ **[CORRECTED: Table 4 has** four **target lines and** three **are rated "On track". The omitted line, verified by** `-layout` **re-extraction of p26, is "Energy management …** 100% renewable energy electricity supply for our large sites (PPA)[iv] **| Relative / quantitative	Base period N/A	…	Reporting period performance 2024-25** N/A **| Performance against target** On track**". Footnote v: "Hunter Water's PPA came into effect 1 January 2025 and therefore covers only part of the reporting period…** tracking progress towards our renewable energy target from contractual instruments will begin in the next reporting period." **So the table asserts a status for a target it states is not yet being tracked. Annex K.4 #5 recorded this line; the body findings did not.]** The three on-track lines are: installed renewable capacity (13 MW by 2030; 6.4 MW delivered); the PPA renewable-electricity target (performance "N/A", tracking not started); and climate-risk maturity ("Embedded" level 4 by 2030; currently "Systematic" level 3). The fourth line — the only emissions-outcome row — records performance against target "**N/A**". Maturity is **self-assessed**: a hybrid of internal self-assessment with third-party input which the report concedes "is not a fully independent process", with independent assessment only "likely" before 2030. [E16, E6b] [T-PROC-05, T-01, A-16, S2-14, GOV-12, AI-07]	No apparent issue on the use of other metrics (MT5) and their basis is disclosed → **but an "On track" rating on an expressly untracked target is a new potential MT8 concern**	Capacity and maturity describe effort, not climate outcome; the PPA line describes neither, because nothing is yet measured. Three greens against one unmeasurable emissions row reads as progress where none is demonstrated	Decision-usefulness concern · Medium-High **(hardened from the original)**	A reader sees three greens and misses that the emissions target has no measurable position and one of the greens has no measurement behind it	Report the emissions effect of installed capacity in tCO_2-e; label capacity and maturity as input/process measures; record the PPA target as "not yet tracked"; commission independent maturity assessment
F-T-5	**The endpoint was deferred five years and the deferral is not disclosed in the current period.** AR2020: "aspirational goals: **to be carbon neutral by 2030**". AR2021: "our goal to have **net zero emissions by 2030**". AR2022 onward: "**net zero emissions by 2035**, with an interim target of an 80 per cent reduction… by 2030". The claim also narrowed: "carbon neutral" (an unbounded whole-of-entity formulation) became "net zero Scope 1 and 2": and gained a willingness-to-pay condition. **No reconciliation to the prior 2030 endpoint appears in the current disclosure.** [E20, E20a, E20b, E10] [YOY-06, YOY-08, T-05, S2-41, A-18, A-16]	Framework requires disclosure of "any revisions to the target and an explanation" (MT7d) → the revision predates the framework's first year, but the current statement does not reconcile it	A target that moved out five years and narrowed its boundary reads, in the current report, as a commitment consistently held. The narrowing to Scope 1+2 improved the claim's *honesty* while the deferral weakened its *ambition*: both changes are invisible to a current reader. Continuity earns no credit; the 2019-20 aspiration earns none either	Decision-usefulness concern · High	A reader cannot see that the commitment was weakened	Disclose the change of endpoint from 2030 to 2035 and the change of scope, with reasons, in the target section
F-T-6	**Paris-alignment framework-halo.** Targets are "**aligned with the emissions reduction goals of the Paris Agreement**" and "informed by… **science-based target-setting methodologies** for annual decarbonisation", on a boundary excluding the entire value chain, an endpoint 26% delivered by credits, and gross emissions rising 2030→2035. Validation is expressly disclaimed ("not been formally validated by an external body (e.g. Science Based Targets Initiative)"), with an unnamed external technical expert reviewing inputs and assumptions. "Aligned with" is a strong claim and is tested substantially. [E21, E9, E18] [A-06, T-SBTi-01, T-SBTi-03, C-SBTi-02, T-13, A-16]	Framework requires disclosure of third-party validation status (MT7a) → **provided, and negative**: no apparent issue on that limb	Disclosing non-validation is baseline candour and earns no credit; it also does not narrow the alignment claim itself. A Scope 1+2-only, credit-dependent target with rising gross emissions carries a "Paris-aligned" label that exceeds the substantiated mechanics: the halo is the concern, not the absence of an SBTi badge	Claim-quality concern · Medium	"Paris-aligned" conveys rigour the mechanics do not support	Substantiate the alignment against a stated methodology, boundary and pathway, or describe the targets as informed by state and federal commitments without the Paris label

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-T-7	**Transition plan substance and dependency.** The Net Zero Roadmap is the transition plan: developed with internal and external experts, reviewed at least annually, with named levers, disclosed assumptions, and funding identified for the 2030 tranche. But the largest lever is **outside the entity's control** (grid decarbonisation, ~55%), the assumption acknowledges "potential for delays to renewable energy rollout at a grid level causing increases in Scope 2 emissions", ~~the abatement pathway for the growing Scope 1 process emissions is absent~~ **[corrected rev 2: levers *are* identified in Table 2, methane capture, biogas, renewable natural gas and methanol from biosolids, waste-to-energy, fleet electrification, but none is costed, dated or quantified for wastewater process emissions, and the only quantified direct-emissions line in Figure 1A is "fleet electrification −1,500" in the contingent 2030-35 tranche]**, opportunities are identified but "**not all… have been costed or included in current financial planning**", **the roadmap books a permanent net +3,000 t for a plant the same document says will run on 100% renewable electricity (E7d)**, and the roadmap document itself was not provided. [E8, E10, E29, E2] [S2-14, S2-15, T-11, T-01, T-DEP-04, DR-05]	Framework requires transition-plan disclosure where one exists (S7d) → **appears broadly compliant**; key assumptions and dependencies are disclosed	A resourced, reviewed plan with disclosed assumptions is real substance. But dependency dominates it: the majority lever is external and its delay risk is acknowledged without being quantified or given a fallback, and the growing part of Scope 1 has no lever but credits	Decision-usefulness concern · Medium-High	Delivery risk cannot be sized; the plan's controllable share is the minority	Quantify each dependency and its delay sensitivity, disclose fallbacks, publish the wastewater process-emissions pathway, and release the Roadmap
F-T-8 **(new, rev 2)**	**The roadmap books a permanent net emissions increase for an asset the same document twice says will be entirely renewable-powered.** Figure 1A shows "Belmont Desalination Plant **+6,500**" growth against a baseline stated as "Hunter Water's Scope 1 and 2 emissions using a **market-based** electricity calculation method", offset by only "Belmont Desalination Plant – renewable energy supply **−3,500**": leaving a permanent residual of about **+3,000 tCO_2-e**. CRFD p15: "The plant is required to operate on 100% renewable electricity." Appendix A assumption: the plant "is assumed to be powered by **100% renewable energy** per the NSW State Planning condition of consent, **from commissioning and proving phases, through to operation**". The residual is not explained anywhere. Separately, Appendix A dates first water to "**late 2027**" while the annual report's customer report card sets "First water by **June 2028**" and the CRFD body says commissioning is "on schedule for 2028". [E7d, E28, E8] [AI-07, E-06, T-09, S2-42, A-05, DR-02]	Not a compliance finding	Either the 100%-renewable planning condition does not fully apply, in which case the plant's Scope 2 is understated in the narrative and the condition is over-claimed, or the growth bar is overstated by roughly 3,000 t a year. Both bear on the 80%-by-2030 arithmetic. This also sharpens F-S2-7: two Belmont lines are booked against one another on a market-based base with no reconciliation	Decision-usefulness concern · Medium-High	The single largest growth item in the roadmap cannot be reconciled to the asset's own stated energy basis	Reconcile the +6,500 / −3,500 pair against the planning condition on one stated method; state one first-water date across the suite
F-T-9 **(new, rev 3)**	**The 2030 capacity target is already exceeded by delivered-plus-contracted capacity disclosed on the same page.** CRFD p25 sets "a target to achieve an absolute installed renewable energy capacity of **13 MW by 2030**", then reports in the two bullets beneath it that Phase 1 is "completed, delivering **6.4 MW** of behind-the-meter solar photovoltaic (PV) installations" and Phase 2 "has commenced, **with contracts awarded**… This phase includes **8.3 MW** of new renewable energy". 6.4 + 8.3 = **14.7 MW**, against a 13 MW target five years out. Table 4 rates the target "On track" at the 6.4 MW figure. [E16, E15, E34] [T-01, T-PROC-05, S2-14, A-16, AI-07]	Not a compliance finding: the target and the capacity are both disclosed	A target that contracted work has already overtaken measures nothing forward. Rated "On track" beside an emissions row rated "N/A", it reads as demonstrated progress toward a future goal when it is a report of work already committed. Compounds F-T-4: three of four target lines rated on track, none of them an emissions outcome	Decision-usefulness concern · Medium-High	The capacity target conveys ambition it does not carry, and no emissions outcome is attached to it	Reset the target above the delivered-plus-contracted position or retire it as an activity metric; publish the tCO_2-e effect expected from the installed and contracted capacity

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-T-10 **(new, rev 3)**	**The 2030 target is disclosed as a *net* target in the climate report and as an unqualified reduction target in the audited annual report.** CRFD p24: "Both our 2035 target and our interim 2030 target are **net** targets, meaning they include the use of carbon offsets to compensate for hard-to-abate or unavoidable Scope 1 emissions"; Table 4 fn ii: "4% of the 2030 target and 26% of the 2035 target will be met through **ACCUs** (tree planting projects)". The annual report states the same target three times with the word "net" absent from all three: p18 customer report card, "% reduction in carbon dioxide equivalent emissions compared to a 2020-21 baseline — **>80%**"; p34, "advance our goal to **reduce our greenhouse gas emissions by 80% by 2030**"; p56 target column, "**80% reduction by 2030**", footnoted (fn 3) as "80% reduction in operational greenhouse gas emissions (Scope 1 and 2) by 2030 compared to baseline". **A full-text search of the annual report returns no occurrence of "ACCU", "carbon credit" or "carbon offset"**: the credit leg of the target is absent from that document entirely. Only the 2035 endpoint carries "net", in the conventional phrase "net zero" (p56 fn 4). [E33, E6a, E9] [OUT-TB-05, OUT-TB-15, A-17, G-11, S2-40, E-20, DR-02]	Framework requires the entity to state whether a target is gross or net and the planned use of carbon credits (MT7) → **satisfied in the climate report; the annual report is outside TPG24-33**, so this is a claim-quality and cross-source finding rather than a framework breach	This materially qualifies D-007. The target wording *is* honest in the CRFD, and the honesty is not carried into the document a retail investor, a customer or the shareholder is most likely to read, or onto the customer report card the Community Committee will rate. In the annual report the commitment reads as an 80% cut in actual emissions; the **G** on p56 is graded against that version. The gross projection (76% by 2030) appears nowhere in the annual report either	Decision-usefulness → claim-quality concern · High	The credit dependence of the 2030 target is invisible to the annual report's readers, and the green status is awarded against the version without it	State "net" and the credit share wherever the 2030 target appears in the annual report and on the customer report card, and publish the projected gross reduction beside the net target

D.7 Governance, remuneration & assurance (Section 12)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-GOV-1	**No assurance over any emissions figure, beside three favourable reviews of the report.** CRFD p23 fn 6: figures "are based on internal calculations and **have not been independently verified by a third party**". CRFD p5 nonetheless describes, prominently and first: an external specialist-consultancy assessment of systems and capabilities; a DCCEEW-coordinated review by a sustainability consultancy giving "positive feedback on the fairness and connectivity of our disclosures"; and a legal advisory firm "concluding our 2024-25 CRFD is well prepared and comprehensive". None is named, none is published, none can be tested, and **none is assurance over the figures**. Internal audit was still only "planned for December 2025". The statutory audit (Audit Office of NSW) covers the financial statements only. [E4, E5, E30] [L-08, GOV-12, OUT-TB-04, OUT-RRB-05, OUT-EXT-07, E-22, A-05]	Framework does not mandate assurance in year one → **not a compliance finding**; recorded as a decision-usefulness and claim-quality concern	Assurance is credited only for the subject matter actually assured: here, nothing. Three favourable third-party opinions on page 5 against an unverified-figures footnote on page 23 inverts the prominence: a reader meets comfort before they meet the limitation, and the comfort covers a different thing	Decision-usefulness → claim-quality concern · High	Readers may assume the figures carry external verification	Obtain assurance over Scope 1 and 2 including the contractor data; state its scope and level beside the figures; describe at the front what the three reviews did and did not cover

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-GOV-2 **(materially recast, rev 2)**	~~**The same metric carries three performance statuses across the suite.** AR2025 **p34** corporate scorecard: greenhouse gas emissions – **R**… AR2025 **p56** sustainability scorecard: the same metric, **same 80% by 2030 target**, same 70,532 t result – **G**… CRFD Table 4: performance against target – **"N/A"** [third status].~~ **[WITHDRAWN as framed on source-fidelity review, 3 Aug 2026: this was the review's own stated load-bearing finding and it does not survive contact with the source.** Verified by raw *and* `-layout` re-extraction: **(a)** AR2025 p34's table has only **Measure** and **Status** columns and states **no target** (E6); greenhouse gas emissions is not a row in the p16 Corporate Scorecard's Actual/Target/Status table at all (E6-a2). **(b)** The reconciliation is the **next sentence on the same page**: "…This represents a 13% reduction in emissions. **While short of our annual target, we are on track to meet our 2030 commitment. More detail can be found on page 56**" (E6-a3). **(c)** p56 states its target expressly as "80% reduction by 2030". So the R is against an annual target and the G against the 2030 target, the annual report says so, and it walks the reader from one to the other: the OUT-STK-05 co-located-correction limb is **satisfied**. **(d)** CRFD Table 4 records "-13%" as reporting-period performance and "N/A" only under *Performance against target*, footnoted to the location-versus-market-based basis, an explicit statement of non-assessability, not a third contradictory status.] **THE CORRECTED FINDING, on the same evidence: the published statuses cannot be tested. (i)** The annual target the **R** is measured against is **quantified nowhere in the reporting suite**: not on p34, not on p16, not in the CRFD: so no reader, director or regulator can verify the red or size the miss. **(ii)** AR p56 grades the 80%-by-2030 target **G** on a **location-based** result while the same page's footnote 3 states the target "is based on the market-based greenhouse gas emissions calculation methodology": which is precisely the ground on which the CRFD declines to assess it. **The AR's G and the CRFD's "N/A" are about the same target and cannot both be right. (iii)** The p34 narrative asserts "we are on track to meet our 2030 commitment" in a year total emissions **rose 1.8%**: an increase stated nowhere and only derivable by subtracting two table columns. [E6, E6-a2, E6-a3, E6a, E6b, E6c, E1a] [AI-07, DR-02, S2-41, OUT-TB-02, OUT-TB-03, A-19, GOV-12]	Framework requires disclosure of performance against each target and an analysis of trends (MT8) → **potential compliance concern survives, on narrower grounds**: a status is published against an undisclosed target, the same target is graded two incompatible ways across the suite, and the current-year trend is not analysed	Still the load-bearing performance-claim finding, but **not** on a red-versus-green contradiction. The failure is testability: a reader can follow the red to the green and still cannot check either. Limb (iii), an "on track" assertion in a year of increase, with the increase unstated, is untouched by the correction and now carries the most weight	Decision-usefulness → potential compliance concern · High **(confidence in the corrected framing: High; the withdrawn framing was High-confidence and wrong, which is recorded in Annex L)**	The published performance position cannot be verified by any audience against any stated target	Publish the annual emissions target and the result against it; grade the 80%-by-2030 target on one stated method in both documents; state the year-on-year movement
F-GOV-3	**Half the footprint rests on an unverified contractor report.** Wastewater CH_4/N_2O and treatment-plant electricity are sourced to "Veolia emissions report": 12,024 t Scope 1 + 23,361 t Scope 2 = 35,385 t, about 50% of the total. Veolia reports these to NGER in its own right; Hunter Water states the reports "provided to Hunter Water for the sub-contracted sites [are] aligned with the NGER (Measurement) Determination 2008", but **no verification Hunter Water performs over them is described**, the report was not provided, and Veolia Holdings Australia's group NGER row (945,868 t Scope 1) is not attributable to Hunter Water's plants. [E3a, E26, E4] [GOV-12, G-12, S2-05, A-01C, A-05, DR-02]	Not a compliance finding: the method source is disclosed	The boundary decision to include these emissions is a genuine positive (F-INV-4); the data underneath it is the weakest link in the inventory. Half the footprint is unassured *and* third-party-sourced, with no described control	Cannot verify: material evidence missing · Medium-High	The larger half of the footprint cannot be independently relied on	Publish the facility-level contractor figures, describe the verification performed, and bring the contractor data inside the assurance scope

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-GOV-4	**Governance architecture is complete and coherent.** Board accountability with five committees carrying named climate roles (Sustainability, Audit & Risk, Investment, People & Culture, Nominations & Governance), each meeting at least quarterly; an Executive Sustainability Standards Steering Committee established 2024; a Group Manager Climate and Sustainability leading the Climate Program; climate integrated into the ERM framework by Board decision in May 2024 with a new "climate transition" strategic risk; climate screening embedded in the Asset Creation Framework for all capital works; annual climate update to the Board. Charter changes on 1 July 2025 are correctly flagged as post-period. [E27] [GOV-01, S2-07..13, S2-47, A-16]	No apparent issue	**Baseline (not credited)**: this is the governance a credible discloser is expected to have, and it is well described. Note the disconnect: the same governance chain oversaw a reporting suite that publishes a status against a target it never states, grades one target two incompatible ways across its two documents *(rev 2, the earlier "three different statuses for one metric" formulation is withdrawn; see D-029)*, and describes the 2030 target as net in one document and not in the other *(rev 3, F-T-10)*	No apparent issue: baseline · High	—	Maintain; add a control that reconciles metric statuses across the annual report and the climate report before publication
F-GOV-5	**No climate-linked remuneration is disclosed.** No evidence of executive incentives tied to emissions metrics appears in the reviewed documents. [AR2025; CRFD] [GOV-08, A-11, T-PROC-05]	No apparent issue	No remuneration escalation chain arises, so the metric weaknesses at F-S2-1 and F-GOV-2 do not flow into pay. Recorded as not applicable rather than as a positive or a gap	Not applicable · Medium	No pay-linkage escalation	If climate metrics are later linked to remuneration, disclose the metric boundary, gross/net basis and assurance status

D.8 Sector module & new-module findings (Section 13)

Not applicable, general sector, no specialised module triggered. Hunter Water is a regulated water and wastewater utility, not a financial institution, miner, airline, retailer or property group, so no FI/PCAF, SEC-FI-TGT-04, SEC-FI-05A, SEC-SF, SEC-INV-LT, mining, aviation, retail or property module applies. Water-utility-specific observations, wastewater process CH_4/N_2O as the dominant and hardest-to-abate Scope 1 source; electricity for pumping and treatment as the dominant Scope 2 source; biosolids as an uncounted Scope 3 source named as an opportunity; capital-works embodied carbon in a major build programme; and rainfall dependence as the defining physical risk: are captured as decision-usefulness observations in D.2, D.3, D.4 and D.9, **not** applied as invented rules (AI-01).

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-SEC-1	General sector; no specialised module applies. A candidate water-utility module is recorded as a rule-development item (Annex N) rather than applied.	N/A	N/A	N/A · High	—	—

Financed-emissions target headroom & benchmark (SEC-FI-TGT-04): *N/A if not an FI.*

SECTOR TARGET	LATEST REPORTED	TARGET VALUE	% CHANGE PERMITTED	FLAT-LINE BENCHMARK	FOSSIL-FUEL OVERRIDE?	RULING
N/A: not a financial institution	N/A	N/A	N/A	N/A	N/A	N/A

D.9 Nature & physical risk (Section 14)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
F-NAT-1	**Physical-risk coverage is relevant, specific and the strongest part of this disclosure.** Risks are typed (acute/chronic physical; transition) and horizoned (0–5 / 5–25 / 25–60+ years, tied to the IPART price determination, Operating Licence and asset lives). Concentration risk is stated plainly: "**over 80% of drinking water is sourced from the Williams River catchment**". An asset-level climate vulnerability assessment was completed in the period and reported to the Board Investment Committee, feeding the State of the Assets Report; NARCLiM 1.5 projections sit in the water source models with work underway on NARCLiM 2.0; vulnerable assets were entered into the NSW DCCEEW Climate Risk to Assets Dashboard pilot. Flood/sea-level/storm, heatwave/bushfire and drought exposures are each tied to asset classes. [E22] [N-01, N-02, S2-02, DR-06]	No apparent issue	Assessed for **relevance to the business model and methodology transparency (N-04)**: the review does not judge the scientific quality of the modelling and says so. On that test the coverage is appropriate for a rainfall-dependent, asset-dispersed utility, and the concentration disclosure is genuinely useful. It stops at qualitative: no quantified financial effect (F-AP-3), one scenario only (F-NAT-2)	No apparent issue on relevance; decision-usefulness on quantification · High	Exposure is legible but not sizeable	Complete the dashboard pilot and publish quantified exposure by asset class linked to resilience capex
F-NAT-2	**A single high-emissions scenario, applied qualitatively.** Risks were assessed across the three horizons "using a **high emissions scenario (RCP 8.5)** as the basis for this analysis", with qualitative consequence and likelihood matrices. No lower-emissions or orderly-transition pathway is applied, even though transition risk is one of the two risk types identified and includes policy, technology, market and reputational exposure. The report states quantitative scenario analysis is future work. [E23] [S2-02, S2-05, N-01, DR-05]	Framework prioritises qualitative disclosure in year one → not a compliance finding	RCP 8.5 stresses physical risk but is the *least* stressing case for transition risk: carbon prices, technology shifts and policy tightening bite hardest in a low-emissions world. So the transition risks identified have not been tested against the scenario that would make them material	Decision-usefulness concern · Medium	Transition-risk exposure is identified but untested	Add at least one low-emissions / orderly-transition scenario and test the transition risks against it
F-NAT-3	**A cross-source observation on storage headroom.** AR2025 p33 discloses that Grahamstown Dam's top water level was lowered to 12.0 m AHD (~90% capacity) in July 2024 and then to 11.5 m AHD (**~82% capacity**) in September 2024, with dam upgrades that "will take some time to be scoped, planned, approved and delivered". The driver is dam safety under earthquake loading: **not climate**: but the effect is materially reduced storage in the rainfall-dependent system whose top-rated physical risk is drought, and the CRFD's water-security risk assessment does not reference it. [E24a, E22] [DR-06, DR-02, S2-47, N-01]	Not a compliance finding	Recorded as a consistency observation, not an allegation: the two documents describe the same water-supply system and only one mentions a ~18% reduction in the primary storage's top level. A reader assessing drought resilience from the CRFD alone would not know	Decision-usefulness (minor) · Low-Medium	Drought-resilience assessment is incomplete from the climate report alone	Reference the reduced storage headroom and the upgrade timeline in the water-security risk assessment, distinguishing the dam-safety driver from climate
F-NAT-4	**No nature or biodiversity disclosure beyond opportunity framing.** Wetland restoration, blue carbon and nutrient offset schemes appear in the opportunities table; no nature materiality screen, biodiversity metric or TNFD work is claimed, and no water-quality or ecosystem emissions link is drawn. For a utility discharging to the Hunter River estuary through five treatment plants, this is a forward gap. [E29, E22] [N-02, N-03]	Not required by the framework	Acceptable for a first-year climate disclosure; noted as a forward gap rather than a current failing	Minor limitation · Low	Limited nature visibility	Consider a nature and water-quality materiality screen alongside the next Adaptation Plan review

Annex E: Cross-rule escalation chains (AI-06 / AI-23)

BASE ISSUE	CHAINS TO	RULE + EVIDENCE IDS	ESCALATED SEVERITY
~~Three performance statuses for one metric~~ **Untestable performance statuses (F-GOV-2, recast rev 2)**	→ the headline performance claim, for every audience: a **red** is published against an annual target quantified nowhere; a **green** grades the 80%-by-2030 target on a method that target is not set on, which is the same ground on which the climate report records "N/A"; and the "on track" assertion sits above the red in a year emissions rose 1.8%, an increase stated nowhere. Chains further to the framework's performance-against-target requirement (MT8)	AI-07 / DR-02 / S2-41 / OUT-TB-02 / A-19; E6, E6-a2, E6-a3, E6a, E6b, E6c, E1a	Decision-usefulness → **potential compliance concern**; load-bearing for four audiences. **The original "red-versus-green contradiction" limb is withdrawn: the correction is co-located and the targets differ**

BASE ISSUE	CHAINS TO	RULE + EVIDENCE IDS	ESCALATED SEVERITY
The 2030 target is net in one document and unqualified in the other (F-T-10, new rev 3)	→ the public and retail rows, since the credit leg of the target is absent from the document those audiences read; → the p56 **G**, which grades the version without credits; → the customer report card the Community Committee will rate (F-4), which carries the same unqualified form; → the cross-source matrix (O.1) and the regulator's DR-02 consistency limb; → **D-007**, whose "the target wording is honest" ruling is now document-specific	OUT-TB-05 / OUT-TB-15 / A-17 / G-11 / S2-40 / E-20 / DR-02; E33, E6a, E9, E31	Decision-usefulness → **claim-quality concern** · High
The "flat" Scope 2 is two offsetting movements (E35, new rev 3)	→ the onsite-solar attribution (F-S2-1), since the only Scope 2 the claimed driver can reach fell 2.5% while the contractor-operated half rose 3.1%; → the qualified solar positive (F-S2-5); → the contractor-data dependency (F-GOV-3), because the rising half is the half nobody has verified	A-19 / G-BAU / S2-25 / S2-26 / OUT-TB-07; E35, E1, E7	Decision-usefulness concern · High
A 2030 capacity target already exceeded by contracted work (F-T-9, new rev 3)	→ F-T-4, which already finds three of four target lines rated on track and none of them an emissions outcome; → the "On track" rating itself, which reports committed work as forward progress	T-01 / T-PROC-05 / S2-14 / AI-07; E34, E16, E15	Decision-usefulness concern · Medium-High
Onsite-generation series does not reconcile (F-S2-8, new rev 2)	→ the entity's own-action claim (F-S2-1) and the qualified solar positive (F-S2-5), both of which rest on a series containing a repeated year, a +141% movement reported as +25%, and a capacity step that does not add up; → the year-over-year module, since the break is invisible in every report that carries it	YOY-02 / YOY-04 / AI-07 / A-19 / S2-14; E7e, E15	Decision-usefulness concern · high confidence
Two incompatible NGER-exclusion rationales (E7c, new rev 2)	→ the boundary positive (F-INV-4): the decision stands, but the reason given moved from an incorrect Scope-3 characterisation to an operational-control one with no reconciliation; → the cross-source matrix (O.1)	DR-02 / AI-07 / YOY-05 / G-04; E3, E7c	Decision-usefulness concern
Belmont net +3,000 t against a 100%-renewable condition (F-T-8, new rev 2)	→ the 2030 pathway arithmetic and the growth bars (F-T-3); → the lever-overlap question (F-S2-7), since two Belmont lines are booked against one another on one market-based base; → the plant's own planning condition, which the report presents as securing renewable operation	AI-07 / E-06 / T-09 / S2-42 / A-05; E7d, E28, E8	Decision-usefulness concern
Grid decarbonisation is ~55% of the planned reduction (F-S2-1)	→ the current-year performance narrative, which attributes the reduction to onsite solar alone; → the "on track" claim (F-GOV-2); → the 2030 target's credibility, since the majority lever is outside the entity's control and its delay risk is acknowledged but unquantified (F-T-7)	A-19 / G-BAU / OUT-TB-07 / E-01 / T-MI-06 / AI-07; E7, E7a, E7b, E8, E8a	Decision-usefulness → **claim-quality concern**
Grid attribution disclosed FY24, dropped FY25 (F-S2-1)	→ year-over-year candour: the removal of a previously disclosed unfavourable driver, while the same report's appendix still states it	YOY-05 / SEC-SF-11 / A-19 / AI-07; E7, E7a, E7b	Decision-usefulness concern (quiet removal)
Base year stated as 2005 / 2020-21 / 2021-22 with three values (F-BASE-1)	→ the 13% progress figure and the 80%-by-2030 target, neither of which can be tied to a stable base; → the framework's base-period and measurement-change requirements; → the 2021-22 base period, for which **no inventory was ever published** (AR2022)	G-10 / T-BASE-01 / S2-39 / YOY-04 / AI-07; E19, E19a, E20b	Decision-usefulness → **potential compliance concern**
Scope 2 measured location-based, targeted market-based, market-based unreported (F-S2-2)	→ target progress: unmeasurable on the target's own basis this period, which is why Table 4 records "N/A" (F-GOV-2); → the certificate gap (F-S2-6), since a market-based target depends on certificate retention already flowing	E-01 / S2-28 / G-10 / T-MI-06 / GHG-STD-08; E12, E6b, E17	Decision-usefulness concern
Scope 1 up 31%, ~~unexplained~~ **undecomposed (F-INV-3, qualified rev 2)**	→ the 2035 endpoint: the growing component is the one the roadmap calls hard to abate, its levers are identified but none is costed, dated or quantified, and the only quantified answer to the shortfall is credits (F-OFF-2/3/4); → the gross trajectory, which rises 2030→2035 (F-T-3); → **newly, the fleet/plant/boiler pathway, since on the document's own source mapping the fastest-growing component is Hunter Water's own fossil-fuel combustion (HW-operated Scope 1 +35.6% on baseline) against a single uncosted "fleet electrification −1,500" in the contingent tranche**	G-06 / S2-25 / A-19 / T-07 / T-09; E2, E1a, E8, E9, E29	Decision-usefulness concern · high confidence
Net target with no gross target (F-AP-2a)	→ the abatement side of the pathway, which nothing constrains; → the credit leg, which can always close a net gap; → the framework requirement that a net target be accompanied by an associated gross target	S2-40 / T-10 / G-11; E9	**Potential compliance concern**
No permanence basis for the credits (F-AP-2b / F-OFF-3)	→ the durability of the 2035 endpoint; → the physical-risk disclosure, which identifies bushfire as material to assets in the same bushfire-prone zones where the plantings sit; → the framework requirement naming permanence expressly	E-10 / E-08 / A-05 / DR-05 / N-01; E11c, E22	Cannot verify → **potential compliance concern**
ACCU registration stated two ways; 45,000 vs 15,000 unreconciled (F-OFF-2)	→ 26% of the 2035 endpoint, which rests on an instrument whose registration status and volume the document itself does not settle	AI-07 / E-08 / E-19 / A-05 / DR-02; E11, E11a, E11b	**Cannot verify: serious concern** (strong target component on missing evidence)

BASE ISSUE	CHAINS TO	RULE + EVIDENCE IDS	ESCALATED SEVERITY
Credit supply ~6,400/yr vs ~20,500/yr required (F-OFF-4)	→ the 2035 endpoint, whose gap is filled by an undecided Terreel planting project contingent on willingness to pay (F-T-2)	E-08 / E-19 / T-11 / T-DEP-04 / A-05; E11b, E9, E10	Cannot verify → decision-usefulness concern
2035 endpoint unfunded, conditional on willingness to pay (F-T-2)	→ the target's status as a commitment; → the credit supply project (F-OFF-4); → adaptation investment beyond 2035, expressly "not yet quantified"	T-06 / T-11 / S2-15 / T-DEP-04; E10, E29	Decision-usefulness concern · high confidence
Endpoint deferred 2030 → 2035, undisclosed currently (F-T-5)	→ the credibility of the current commitment, which reads as consistently held; → the Paris-alignment claim (F-T-6), asserted on a target that was weakened	YOY-06 / T-05 / A-18 / S2-41; E20, E20a, E20b	Decision-usefulness concern
"100% renewable" includes the mandatory Renewable Power Percentage (F-S2-4)	→ the renewable-electricity claim's voluntary increment; → the market-based target, part of which is delivered by a statutory obligation rather than voluntary procurement	E-07 / E-09 / E-11 / E-21 / E-24 / S2-42; E14, E13	Decision-usefulness → **claim-quality concern**
Roadmap books grid decarbonisation and renewable contracts on an overlapping electricity base (F-S2-7)	→ the 2030 pathway's arithmetic, which cannot be validated on one method	E-01 / E-06 / E-15 / T-MI-06 / A-05; E8, E12	Cannot verify
No assurance, beside three favourable report reviews (F-GOV-1)	→ every emissions figure and the "on track" status; → half the footprint, which is contractor-sourced and equally unverified (F-GOV-3)	L-08 / GOV-12 / OUT-TB-04 / OUT-RRB-05 / E-22; E4, E5, E3a, E30	Decision-usefulness → claim-quality concern
Half the footprint from an unverified contractor report (F-GOV-3)	→ the boundary positive (F-INV-4), which is credited for the *decision* while the underlying *data* is cannot-verify; → the NGER reconciliation, where the contractor's group row is not attributable	GOV-12 / G-12 / A-01C / A-05; E3a, E26	Cannot verify: material evidence missing
Scope 3 unquantified with no bound (F-S3-1)	→ the carbon-accounting audience, capped at 1 under the confirmable-completeness test. **Does not chain to the headline claim**, because the target is expressly bounded to Scope 1+2 (F-S3-2): the A-17 ceiling here is set by the performance claim, not the target's scope	S2-29 / G-08 / S3-02 / S3A-01 / OUT-STK-13; E18	Decision-usefulness concern; caps one audience
Single RCP 8.5 scenario (F-NAT-2)	→ the transition risks identified in Table 1, which bite hardest in a low-emissions world and have not been tested against one	S2-02 / S2-05 / DR-05 / N-01; E23	Decision-usefulness concern
No material financial impact asserted, unquantified (F-AP-3)	→ the adaptation capital programme described in the same suite (40-year plan, desalination build, vulnerable assets identified), which the assertion is never reconciled against	L-11 / S2-33..37 / S2-47 / A-05; E24, E22, E28	Cannot verify: heightened scrutiny applied

Annex F: NoCO2 Net Zero Required Interventions, CAAM & Prohibited Activities screen (OUT-05)

SCREEN	OUTPUT	BASIS
Required Interventions Schedule	**Potentially applicable: evidence required**	A large asset-intensive utility with material fossil and high-GWP sources currently *growing*: wastewater process CH_4 and N_2O (the dominant Scope 1 source, up 31% since baseline), liquid fuel in fleet, plant and machinery, natural gas in a boiler, and SF_6-insulated switchgear and transformers. Grid electricity for pumping and treatment is the dominant Scope 2 source. Relevant categories are very likely to pass the materiality test. An asset and plant register is required to determine which interventions apply and on what timeframe.
Clean Alternative Assessment	**Potentially applicable**	Disclosed fossil-consuming plant: the vehicle fleet ("fleet electrification" appears as an undated roadmap line item at −1,500 t), plant and machinery running on liquid fuel, and a natural-gas boiler. No cease-new-acquisition or cease-all-use dates are disclosed for any of them, and the roadmap's own 2035 tranche is contingent. A structured clean-alternative assessment deriving cessation years is indicated.

SCREEN	OUTPUT	BASIS
Prohibited Activities Schedule	**Not apparently applicable**	No evidence of fossil-fuel expansion or material support for fossil-fuel expansion identified in the reviewed materials. A regulated water and wastewater monopoly. Recorded as a high-level screen only, not a full conformance assessment.

Annex G: Rule-application table

RULE FAMILY	APPLIED?	RESULT
Applicability gate (L / S2-01..06)	Yes	NSW State Owned Corporation; **not** a Ch 2M reporting entity, so no AASB S2 / RG 280 finding available. **Mandatory** TPG24-33 Phase 1 first year, strictest framework claim ("prepared in accordance with") tested strongly. Appears broadly compliant with two potential compliance concerns (L-01, L-02, L-13, A-06, A-07)
GHG inventory foundation (G / GHG-STD)	Yes	Method disclosed source by source (strength); factor values not disclosed; Table 3 arithmetic fully verified; **base year unstable across the suite**: 2005 / 2020-21 / 2021-22, three values, two methods (G-01, G-10, G-12, T-BASE-01, GHG-STD-01, GHG-STD-08, GHG-STD-11)
Scope 1 (G-06 / S2-26)	Yes	Complete and disaggregated by operator; SF_6 nil; **up 31% since baseline and undecomposed** *(rev 2: "unexplained" withdrawn, a generic population-growth driver is disclosed for the projected growth bar only)*, now 26% of the footprint; **the fastest-growing component on the document's own source mapping is the entity's own liquid-fuel and gas combustion, +35.6% on baseline** (G-06, S2-25, S2-27)
Scope 2 & renewables (E / S2-28)	Yes	Location-based disclosed; **market-based not reported** though targets are set and tracked on it; certificate register absent; "100% renewable" expressly includes the mandatory Renewable Power Percentage; behind-the-meter solar is a qualified positive (S2-28, E-01, E-02, E-03, E-06, E-07, E-14, E-15, E-16, E-23, E-24, T-MI-06)
Business-as-usual decomposition (A-19 / G-BAU)	Yes	**Load-bearing.** ~55% of the planned 2030 reduction is grid decarbonisation on the entity's own roadmap; the current-year narrative attributes the reduction to onsite solar alone: ~~contradicting its own appendix~~ **[rev 2: recast, the appendix names the onsite programme among five drivers, so the body *omits the primary driver* rather than contradicting the appendix; the appendix also covers 2020-21→2029-30 on a market-based basis]**: while the prior-year annual report had named grid decarbonisation and this one does not; the historical split is cannot-verify because consumption and factors are undisclosed. **Rev 3: the "flat" Scope 2 decomposes into −729 t on Hunter Water-operated sites (where the solar is) and +712 t on the contractor-operated half (E35)** (A-19, G-BAU, OUT-TB-07)
Headline-claim integrity (A-17)	Yes	The ceiling is set by the **performance** claim ("13% reduction… on track" in a year emissions rose 1.8%, with the rise stated nowhere and the annual target published nowhere), **not** by the target's scope, the target is honestly bounded to Scope 1+2. *(Rev 2: the "against a red status" limb is withdrawn, the red is against a different, unstated target and is reconciled in the adjoining sentence. The ceiling stands on the unstated increase and the untestable statuses.)* (A-17, OUT-TB-02, OUT-TB-03)
Scope 3 (S3 / S3A / G-15 / OUT-STK-13)	Yes	Not quantified for any category in any period; no bounding estimate; capital goods, purchased goods, grid losses and biosolids obviously material. Not a TPG24-33 breach in year one. **Caps the carbon-accounting audience at 1** under the confirmable-completeness test (S2-29, S2-30, G-08, G-15, S3-01, S3-02, S3-19, S3A-01, S3A-02, S3A-03, S3-EST, OUT-STK-13)
Offsets / net claims (E-08..22 / G-11)	Yes	Gross/net separated and credit shares quantified (baseline, not credited); registration status internally contradictory; 45,000 generated vs 15,000 available unreconciled; **no permanence basis** on plantings in a bushfire-prone setting the same report flags; supply ~6,400/yr vs ~20,500/yr required; self-generated and self-surrendered from a grant-funded project (G-11, E-08, E-09, E-10, E-19, E-20, E-21)
Targets & transition (T / S2-14/15/40)	Yes	Absolute, dated architecture (sound). 2035 endpoint **unfunded and conditional on willingness to pay**; gross emissions rise 2030→2035; **endpoint deferred 2030→2035 undisclosed currently**; Paris-alignment framework-halo; process/input metrics rated on-track while the emissions row is "N/A" (S2-14, S2-15, S2-38..42, T-01, T-05, T-06, T-07, T-09, T-10, T-11, T-14, T-PROC-05, T-SBTi-01/03, C-SBTi-02)
Governance / remuneration / assurance (GOV / A-11)	Yes	Governance architecture complete (baseline, not credited: **and the Asset Creation Framework climate gate was re-tested against A-16 in rev 2 and confirmed as baseline, D-036**); **no assurance over any figure** beside three favourable report reviews; ~~three performance statuses for one metric~~ **performance statuses that cannot be tested against any published target (rev 2, D-029)**; half the footprint from an unverified contractor report; no climate-linked remuneration disclosed. **Rev 2 credit side: an external Community Committee with a defined rating role over the emissions measure, constituted June 2025 (D-038)** (GOV-01, GOV-12, L-08, OUT-TB-04, OUT-RRB-05, E-22, A-16)
Sector (SEC-*)	No	General sector: regulated water utility; no specialised module exists. Water-utility observations captured in D.2/D.3/D.4/D.9; candidate module recorded as a development item (Annex N)
SEC-FI-TGT-04	No	Not a financial institution
SEC-FI-05A	No	Not a financial institution
SEC-SF / SEC-INV-LT	No	Not a super fund, asset owner or material investor. SEC-SF-11 applied only in its general form (prior-year reports are context, not current disclosure)

RULE FAMILY	APPLIED?	RESULT
NOCO2-MAP-01/02	Yes	Every material finding mapped in §6.1 with specific clause citations; promoted into §6.1
Nature / physical risk (N)	Yes	Physical-risk relevance and transparency assessed (N-04 scope stated: relevance and method transparency, not modelling accuracy). Strongest section of the disclosure; qualitative only, single RCP 8.5 scenario, no quantified financial effect; storage-headroom cross-source observation; nature/biodiversity a forward gap (N-01, N-02, N-03, N-04)
Disclosure risk & cross-source (DR-01..07 / A-01C)	Yes	NGER checked, **no match**, consistent with sitting below threshold on the entity's own statutory boundary (~35,100 t). Cross-source matrix built (Annex J.1): **eight boundary-normalised divergences after rev 3**: performance status (recast), base year, reduction driver (recast to a partial), PPA effect, ACCU registration, **the onsite-generation series**, **the NGER-exclusion rationale**, and **the net-versus-unqualified 2030 target (rev 3)**. Five risk lenses populated
Year-over-year (YOY-01..08)	Yes	Six annual reports plus the CRFD: module fully applicable. Series built (Annex K) across four disclosed periods, with 2021-22 recorded as never disclosed. Endpoint deferral, base-year migration, dropped grid attribution, dropped Scope 3 commitment and the FY25 reversal all recorded; rating derived from 2024-25 (A-01B)

Annex H: Evidence requests / cannot-verify items (AI-21 / A-05)

ID	ITEM	PACK	EVIDENCE REQUESTED	STATUS
H1	Electricity consumption and grid emission factors	Inventory	Annual electricity consumption (MWh) by site class and the NSW grid emission factor applied, for 2020-21 through 2024-25	Outstanding
H2	Market-based Scope 2	Renewable electricity	Market-based Scope 2 for the 2020-21 baseline and 2024-25, alongside location-based, with the residual-mix factor used	Outstanding
H3	Certificate register	Renewable electricity	LGC / REC register: creation, ownership, transfers, surrender or retirement, beneficiary and period; the quantum behind "renewable energy certificates received" in the FY24 and FY25 cash-flow statements; certificate treatment for each onsite solar system	Outstanding
H4	ACCU records	Offsets	CER project registration record; issuance history; current holding; reconciliation of the ~45,000 generated (2017–2024 audit) to the "up to 15,000 currently available"; any retirements to date	Outstanding
H5	Credit permanence	Offsets	Permanence period, reversal-risk buffer, carbon-maintenance obligations, and how bushfire exposure to the Chichester and Grahamstown planting sites is managed	Outstanding
H6	Credit supply plan	Offsets	Annual credit requirement against supply to 2035; the Terreel project's method, area, expected yield and decision date	Outstanding
H7	Assurance	Assurance	Any assurance engagement over Scope 1 / Scope 2, with subject matter, level, criteria and exclusions; the December 2025 internal audit terms of reference and outcome	Outstanding: none exists for the period
H8	The three external reviews	Assurance	Identity, scope statement and conclusion of the specialist consultancy, the DCCEEW-coordinated reviewer and the legal advisory firm, and an explicit statement of what each did **not** cover	Outstanding
H9	Contractor emissions data	Inventory	The facility-level Veolia emissions report for the period, and a description of the verification Hunter Water performs over it	Outstanding
H10	Basis of Preparation	Inventory	The Basis of Preparation document referenced at CRFD p5, including emission factor values per source and the basis for the base-year change	Outstanding
H11	Base-year reconciliation	Target progress	One stated base year with its value, method and boundary; a bridge from the 2005 baseline (82,097) to the 2020-21 baseline (81,026) and to the market-based 79,000; correction of the Table 4 "2021-22" reference; the 2021-22 inventory	Outstanding
H12 *(recast rev 2)*	Performance status reconciliation	Target progress	**The annual emissions target the p34 red status is measured against, with its value and the result against it**; and one method for grading the 80%-by-2030 target across AR p56 and CRFD Table 4, with the annual pathway the "on track" assertion rests on	Outstanding
H23 **(new, rev 2)**	Onsite-generation series	Renewable electricity	Restated onsite capacity and generation for 2020-21 through 2024-25 on one basis; the prior-year figure against which AR2024's "25% increase" was measured; reconciliation of 1.74 MW + 400 kW to the stated 2.96 MW	Outstanding

ID	ITEM	PACK	EVIDENCE REQUESTED	STATUS
H24 **(new, rev 2)**	Belmont energy basis	Target progress	Reconciliation of the Figure 1A "+6,500" growth bar and "−3,500" renewable-supply bar to the NSW planning condition of consent requiring 100% renewable operation from commissioning; and one first-water / commissioning date across the suite	Outstanding
H25 **(new, rev 2)**	NGER-exclusion rationale	Inventory	Confirmation of the operational-control basis for excluding the treatment plants, and correction or withdrawal of the AR2023-24 statement that NGER "categorise these emissions as Scope 3"	Outstanding
H26 **(new, rev 2)**	Scope 1 by source	Inventory	Scope 1 split by source (wastewater CH_4/N_2O, liquid fuel, natural gas, SF_6) rather than by operator, for each period, so the 35.6% growth in the Hunter Water-operated column can be attributed; plus the natural-gas boiler's fuel volume and replacement pathway	Outstanding
H27 **(new, rev 2)**	Renewable-electricity target tracking	Renewable electricity	The basis on which the "100% renewable electricity for large sites" target is rated "On track" in Table 4 while its reporting-period performance is "N/A" and footnote v states tracking begins next period	Outstanding
H13	Net Zero Roadmap	Target progress	The Roadmap document: lever costings, the annual trajectory, dependency sensitivities, and the funded-vs-contingent split between the 2025-30 determination and PP30	Outstanding
H14	Roadmap lever reconciliation	Target progress	Lever-by-lever reconciliation on one stated method, showing the electricity base each lever applies to, so grid decarbonisation and renewable contracts can be confirmed not to overlap	Outstanding
H15	Renewable Power Percentage split	Renewable electricity	The split of the "100% renewable by 2030" large-sites target between mandatory Renewable Power Percentage obligations and voluntary additional certificates	Outstanding
H16	Scope 1 increase	Inventory	Source-and-driver decomposition of the 31% Scope 1 increase (and the 17.3% single-year rise at Hunter Water-operated sites), separating load growth, process change, method change and factor change	Outstanding
H17	Scope 3 screening estimate	Scope 3	A category-level Scope 3 screening estimate with a total (spend-based acceptable), plus the material/non-material determination per category with reasons and a dated delivery plan	Outstanding
H18	Onsite solar performance	Renewable electricity	2024-25 generation (MWh), the self-consumed versus exported split, and the tCO_2-e avoided, per system	Outstanding
H19	Climate financial effects	Inventory / strategy	Quantified climate-related financial exposure by asset class from the DCCEEW Climate Risk to Assets Dashboard pilot, and the basis for the conclusion that material revaluations or impairments are unlikely	Outstanding
H20	Scenario analysis	Target progress	Scenario analysis on at least one low-emissions / orderly-transition pathway in addition to RCP 8.5, with the identified transition risks tested against it	Outstanding
H21	Adaptation Plan	Strategy	The Climate Change Adaptation Plan: actions, milestones, costings, and the outcome of the scheduled review	Outstanding
H22	AGL PPA effect reconciliation	Renewable electricity	Reconciliation of the AR2024 statement that the PPA would lower Scope 2 "by approximately 70% by 2030" with the roadmap's −10,500 t lever for the same agreement	Outstanding

Annex I: Evidence-chain & triggered-scan log (AI-10)

CHAIN ID	TRIGGER	FOLLOW-UP SCANS RUN	EVIDENCE IDS	FINAL LABEL
J1	**Net zero claim** (net zero Scope 1+2 by 2035)	target boundary, transition plan, S1/S2/S3, gross vs net, residual emissions, offsets, removals, assurance scope, prior claims, reader-burden caveats (10, 11, 03)	E9, E10, E8, E11, E11a, E11b, E11c, E18, E20, E20a, E20b	Target **honestly bounded** (D-007); endpoint unfunded and conditional; credit leg cannot-verify

CHAIN ID	TRIGGER	FOLLOW-UP SCANS RUN	EVIDENCE IDS	FINAL LABEL
J2	**Target achievement / on-track claim** ("13% reduction… on track")	boundary, baseline, current-year, progress calculation, gross/net, offsets, S3 coverage, method changes, restatements, assurance, remuneration links (11)	E6, E6-a2, E6-a3, E6a, E6b, E6c, E1, E1a, E19, E19a, E12, E4, E33	~~**Contradicted within the suite** (R / G / "N/A")~~ **Recast rev 2/3: not contradicted; *untestable*: a status against an unstated annual target, one target graded G in the AR and "N/A" in the CRFD, an "on track" claim in a year emissions rose 1.8% with the rise stated nowhere, and (rev 3) the target's net character and credit share absent from the annual report entirely.** Load-bearing; potential compliance concern
J3	**100% renewable electricity / market-based Scope 2**	location vs market-based, consumption, LGC/PPA evidence, ownership, retirement, timing, residual mix, sold certificates, wording (08)	E12, E13, E14, E15, E17, E7	Market-based unreported; certificate chain cannot-verify; **mandatory RPP counted inside the voluntary claim**
J4	**Scope 3 disclosed/omitted/selected**	category coverage, business-model-obvious categories, exclusions, data quality, spend vs supplier-specific, target boundary, consistency (09)	E18, E28, E29, E1	**Nothing quantified, no bound**: caps carbon-accounting audience (OUT-STK-13)
J5	**Assurance statement**	subject matter, level, assured metrics, exclusions, qualifications, S3 completeness, whether nearby claims imply broader assurance (12)	E4, E5, E30, E3a	**None exists**; three favourable *report* reviews create an assurance-halo
J6	**PCAF / financed / portfolio emissions**	—	—	Not triggered: not a financial institution
J7	**Transition plan / low-carbon opportunity**	actions, capital, dependencies, milestones, S3 coverage, scenario analysis, financial effects, delivery risk (11)	E8, E10, E29, E22, E23, E24	Real but dependency-dominated; majority lever external; opportunities uncosted
J8	**Methodology / boundary / factor / base-year / restatement change**	time-series comparability, baseline recalculation, target progress, real vs accounting movement, M&A, peer comparability (06, 11)	E19, E19a, E20b, E12, E1, E3	**Base year migrated 2005 → 2020-21 undisclosed**; three base periods, three values, two methods
J9	**"Paris-aligned" / "science-based" label**	exact validated wording, version, validation date, scope/baseline/exclusions, validated-vs-claimed gap, framework-halo (11, 03)	E21, E9, E18	Framework-halo claim-quality concern; validation expressly disclaimed
J10	**Coverage % claim**	—	—	Not triggered: no coverage percentage claimed
J11	**Target stated across multiple docs / multiple baselines**	reconcile baseline year, base-year value, coverage %, version; coverage-baseline vs reduction-baseline (11)	E19, E19a, E10, E1	**Unreconciled**: target-integrity concern (T-BASE-01)
J12	**Externally-dependent target** (grid, government policy, customer willingness to pay)	target-year vs dependency pathway, disclosed bridge, fallback actions (11)	E8, E10, E29	Dependency-heavy; grid delay risk acknowledged but unquantified; no fallback disclosed
J13	**Supplier-engagement / process metric**	engagement ≠ reduction; require measured trajectory; process not performance (09, 03)	E16	Installed capacity and self-assessed maturity rated on-track while the emissions row is "N/A"
J14	**Market-based headline reduction / target**	co-locate gross & location-based trend; decompose physical vs contractual instruments; chain to pay/finance (08)	E12, E7, E8, E6b	Target on an unreported method; no measurable progress position; no pay linkage (F-GOV-5)
J15	**Any reduction / target-progress claim: BAU decomposition (G-BAU / A-19)**	Scope 2 grid factor vs kWh consumption vs market instruments; disclosed split (06, 03)	E7, E7a, E7b, E8, E8a, E1a	**≈55% of the planned 2030 reduction is grid decarbonisation** (own roadmap); historical split cannot-verify (consumption and factors undisclosed)
J16	**Equity/debt/fund investments (inherited growth)**	—	—	Not triggered: no material investment portfolio
J17	**Australian entity / claim in more than one place (A-01C, DR-01..07)**	NGER register lookup; cross-source consistency matrix; boundary normalisation; legal/regulatory/technology/physical lenses (16, 01)	E26, E6, E6a, E6b, E19, E19a, E7, E7b, E11, E11a, E13, E24a	**No NGER match** (below threshold on own boundary); **eight boundary-normalised divergences after rev 3** (performance status recast, base year, reduction driver recast to partial, PPA effect, ACCU registration, onsite-generation series, NGER-exclusion rationale, and the net-versus-unqualified 2030 target) → §5 + Annex J

CHAIN ID	TRIGGER	FOLLOW-UP SCANS RUN	EVIDENCE IDS	FINAL LABEL
J18	**More than one period / report type available (YOY-01..08)**	multi-period series; real vs accounting; silent restatements and rebasing; dropped/added disclosures; target weakening; cross-report-type divergence; certification continuity (17, 06, 11)	E19, E19a, E20, E20a, E20b, E7b, E18, E1	Six periods analysed; **endpoint deferred 2030→2035**, base year migrated, grid attribution dropped, Scope 3 commitment dropped, 2021-22 never disclosed, FY25 reversal → Annex K / §3.4
J19	**Carbon neutral claim** (historical, 2019-20 aspiration)	gross emissions, boundary, exclusions, offsets and retirement, claim period, certification currency (E-25), residual emissions, assurance (10, 06)	E20, E20a	**No certification ever held**: an internal aspirational goal, replaced in 2021-22. Assessed neutral (A-18); no positive or negative credit for the replacement per se
J20	**Selected-boundary caveat**	headline wording, caveat prominence, reader burden, target coverage, assurance scope, omitted emissions (03, 09)	E10, E18, E6c	Target boundary caveat **prominent and honest**; the reader-burden failure is the *performance* status, not the boundary

Annex J: Cross-source consistency matrix & disclosure-risk register (DR-01..DR-07 / A-01C / OUT-TB-18)

O.1 Cross-source consistency matrix (DR-02). Values as stated; a divergence is flagged only after boundary and period normalisation, else cannot-verify (A-05). Hunter Water publishes two documents in the same reporting suite for the same period, the audited annual report and the TPG24-33 climate report, so the matrix is principally an internal-consistency test. It is not a listed entity and issues no CDP response, investor presentations or Climate Active PDS.

CLAIM / METRIC	ANNUAL / FINANCIAL REPORT	SUSTAINABILITY / ESG	MARKETING / WEBSITE	CLIMATE ACTIVE PDS	CDP	INVESTOR PRESENTATIONS	NGER / CER / SAFEGUARD	BOUNDARY/PERIOD NORMALISATION	DIVERGENCE?
Scope 1+2 total 2024-25	AR p34, p56: 70,532 tCO_2-e	CRFD Table 3: 70,532 (S1 18,516 + S2 LB 52,016)	—	N/A: no certification	—	N/A: not listed	**No register match**; own-boundary subtotal ≈35,100 t (reviewer calc) is below the 50 kt threshold	Wider-than-NGER boundary (includes contractor-operated plants), location-based, same period	**No**: consistent between documents; NGER absence explained by threshold (O.2)

CLAIM / METRIC	ANNUAL / FINANCIAL REPORT	SUSTAINABILITY / ESG	MARKETING / WEBSITE	CLIMATE ACTIVE PDS	CDP	INVESTOR PRESENTATIONS	NGER / CER / SAFEGUARD	BOUNDARY/PERIOD NORMALISATION	DIVERGENCE?
Emissions-target performance status	**AR p34 corporate scorecard: R** ("target has not been met"); AR p34 narrative: "on track to meet our 2030 commitment"; **AR p56 sustainability scorecard: G**	**CRFD Table 4: "N/A"**	—	N/A	—	N/A	Not a regulator metric	~~Same metric, same target (80% by 2030), same result, same period~~ **[withdrawn rev 2, the p34 R is against an *annual* target, not the 2030 target; p34 states no target and the sentence beneath it reconciles the two and cross-references p56].** What is genuinely comparable: **AR p56 G and CRFD "N/A" are both against the 80%-by-2030 target**: nothing to normalise there	**YES, on narrower grounds (F-GOV-2, recast rev 2): (i) the AR G and the CRFD "N/A" on the same 2030 target are incompatible: the AR grades a market-based target on a location-based result, which is the CRFD's stated reason for not grading it; (ii) the p34 R is published against an annual target quantified nowhere in the suite**
Target base year and value	**AR2022 p16: "compared to 2005 levels", no baseline value.** AR2023 p44/p47: **2005**, 82,097. AR2024 **p41** * (rev 3: previously cited p42)*: **2020-21**, 81,025. AR2025 p56: **2020-21**, 81,026	CRFD Table 3: **2020-21**, 81,026. CRFD Table 4: base period **2021-22**. CRFD Appendix A: **2020-21**, **79,000** (market-based)	—	N/A	—	N/A	—	Three base periods, three values, two methods (LB vs MB); AR2022 published no inventory for the 2021-22 period named as base	**YES: unreconciled across periods and within the current document (F-BASE-1)**

CLAIM / METRIC	ANNUAL / FINANCIAL REPORT	SUSTAINABILITY / ESG	MARKETING / WEBSITE	CLIMATE ACTIVE PDS	CDP	INVESTOR PRESENTATIONS	NGER / CER / SAFEGUARD	BOUNDARY/PERIOD NORMALISATION	DIVERGENCE?
Driver of the reduction	AR2024 **p41** *(rev 3: previously cited p42)*: energy efficiency, Renewable Energy Program **and grid decarbonisation**. AR2025 p34: "13% reduction… on track" (no driver)	CRFD p25 (realised 2024-25, location-based): "driven by increased onsite solar generation". **CRFD Appendix A p29 (2020-21→2029-30, market-based): "primarily results from grid decarbonisation, the roll out of Hunter Water Phase 1 and 2 Onsite Renewable Energy Program, the AGL renewable PPA for large sites and the Belmont Desalination Plant and energy efficiency and process optimisation initiatives"**	—	N/A	—	N/A	—	~~Same reduction, same periods, no boundary difference~~ **[WITHDRAWN rev 2: the two statements cover different periods (realised 2024-25 vs the pathway to 2029-30) and different methods (location- vs market-based), and neither difference is stated to the reader]**	**PARTLY (recast rev 2): not a flat body-versus-appendix contradiction: the appendix names the onsite programme second among five drivers. What survives: the body names only that second driver and omits the one the appendix calls primary, the period and method difference is never disclosed, and the grid attribution given in FY24 was dropped in FY25 (F-S2-1)**
AGL PPA effect	AR2024 p15: "expected to lower our… Scope 2 emissions by approximately **70% by 2030**"	CRFD Appendix A: AGL contract lever **−10,500 t** (≈20% of current Scope 2); grid decarbonisation booked separately at −43,000	AR2025 p34: "will progressively transition… to 100% renewable energy by 2030"	N/A	—	N/A	—	May measure different things (the agreement's own effect vs total Scope 2 reduction): **the report does not say**	**Cannot verify (A-05): unreconciled, not asserted as divergence (F-S2-3)**
ACCU project registration	—	**CRFD p24: "The project was registered with the Clean Energy Regulator"** vs **CRFD Appendix A: "is currently working with the Clean Energy Regulator to register ACCUs"**	—	N/A	—	N/A	Clean Energy Regulator is the registering authority; no evidence provided	Same project, same document: nothing to normalise	**YES: contradictory within one document, on 26% of the 2035 endpoint (F-OFF-2)**
ACCU volume	—	CRFD Appendix A: "approximately **45,000 ACCUs were generated**" (1 Jul 2017 – 30 Jun 2024 audit) vs "up to **15,000**… currently available"	—	N/A	—	N/A	No issuance record provided	"Generated" ≠ "issued" ≠ "available"; the ~30,000 gap is not explained	**Cannot verify (A-05): unreconciled (F-OFF-2)**

CLAIM / METRIC	ANNUAL / FINANCIAL REPORT	SUSTAINABILITY / ESG	MARKETING / WEBSITE	CLIMATE ACTIVE PDS	CDP	INVESTOR PRESENTATIONS	NGER / CER / SAFEGUARD	BOUNDARY/PERIOD NORMALISATION	DIVERGENCE?
Scope 2 method	AR p56 fn 2: progress location-based; fn 3: target "based on the market-based... methodology... reported using the market-based method from 2025-26"	CRFD Table 4 fn ii/iii; p24 fn 7: same	—	N/A	—	N/A	NGER uses location-based	Consistent *statement* across documents; the *figure* on the target's own method does not exist for any period	**No divergence in statement; material gap in substance** (F-S2-2)
Assurance status	AR: statutory audit of financial statements only (Audit Office of NSW); scorecards outside that perimeter	**CRFD p5**: three favourable external reviews of the disclosure. **CRFD p23 fn 6**: figures "have not been independently verified by a third party"	—	N/A	—	N/A	—	The reviews are of the report; the footnote is about the figures: technically different subjects	**No literal divergence; prominence inverted** so the impression diverges from the position (F-GOV-1)
Water-supply storage headroom	AR2025 p33: Grahamstown Dam top water level lowered to ~90% then **~82% capacity** (dam safety / earthquake)	CRFD p12, Table 1: water security risk; ">80% of drinking water from the Williams River catchment"; **no reference to reduced storage**	—	N/A	—	N/A	—	Different drivers (dam safety vs climate) but the same physical system and the same resilience question	**Observation, low-medium confidence**: not a climate-impact divergence; the omission limits the drought-resilience read (F-NAT-3)
Scope 3	AR2024 p42: "building out Scope 3 emissions data". AR2025: **no mention of Scope 3 anywhere**	CRFD Figure 2: "Scope 3 Emissions Roadmap" box, no figure	—	N/A	—	N/A	NGER covers no Scope 3	Never quantified in any period or document	**No cross-source divergence**: consistently absent; the FY24 commitment was not carried forward (F-S3-1, P.3)
Net character of the 2030 target (added rev 3)	**AR2025 p18, p34, p56 + fn 3: the target is stated three times as an unqualified "80% reduction" with the word "net" absent; "ACCU", "carbon credit" and "carbon offset" do not appear anywhere in the annual report**	**CRFD p24: "Both our 2035 target and our interim 2030 target are net targets, meaning they include the use of carbon offsets"; Table 4 fn ii: "4% of the 2030 target and 26% of the 2035 target will be met through ACCUs"**	AR p18 customer report card carries the same unqualified ">80%" form	N/A	—	N/A	Not a regulator metric; NGER has no target concept	Same target, same period, same entity, same two-document suite: **nothing to normalise**	**YES: the same target is net in one document and unqualified in the other (F-T-10). The p56 G is awarded against the version with no credits in it, and the projected gross reduction (76% by 2030) appears nowhere in the annual report**

O.2 NGER statutory reconciliation (A-01C): NGER FY2024-25 register, data as at 27 February 2026; operational control, Australian facilities, Scope 1 + location-based Scope 2, no Scope 3. **Hunter Water Corporation returns no match: it is not a registered NGER controlling corporation for the period.** That is consistent with sitting below threshold *on its own statutory boundary*: excluding the contractor-operated treatment plants (which the NGER operational-control test excludes and Veolia reports), Hunter Water's Scope 1 + location-based Scope 2 is approximately **35,100 tCO_2-e**: below the 50 kt corporate threshold. **Absence from the register is not zero emissions**, and it is not a divergence. It does, however, qualify the report's framing: the CRFD states the NGER Act is "the required framework for regulatory compliance applicable to Hunter Water" and cites it as the calculation basis throughout, which a reader may take to imply a regulator-verified submission that does not exist for this entity.

METRIC	DISCLOSED (REPORT)	NGER REGISTER (YEAR · AS-AT)	BOUNDARY DIFFERENCE (OP-CONTROL / AU-ONLY / METHOD / PERIOD)	RECONCILED?	LABEL
Scope 1	18,516 tCO_2-e (incl. 12,024 from contractor-operated plants)	**No match**: not a controlling corporation FY2024-25 (as at 27/02/2026)	Disclosure boundary is *wider* than NGER: it adds contractor-operated plants that fail the operational-control test. HW-only Scope 1 ≈ 6,492 t	Yes: reconciled by boundary and threshold; own-boundary total ≈35,100 t is below 50 kt	**No apparent divergence.** Absence ≠ zero (A-01C). Framing may over-imply regulator verification
Scope 2 (location-based)	52,016 tCO_2-e (incl. 23,361 from contractor-operated plants)	**No match** (as above)	As above; HW-only Scope 2 ≈ 28,655 t	Yes: same basis	**No apparent divergence**
Net energy (GJ)	**Not disclosed** in any period	**No match**	Energy is not reported in either document	No	**Cannot verify (A-05): no energy figure published to reconcile**
Contractor comparison (context)	Contractor-sourced portion ≈35,385 tCO_2-e (S1 12,024 + S2 23,361)	**VEOLIA HOLDINGS AUSTRALIA PTY LTD**: Scope 1 945,868 t; Scope 2 157,970 t; net energy 5,186,538 GJ	Group-wide Australian operations across all Veolia activities; Hunter Water's plants are an undisclosed fraction	No	**Cannot verify (A-05): the group row is not attributable; no facility-level breakdown provided (F-GOV-3)**

O.3 Disclosure-risk register (DR-01 / DR-03..DR-07): risk-labelled with confidence; every row cites its driver.

#	LENS	EXPOSURE & CONFIDENCE	DRIVER (FINDING / EVIDENCE IDS)	CROSS-SOURCE LINK (DR-02)	WHAT WOULD REDUCE IT
R-01	Legal (DR-03)	**Low-to-moderate** misleading-conduct / director-duty exposure · **Medium**	Not a Chapter 2M entity and no consumer marketing on climate grounds, so securities and consumer-law exposure is structurally narrow. What remains is accountable-officer exposure on the accuracy of a public statutory-suite disclosure: ~~the R / G / "N/A" contradiction~~ **[withdrawn rev 2: different targets, correction co-located] a red status published against an annual target quantified nowhere, and a green status on the 80%-by-2030 target that the companion climate report records as not yet assessable** (F-GOV-2; E6, E6-a2, E6a, E6b), an "on track" assertion in a year emissions rose 1.8% (F-GOV-2; E6c, E1a), a base year stated three ways with three values (F-BASE-1; E19, E19a), **and: newly: an onsite-generation series in the audited annual reports that reports a +141% movement as "a 25% increase" and a capacity step that does not add up (F-S2-8; E7e)**. The Board is described as providing continuous oversight of these disclosures (E27)	Performance-status and base-year rows	Publish one reconciled status; state year-on-year movement; publish one base year with value and method; disclose the 2030→2035 deferral
R-02	Regulatory (DR-04)	**Moderate** framework-conformance and economic-regulator exposure · **Medium**	Two substantive TPG24-33 gaps: a net target with no associated gross target, and no permanence basis for the credits (F-AP-2, F-OFF-3; E9, E11c). Performance against target is not analysed as MT8 contemplates (F-GOV-2). Pathway funding sits inside the IPART 2025-30 determination recovered through customer charges, so roadmap credibility is a price-regulation matter as well as a reporting one (F-T-2; E10). Clean Energy Regulator exposure attaches to the contradictory ACCU registration statement (F-OFF-2; E11, E11a)	ACCU registration row; base-year row	Set a gross target; disclose permanence and reversal basis; correct the registration statement; analyse the current-year trend; clarify that NGER is a calculation basis, not a verified submission
R-03	Technology (DR-05)	**Moderate-to-high** delivery and credibility exposure · **Medium-High**	The abatement side depends on the undecided or unbuilt: 8.3 MW contracted but unbuilt solar, the Belmont renewable supply, and a new Terreel planting project that is a future investment decision pending willingness to pay (F-OFF-4, F-T-2; E11b, E10). The growing part of Scope 1, wastewater process emissions, up 31%, has **no disclosed lever but credits** (F-INV-3; E2), and the report itself names "treatment options for fugitive emissions" a cost and implementation risk (E22). Gross emissions rise 2030→2035 (F-T-3; E9). The dominant lever, grid decarbonisation, is external with delay risk acknowledged but unquantified (F-S2-1, F-T-7; E8)	Reduction-driver row	Publish the wastewater process-emissions pathway; disclose the Terreel project's method, area, yield and decision date; publish credit requirement against supply; quantify grid-delay sensitivity and fallbacks

#	LENS	EXPOSURE & CONFIDENCE	DRIVER (FINDING / EVIDENCE IDS)	CROSS-SOURCE LINK (DR-02)	WHAT WOULD REDUCE IT
R-04	Physical (DR-06)	**Low-to-moderate** exposure · **Medium**	Physical-risk coverage is the strongest part of the disclosure: asset-level vulnerability assessment completed, NARCLiM in the supply models, the DCCEEW dashboard pilot underway, and the concentration risk (>80% from one catchment) stated plainly (F-NAT-1; E22). Exposure arises from consistency and quantification rather than coverage: a single RCP 8.5 scenario leaving transition risk untested (F-NAT-2; E23), no quantified financial effect and an unreconciled "impairments unlikely" conclusion (F-AP-3; E24), and the ~82%-capacity storage reduction disclosed in the annual report but not referenced in the climate report's water-security assessment (F-NAT-3; E24a)	Storage-headroom row	Quantify exposure by asset class from the dashboard pilot; add a low-emissions scenario; reconcile the no-material-impact conclusion with the adaptation programme; reference the storage headroom
R-05	Other: assurance and third-party data dependence (DR-07)	**Moderate-to-high** exposure · **High**	**No assurance over any emissions figure**, stated expressly (F-GOV-1; E4), while three favourable external reviews of the *report* are described first and more prominently (E5). About **half the footprint** rests on a contractor's emissions report that was not provided and is not independently verified, and the contractor's group NGER row is not attributable (F-GOV-3; E3a, E26). Internal audit was still only planned for December 2025. The audited perimeter does not reach the scorecards carrying the contradictory statuses (F-AP-4; E30)	Assurance-status row; contractor comparison row (O.2)	Obtain assurance over Scope 1 and 2 including contractor data; state scope and level beside the figures; describe what the three reviews did not cover; mark the audited perimeter
R-06	Other: claim-quality on renewable and alignment labels (DR-07)	**Moderate** exposure · **Medium**	"100% renewable energy by 2030" for large sites expressly includes mandatory Renewable Power Percentage obligations on the entity's own stated assumption, with the voluntary increment undisclosed (F-S2-4; E14). Targets are described as "aligned with the emissions reduction goals of the Paris Agreement" and "informed by science-based target-setting methodologies" on a Scope 1+2-only, credit-dependent target with rising gross emissions and expressly no validation (F-T-6; E21). Certificates are received and recognised in the accounts with no register or disposition disclosed (F-S2-6; E17)	AGL PPA row; Scope 2 method row	Disclose the mandatory-vs-voluntary split; substantiate or retire the Paris-alignment label; publish a certificate register with retirement evidence

Annex K: Longitudinal series & cross-period tracking register (YOY-01..08 / OUT-TB-19)

Six reporting periods and two report types are available, annual reports for 2019-20 through 2024-25, plus the inaugural 2024-25 climate report, so the module applies in full. Prior-year reports are **context, not current disclosure**; the 2024-25 rating is derived from the current period on the audited-source hierarchy (A-01B / SEC-SF-11), and continuity earns no credit (A-16). Where a like-for-like figure is not reconstructable it is recorded cannot-verify (A-05), not asserted as a change. Two periods are the minimum for a change observation and three for a trend; four disclosed periods of Scope 1 and Scope 2 data support trend statements, while **2021-22 was never disclosed** and is recorded as absent rather than inferred.

P.1 Multi-period headline series (YOY-02): value as stated, with the source it came from, per period.

METRIC / CLAIM	PERIOD →	2020-21	2021-22	2022-23	2023-24	2024-25	SOURCE(S) PER CELL	BOUNDARY/METHOD NORMALISATION
Scope 1		14,135	**Not disclosed**	16,395	17,270	**18,516**	CRFD Table 3 (2020-21, 2023-24, 2024-25); AR2023 p47 (2022-23); AR2022 (none)	Same boundary throughout (incl. contractor-operated plants); NGER Method 1. **Up 31% across the series**
Scope 2 (location)		66,891	**Not disclosed**	56,378	52,033	**52,016**	CRFD Table 3; AR2023 p47	Location-based throughout. Down 22% across the series; **essentially flat 2023-24 → 2024-25 (−17 t)**
Scope 2 (market)		**Not reported**	**Not reported**	**Not reported**	**Not reported**	**Not reported**	CRFD Table 4 fn ii/iii; AR2025 p56 fn 3	The basis the targets are set and tracked on; reporting begins 2025-26. **Un-trackable**
Scope 3 by category		Not quantified	Not quantified	Not quantified	Not quantified	Not quantified	CRFD Figure 2; AR2024 p42; whole suite	Never published in any period or document. **Un-trackable**
Total Scope 1+2		81,026 (baseline)	**Not disclosed**	72,773 (AR states 72,772)	69,303	**70,532**	CRFD Table 3; AR2023 p44/p47; AR2025 p34/p56	**Down 13% on baseline but UP 1.8% in the current period**: the reversal is stated nowhere

METRIC / CLAIM	PERIOD →	2020-21	2021-22	2022-23	2023-24	2024-25	SOURCE(S) PER CELL	BOUNDARY/METHOD NORMALISATION
Intensity metric		Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	whole suite	No intensity metric published in any period
Renewable electricity %		Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	whole suite	Capacity and generation reported instead of a share
Onsite renewable capacity / generation		3.0 MW project underway (AR2021)	1.74 MW / 1,685 MWh	**1.74 MW / 1,685 MWh: the identical figures AR2022 gave for the prior year, restated as this year's result**	2.96 MW / 4,054 MWh (80% self-consumed), reported as "a **25% increase** year on year": **+141% against the last disclosed year**; capacity step 1.74 + 0.40 = 2.14 ≠ 2.96	**6.4 MW / generation not disclosed**	AR2021 p29; AR2022 **p6**/p21; AR2023 **p44**; AR2024 **p40**; CRFD p25; AR2025 p34	~~Capacity comparable~~ **[rev 2: the series is NOT comparable: a repeated year, an unsupported growth rate and an unexplained 0.82 MW step (F-S2-8)]; 2024-25 generation absent in the year capacity doubled**
Offset / certificate volume		No surrender disclosed	No surrender disclosed	No surrender disclosed	No surrender disclosed	**No surrender disclosed**	CRFD p24, Appendix A	~45,000 ACCUs stated generated 2017–2024; "up to 15,000 currently available". ~~**none surrendered to date**~~ **[qualified rev 2: no source statement says none has been surrendered. This is a reviewer inference from "we plan to surrender..." and "from 2029-30 onwards" plus the absence of any retirement record: read as "no surrender disclosed", not as a positive nil]**
Base year as stated		—	**2005** (AR2022 p16: "80 per cent net reduction by 2030 compared to 2005 levels"; **no baseline value published**)	**2005 (82,097)**	**2020-21 (81,025)**	**2020-21 (81,026)** / Table 4 **2021-22** / Appendix A **79,000 MB**	**AR2022 p16**; AR2023 p44/p47; AR2024 **p41**; AR2025 p56; CRFD Tables 3 & 4, Appendix A	**Three base periods, three values, two methods.** Migration undisclosed. **Rev 2: the 2005 base was in force from 2021-22, one period earlier than first recorded**
Carbon-neutral / net-zero claim		"net zero emissions by **2035**"	"net zero emissions by **2035**" + 80% by 2030	net zero 2035 (vs 2005)	net zero 2035 (vs 2020-21)	net zero Scope 1+2 2035, conditional on willingness to pay	AR2020 **pp.13/23** ("carbon neutral by 2030"); AR2021 p29; AR2022 **pp.6/10/16/21**; AR2023 p47; AR2024 p43; CRFD p24 *(rev 3: AR2020 and AR2022 page slips corrected here to match Annex A)*	**Endpoint deferred five years; scope narrowed; condition added.** No certification ever held

P.2 Silent restatement & baseline-rebasing log (YOY-04)

#	FIGURE / BASELINE	AS STATED IN REPORT OF THE PERIOD	AS RESTATED IN A LATER REPORT	DISCLOSED & LIKE-FOR-LIKE?	EFFECT ON AN ON-TRACK / PAY / FINANCING CLAIM	LABEL (CONCERN / ACCEPTABLE / CANNOT-VERIFY)
1	**Target base year**	AR2023 p44/p47: baseline **2005**, **82,097 tCO_2-e**; both targets "compared to **2005** levels"; 2022-23 progress reported as "11% reduction compared to 2005 levels"	AR2024 **p41** onward *(rev 3: previously cited p42)*: baseline **2020-21**, **81,025** (then 81,026); CRFD Table 3 the same	**No: no restatement note in any report.** The two baselines are numerically close (82,097 vs 81,026), so the headline percentage barely moves, but what the target *means* changes materially: a 2005 base implies fifteen years of prior abatement; a 2020-21 base does not	Changes the meaning of both the 80%-by-2030 and net-zero-2035 targets; the 2022-23 "11% vs 2005" figure is not reconcilable to the current series	**Decision-usefulness → potential compliance concern** (G-10, T-BASE-01, YOY-04)
2	**Base period within the current document**	—	CRFD Table 3 header: base year **2020-21**; CRFD Table 4 "Base period" column: **2021-22**	**No**: the same document states two base periods for the same target, and the 2021-22 period has **no published inventory** (AR2022 disclosed no figures)	The interim 80% target cannot be tied to a stated base-year value	**Decision-usefulness concern** (T-BASE-01)

#	FIGURE / BASELINE	AS STATED IN REPORT OF THE PERIOD	AS RESTATED IN A LATER REPORT	DISCLOSED & LIKE-FOR-LIKE?	EFFECT ON AN ON-TRACK / PAY / FINANCING CLAIM	LABEL (CONCERN / ACCEPTABLE / CANNOT-VERIFY)
3	**Baseline method and value**	—	CRFD Table 3: 81,026 **location-based**; CRFD Appendix A: 79,000 **market-based**, same 2020-21 period	Partly: Appendix A states its method; the two values are never bridged, and the target is set on the market-based figure while progress is reported against the location-based one	Progress reported against a baseline on a different method from the target	**Decision-usefulness concern** (G-10, E-01, GHG-STD-08)
4	2022-23 total	AR2023 p44 scorecard: **72,772**; AR2023 p47 components: 16,395 + 56,378 = **72,773**	Not republished in the CRFD series (which shows only base, prior and current periods)	1 tonne rounding: immaterial	None	**Acceptable** (recorded in figure-fidelity X-5)
5	2020-21 baseline value	AR2024 **p41**: **81,025**	AR2025 p56 and CRFD Table 3: **81,026**	1 tonne difference: immaterial	None	**Acceptable** (figure-fidelity X-6)

P.3 Dropped / added disclosure log (YOY-05)

#	ITEM (METRIC / CATEGORY / TARGET / CLAIM / LIMITATION)	PRESENT IN	ABSENT/ADDED IN	EXPLAINED?	LABEL
1	**Grid decarbonisation named as a driver of progress**	AR2024 **p41** *(rev 3: previously cited p42)*: "Progress is driven by… energy efficiency, the Renewable Energy Program **and the decarbonisation of the NSW electricity grid**"	**Dropped** in 2024-25: CRFD p25 attributes the reduction to "increased onsite solar generation" alone: while CRFD Appendix A still names grid decarbonisation **first** among the pathway's five drivers	**No**	**Decision-usefulness concern: quiet removal of a previously disclosed unfavourable driver ~~contradicted by the same document's appendix~~ [rev 2: recast: the appendix names five drivers including the onsite programme, over a different period and on a different method; the finding is the body's omission of the primary driver, not a flat contradiction] (YOY-05, A-19)**
2	**Commitment to build Scope 3 data**	AR2024 p42 listed "building out Scope 3 emissions data" among forward activities	AR2025: **no mention of Scope 3 anywhere.** CRFD retains a "Scope 3 Emissions Roadmap" box with no figure and no date	**No**	**Decision-usefulness concern: a forward commitment dropped from the annual report without an outcome (YOY-05)**
3	**A disaggregated inventory**	AR2021 and AR2023–AR2025 disclose Scope 1 and 2	**~~AR2022 discloses no emissions figures at all~~ [WITHDRAWN rev 2: AR2022 p16 states "Our operations emit around 80,000 tonnes of carbon dioxide a year". Corrected to:] AR2022 discloses only a whole-of-operations approximation and no Scope 1, Scope 2, boundary or method**: in the very year it launched the net-zero-2035 and 80%-by-2030 targets	**No**	**Decision-usefulness concern: a target set without a published inventory; the period is also the one Table 4 names as base (YOY-05, S2-38)**
8 **(added rev 2)**	**Comparable onsite-generation reporting**	AR2022 (1.74 MW / 1,685 MWh), AR2023 (the same two figures again), AR2024 (2.96 MW / 4,054 MWh, "a 25% increase")	**The series breaks rather than stops**: a repeated year, a growth rate its own denominator does not support (+141% reported as +25%), and a capacity step that does not add up (1.74 + 0.40 ≠ 2.96); then generation is dropped entirely in 2024-25	**No**	**Decision-usefulness concern: the evidence base for the entity's only own-action lever is not like-for-like in any year of the series (YOY-04, F-S2-8)**

#	ITEM (METRIC / CATEGORY / TARGET / CLAIM / LIMITATION)	PRESENT IN	ABSENT/ADDED IN	EXPLAINED?	LABEL
9 **(added rev 2)**	**The NGER-exclusion rationale**	AR2024 p43: the plants are excluded because "other reporting frameworks, like NGER, categorise these emissions as **Scope 3**"	**Replaced** in 2024-25 by an operational-control-test rationale (CRFD p23), with no acknowledgement that the earlier account was different, or that NGER has no Scope 3 category	**No**	**Decision-usefulness concern: a silent change of stated basis beneath the disclosure's headline positive (YOY-05, DR-02)**
4	Prior "carbon neutral by 2030" aspiration	AR2020 **PDF pp.13 and 23** (an aspirational goal, not a certification)	Absent from every report from AR2022 onward, including the current CRFD	**No**: the replacement is stated but the earlier goal is never reconciled or acknowledged	**Decision-usefulness concern: see P.4 #1. The exit itself is neutral (A-18); the *undisclosed* replacement is the finding**
5	Onsite renewable generation (MWh)	AR2022 (1,685), AR2023 (1,685), AR2024 (4,054, with self-consumed/exported split)	**Absent in 2024-25**: only capacity (6.4 MW) is reported, in the year capacity roughly doubled and Scope 2 moved 17 t	**No**	**Decision-usefulness concern: the metric that would evidence the claimed solar-driven reduction is the one that stopped being published (YOY-05, A-19)**
6	Full four-pillar climate disclosure, requirements index, roadmap appendix, governance detail, risk register summary	**Added** in 2024-25 (the inaugural CRFD)	Present	Yes: mandated by TPG24-33	**Newly added**: credited only on its own current-year evidence, never as continuity (A-16). Materially expands what is disclosed
7	Asset-level climate vulnerability assessment; DCCEEW dashboard pilot participation; a defined "climate transition" strategic risk	**Added** 2024-25 (vulnerability assessment conducted in-period; risk defined via the May 2024 ERM integration)	Present	Yes	**Newly added**: assessed on current evidence (F-NAT-1); genuine expansion of the risk layer

P.4 Target-trajectory log (YOY-06 / YOY-08)

#	TARGET / CLAIM	BASE YR	TARGET YR	COVERAGE / SCOPE	CHANGE ACROSS PERIODS (WEAKENED / EXTENDED / REBASED / RE-SCOPED / RETIRED / REPLACED)	ON-TRACK SURVIVES SERIES?	LABEL
1	Carbon neutral / net zero endpoint	none stated (2019-20); then 2005; then 2020-21	**2030 → 2035**	"carbon neutral" (unbounded) → "net zero emissions" → "net zero **Scope 1 and 2**"	**Weakened and re-scoped.** AR2020: aspirational "carbon neutral by 2030". AR2021: "net zero emissions by 2030". AR2022 onward: net zero **2035** with an 80%-by-2030 interim. A willingness-to-pay condition was added and is now stated throughout. **Neither the five-year deferral nor the re-scoping is reconciled in the current disclosure**	**No**: the current "on track" claim ~~is contradicted within the suite~~ **[rev 2: recast, see P.5 #1: the two annual-report statuses are against different targets]** cannot be tested against any published annual target, is made in a year emissions rose 1.8%, and the endpoint is unfunded and conditional	**Decision-usefulness concern (YOY-06, T-05, A-18, S2-41)**
2	80% net reduction, Scope 1+2	**2005 (from 2021-22) → 2020-21 → (Table 4) 2021-22**	2030	Scope 1+2, absolute, **net** (incl. ACCUs), market-based basis	**Rebased** from 2005 to 2020-21 with no restatement note (P.2 #1), and stated as 2021-22 in the current target table (P.2 #2). **Rev 2: the 2005 base was in force from the 2021-22 annual report, not from 2022-23.** Coverage and gross/net treatment stable; the **measurement method changes** from location- to market-based tracking from 2025-26	**Assessed two incompatible ways**: CRFD Table 4 records performance against this target as "N/A" because its own method is unreported, while AR p56 rates the same target **G** on a location-based result. ~~the AR rates the same metric R and G~~ **[withdrawn rev 2: the p34 R is against an annual target, not this one]**	**Decision-usefulness → potential compliance concern (T-BASE-01, G-10, S2-41)**

#	TARGET / CLAIM	BASE YR	TARGET YR	COVERAGE / SCOPE	CHANGE ACROSS PERIODS (WEAKENED / EXTENDED / REBASED / RE-SCOPED / RETIRED / REPLACED)	ON-TRACK SURVIVES SERIES?	LABEL
3	Net zero Scope 1+2	2020-21	2035	Scope 1+2, **net**: 26% delivered by ACCUs; projected gross reduction 74%	Endpoint deferred from 2030 (P.4 #1). Gross reduction **deteriorates** from 76% (2030) to 74% (2035) on population growth. Funding **not** secured: requires PP30 decisions "pending customer willingness to pay"	**No**: unfunded, conditional, credit-dependent, and the credit supply is ~6,400/yr against ~20,500/yr required	**Decision-usefulness concern (T-06, T-11, T-DEP-04, E-08)**
4	Installed renewable capacity 13 MW	N/A	2030	Onsite capacity (MW): an **input** metric	Stable. Progress 1.74 MW (2021-22) → 2.96 MW (2023-24) → 6.4 MW (2024-25), plus 8.3 MW contracted	Rated "On track", and capacity-wise it is. But **capacity is not an emissions outcome**, and the emissions effect is unpublished in the year capacity doubled	**Qualified**: real physical progress; process/input metric presented as performance (T-PROC-05)
5	100% renewable electricity, large sites	N/A	2030	Large sites only (>100 MWh/yr), via **contractual instruments**	**Newly disclosed** as a target in the 2024-25 CRFD; the AGL PPA commenced 1 January 2025 scaling 20% → 100% of LGCs. AR2024 had sized the PPA's effect at ≈70% of Scope 2 by 2030; the roadmap sizes the lever at −10,500 t	Rated "**On track**" with reporting-period performance "**N/A**": and footnote v states that "tracking progress towards our renewable energy target from contractual instruments **will begin in the next reporting period**". **A status is therefore asserted for a target the same table says is not yet being tracked.** *(Rev 2: this line was recorded here but omitted from F-T-4 and §4.2 #10 in the first pass; both are now corrected, Table 4 has four target lines and three "On track".)*	**Decision-usefulness concern: the target expressly includes mandatory Renewable Power Percentage obligations (F-S2-4), and its "On track" status has no measurement behind it (F-T-4)**
6	Climate risk maturity "Embedded" (level 4)	N/A	2030	Qualitative maturity level, **self-assessed**	**Newly disclosed** in the 2024-25 CRFD. Current level "Systematic" (level 3), the level the NSW guide recommends for all NSW entities	Rated "On track". Assessment is a hybrid of internal self-assessment and third-party input the report concedes "is not a fully independent process"; independent assessment only "likely" before 2030	**Qualified**: process metric, self-assessed (T-PROC-05, GOV-12)
7	Gross Scope 1+2 reduction target	—	—	—	**None has ever been set.** "Hunter Water does not have a formal gross GHG emission reduction target"; projections (76% / 74%) are offered instead and are contingent on undecided investment	N/A	**Potential compliance concern: the framework requires an associated gross target where a net target is disclosed (F-AP-2)**

P.5 Cross-report-type consistency over time (YOY-07 / DR-02): *does divergence between report types appear, widen or resolve across periods?*

#	CLAIM / METRIC	REPORT TYPES COMPARED	PER-PERIOD DIVERGENCE (AFTER NORMALISATION)	TREND IN DIVERGENCE	AUDITED-SOURCE PREFERENCE APPLIED (A-01B)	LABEL
1	Emissions-target performance status	Annual report (two tables) vs climate report	**2024-25 only** (first year both exist): AR p34 **R** *(against an annual target, no target stated on the page)*; AR p56 **G** * (against "80% reduction by 2030", graded on a location-based result)*; CRFD Table 4 **"-13%"** with performance against the same 2030 target **"N/A"** *(footnoted to the location-vs-market-based basis)*	**New divergence, appearing with the first climate report.** No prior period had two report types to compare	~~the contradiction is *internal to it* (p34 vs p56)~~ **[Withdrawn rev 2: the p34 and p56 statuses are against different targets and the annual report reconciles them in the adjoining sentence.]** The surviving divergence is **cross-document**: AR p56 **G** against CRFD **"N/A"** on the *same* 2030 target. Neither document is inside the audited financial statements, so audited-source preference cannot resolve it (F-AP-4)	**Cross-document divergence on one target, plus a status published against an unstated target** (F-GOV-2): recast rev 2

#	CLAIM / METRIC	REPORT TYPES COMPARED	PER-PERIOD DIVERGENCE (AFTER NORMALISATION)	TREND IN DIVERGENCE	AUDITED-SOURCE PREFERENCE APPLIED (A-01B)	LABEL
2	Reduction driver	Annual report (2023-24) vs annual report (2024-25) vs climate report body vs climate report appendix	2023-24 AR p41: grid decarbonisation named. 2024-25 CRFD body p25 (realised, location-based): onsite solar only. 2024-25 CRFD appendix p29 (2020-21→2029-30, market-based): "primarily results from grid decarbonisation, **the roll out of Hunter Water Phase 1 and 2 Onsite Renewable Energy Program**, the AGL renewable PPA… and the Belmont Desalination Plant and energy efficiency and process optimisation initiatives"	**Divergence appears and widens**: the driver was attributed in 2023-24 and the current body names only one of the five drivers its own appendix lists, omitting the one the appendix calls primary	Neither document is inside the audited financial statements; the appendix and the prior-year statement both name grid decarbonisation, which the current body does not	~~Divergence~~ **Partial divergence, recast rev 2: an omission of the primary driver across a period and method difference the report never states, not a flat contradiction** (F-S2-1)
8 **(added rev 2)**	Onsite renewable capacity and generation	Annual report 2021-22 vs 2022-23 vs 2023-24 vs 2024-25	1.74 MW / 1,685 MWh → **the same two figures again** → 2.96 MW / 4,054 MWh reported as "a 25% increase year on year" (+141% on the last disclosed year) after "an additional 400kW" on 1.74 MW → capacity only	**Divergence is internal to one report type and never resolved**; the metric is then dropped in the year it most matters	Same report type throughout, so no preference applies; none of the figures sits inside the audited financial statements	**Divergence: an irreconcilable series** (F-S2-8)
9 **(added rev 2)**	Basis for the NGER treatment of treatment-plant emissions	Annual report 2023-24 vs climate report 2024-25	AR2024 p43: NGER "categorise these emissions as **Scope 3**". CRFD p23: excluded under the NGER **operational-control test**	**New divergence at 2024-25**, replacing an incorrect account with a correct one, silently	Neither is inside the audited financial statements; the CRFD account is the correct one	**Divergence: silent change of stated basis beneath the headline positive (F-INV-4, E7c)**
3	Target base year	Annual reports across 2022-23 to 2024-25 vs climate report tables and appendix	2022-23: 2005 / 82,097. 2023-24: 2020-21 / 81,025. 2024-25: 2020-21 / 81,026 **and** 2021-22 (Table 4) **and** 79,000 MB (Appendix A)	**Divergence appears at 2023-24 (the migration) and multiplies at 2024-25** (three statements in one suite)	Annual report values are the more consistent series (2020-21 / 81,026); the CRFD introduces the two additional statements	**Divergence** (F-BASE-1)
4	Scope 1 and Scope 2 figures	Annual reports vs climate report, 2020-21 / 2023-24 / 2024-25	**None**: CRFD Table 3 and the annual reports agree exactly on every disclosed figure (81,026 / 69,303 / 70,532; components sum correctly)	**No divergence; stable**	Consistent, so no preference needed	**No divergence**: the quantitative spine is internally clean (F-INV-2)
5	Scope 3	Annual reports 2019-20 to 2024-25 vs climate report	**None**: consistently absent; the only difference is that 2023-24 named a commitment to build the data and 2024-25 does not mention Scope 3 at all	**No divergence; the commitment was dropped** (P.3 #2)	n/a	**No divergence**: consistent omission (F-S3-1)
6	Carbon-neutral / net-zero claim wording	Annual reports 2019-20 → 2024-25 vs climate report	2019-20 "carbon neutral by 2030" → 2020-21 "net zero by 2030" → 2021-22 onward "net zero 2035" → 2024-25 "net zero Scope 1 and 2 by 2035, subject to customer willingness to pay"	**Divergence over time within one report type** (successive annual reports), resolved into a single consistent current formulation across both 2024-25 documents	Current-period statements agree across the annual report footnote and the CRFD	**Consistent currently; the historical change is undisclosed** (F-T-5, P.4 #1)
7	Assurance status	Annual report (statutory audit) vs climate report (p5 reviews vs p23 footnote)	No literal divergence: the audit covers financial statements, the reviews cover the report, the footnote covers the figures. But the three subjects are never distinguished for a reader	**New in 2024-25** with the first climate report	The audited perimeter is the narrowest of the three and reaches none of the emissions figures	**Prominence inversion, not divergence** (F-GOV-1, F-AP-4)

Prepared under the Climate Disclosure Review Rules v15.23 (controlled AI-assisted review). The body (§1–§7) states the verdict and may be issued on its own; the annexes are the working layer. General information only: not legal, financial or investment advice, an audit, an assurance opinion, or a NoCO2 certification or conformance determination. © Carbon Reduction Institute Pty Ltd, ABN 26 122 969 233.

Annex L: How each score was reached

Each audience score is built from a fixed set of load-bearing criteria, marked before the score is set. "Partial" means the criterion is satisfied only with reader effort that this audience can reasonably spend, not a soft failure. The count matters as well as the score: a score can reach its floor on two failed criteria, so two reports sharing a score may sit some distance apart on the detail below.

ID	AUDIENCE	CRITERION	VERDICT	WHY
A1	Carbon accounting	No material category excluded (Scope 1/2/3, incl. customer Scope 3 where material)	Not met	**Scope 3 is not quantified for any category in any period**, with no bounding estimate of any kind. For a water utility mid-construction on the Belmont Desalination Plant and delivering agreed treatment-plant upgrades and mains renewals, the material categories are obvious and named in the disclosure's own roadmap box without a figure: capital goods (the construction programme's embodied carbon), purchased goods and services (treatment chemicals and the contractor's operations and maintenance contract), fuel- and energy-related activities (transmission and distribution losses on the electricity behind 52,016 t of Scope 2), and waste (biosolids, which the report identifies as a reduction *opportunity* while not counting the emissions). Customer-side energy used to heat and pump supplied water, a recognised category for water utilities, is neither addressed nor ruled out. **Not workable:** nothing in any reviewed source lets a reader size the omitted layer, so it cannot be said whether the excluded value chain is larger or smaller than the 70,532 t reported, and OUT-STK-13's rebuttal test is not made. The framework does not require Scope 3 in year one, so this is a decision-usefulness gap and not a compliance finding.
A2	Carbon accounting	A single reconcilable footprint (no competing totals)	Not met	This is the unusual limb, and it fails on the baseline rather than the current year. **Three baseline values sit across the reporting suite against three stated base periods on two different methods:** 82,097 t CO_2-e against a **2005** base (the 2021-22 and 2022-23 annual reports), 81,025 or 81,026 t CO_2-e against **2020-21** (the 2023-24 and 2024-25 annual reports and the climate report's inventory table), and **79,000 t** market-based in the roadmap appendix, while the climate report's own target table names **2021-22** as the base period, a year for which **no inventory was ever published** in any report. There is no restatement note anywhere. Compounding it, **market-based Scope 2, the basis on which the targets are set and will be tracked, is not reported for any period**, so the current position cannot be placed on the basis the target is struck on. What does reconcile is recorded: the current-year inventory table sums correctly at every level, by scope, by source and by operator. **Not workable:** no reader action reconciles three baseline values on two methods, no inventory exists for the named base period, and no market-based figure exists to be derived.
A3	Carbon accounting	Method, boundary and version transparency (incl. restatements disclosed)	Partial	Method and boundary transparency for the current year is genuinely strong and is the best-served part of this disclosure. **Workable:** the accountant reads the methodology table, which names the calculation method and the activity-data source line by line, being NGER Method 1 for gaseous and liquid fuels and the water-industry Simple Wastewater Treatment Calculator for wastewater process emissions, and reads the boundary section, which states expressly that the boundary is drawn **wider than the statutory operational-control test** and why, and the inventory table, which disaggregates by operator so the contractor-operated half can be separated from Hunter Water's own. Residuals are recorded rather than treated as the defeat: the Basis of Preparation document was not provided and no factor values are disclosed, so the calculation cannot be independently reproduced; and the narrative Scope 1 source list is exhaustively framed ("our total Scope 1 emissions are from") yet omits the natural-gas boiler that the methodology table discloses. The undisclosed base-year restatements are counted at A2 rather than a second time here.
A4	Carbon accounting	Granularity and assurance sufficient to lift into a third party's inventory	Not met	Granularity is excellent and the two things the criterion also requires are absent. **No figure in the disclosure is assured**, which the report states expressly in a footnote, while page 5 describes three favourable external reviews of the *report* in terms a reader may take for assurance over the figures. And roughly **two-thirds of Scope 1 and just under half of Scope 2 come from the contractor's own emissions report**, which was not provided, is not independently verified, describes no verification Hunter Water performs over it, and cannot be reconciled to the contractor's group statutory row (945,868 t CO_2-e Scope 1, not attributable to Hunter Water's plants). Assurance *depth* is never scored and this is not a depth question: it is the total absence of assurance combined with an untraceable source for half the footprint. **Not workable:** no reader action substitutes for a document that was not provided, so an accountant lifting these figures would be lifting unverified contractor data they cannot trace to source.
I1	Institutional investors	Physical risk disclosed and financially linked or quantified (N-04)	Partial	The hazards a knowledgeable investor would expect of a regional water utility are identified and none of them is sized. **Workable:** the investor takes the completed asset-level climate vulnerability assessment, the NARCLiM 1.5 and 2.0 regional projections embedded in the supply models, the three assessed time horizons, the government Climate Risk to Assets Dashboard pilot now underway, and the concentration risk stated plainly, over 80% of drinking water drawn from the Williams River catchment, and forms an exposure view. Assessed for relevance to the business model and methodology transparency only, not modelling quality. Residuals recorded: a **single high-emissions scenario** (RCP 8.5) with no low-emissions or orderly-transition case, though transition risk is one of the two risk types the report identifies; no quantified financial effect; and a stated conclusion that material revaluations or impairments are unlikely, unreconciled with a 40-year water security plan and a desalination plant under construction to address drought risk.
I2	Institutional investors	Transition risk: target credibility, absolute caps or visible / derivable headroom	Not met	Target credibility fails on every limb the criterion tests. The **2035 net-zero endpoint is neither funded nor decided**: it expressly requires "further emissions reduction investment decisions … in our Price Path 2030 (PP30) … pending customer willingness to pay", and the target is stated throughout as subject to that test. **Gross emissions are projected to be higher in 2035 than in 2030**, a 76% gross reduction falling to 74%, with the gap closed by credits, and **26% of the 2035 target is tree-planting credits** whose registration status is stated two contradictory ways in one document and whose supply does not reconcile (about 45,000 stated generated against "up to 15,000 currently available", against an annual requirement of roughly 20,500). **No gross target exists at all**: the entity states it "does not have a formal gross GHG emission reduction target" and offers projections instead, against a framework that requires the associated gross target. **No permanence basis** is disclosed for the credits, in a region the same report identifies as bushfire-exposed. And the base year has moved twice while the target is measured on a method not yet reported. **Not workable:** no reader action supplies a gross target, a permanence basis, a funded 2035 decision or a market-based series.

ID	AUDIENCE	CRITERION	VERDICT	WHY
I3	Institutional investors	Target achievement: met with real reductions, progress stated honestly	Not met	The reduction is majority business-as-usual on the entity's own figures, and the progress statement does not survive the period. **About 55% of the planned 2030 reduction is grid decarbonisation**, being −43,000 t CO_2-e of a 78,000 t reduction effort on Hunter Water's own roadmap, against own action of about 23% and contractual renewable instruments of about 18%; the current-year narrative attributes the reduction to onsite solar alone, naming only the second of the five drivers its own appendix lists and omitting the one the appendix calls primary, and dropping the grid attribution the prior-year annual report disclosed. **Total emissions rose 1.8% in the period** (69,303 → 70,532) while the annual report reports a 13% reduction and "on track", with the rise stated nowhere and derivable only by subtracting two columns. **Scope 2 was flat**, a 17-tonne fall, in the year onsite capacity roughly doubled, and that flatness is two offsetting movements: a **729-tonne fall on Hunter Water-operated sites against a 712-tonne rise on the contractor-operated half**, so the only part the claimed driver can reach fell 2.5% while the other half rose 3.1%. **Scope 1 rose 31% on baseline and 7.2% in the year. Not workable:** electricity consumption and grid emission factors are not disclosed for any period, so the own-action share is cannot-verify.
I4	Institutional investors	Portfolio / financed-emissions exposure completeness	Pass	Not a financial institution and no material investment portfolio is identified, so there is no financed or portfolio layer to exclude. The criterion is reached and passes on the facts rather than being disapplied: the FI and PCAF module, SEC-FI-TGT-04 and SEC-FI-05A are all inapplicable to a regulated water utility.
I5	Institutional investors	Flow-through / look-through exposure raised and quantified	Partial	Raised structurally, and better than most, without being quantified. **Workable:** the investor takes the inventory table's split by operator, which is the entity's own disclosure, and can see that roughly half the footprint sits with a contractor and can track the two halves separately across periods, which is how this review established that contractor-operated Scope 2 **rose 712 t** in the year Hunter Water-operated Scope 2 fell 729 t, and that contractor-operated Scope 1 rose 28.6% on baseline against Hunter Water's own 35.6%. The election to bring the contractor's operations inside both the inventory and the targets is what makes that visible at all. What it cannot do is size the exposure or its trajectory: the contractor's own emissions report was not provided, no lever in the roadmap is attributed to the contractor-operated plants, and no arrangement for influencing them is disclosed, so the inherited movement is cannot-verify. The unverified-data limb is counted at A4 rather than a second time here.
I6	Institutional investors	Reconstructability by a sophisticated reader	Not met	The reconstructions that would test the disclosure's own claims cannot be performed from any reviewed source. **The real-versus-business-as-usual split cannot be computed**, electricity consumption and grid emission factors being undisclosed in every period, which is why the review records the beyond-business-as-usual share as cannot-verify rather than deriving it. **The target's own basis does not exist**: no market-based Scope 2 for any period, so progress against the 80%-by-2030 target cannot be computed on the method it is set on. **There is no single baseline to rebuild against**, three values on two methods across three named base periods, with no inventory ever published for the one the target table names. **Scope 3 is unavailable at any granularity.** And the one own-action lever the entity credits its reduction to cannot be rebuilt either: the onsite-generation series does not reconcile across three successive annual reports, one year's capacity and generation figures being repeated verbatim for the next, a stated "25% increase year on year" being an increase of 141% against the last disclosed year, and a capacity step of 1.74 MW plus 0.40 MW reported as 2.96 MW, with 2024-25 generation not published at all. **Not workable:** these are absences and internal contradictions, not effort a sophisticated reader can spend. What was reconstructable was reconstructed, and is recorded: the current-year inventory sums at every level and a four-period Scope 1 and Scope 2 series was rebuilt from the annual reports.
R1	Retail investors	Headline-to-evidence match without cross-document reconstruction	Not met	Neither the performance figure nor the status a retail reader meets can be matched to evidence in the document they open. The annual report reports **"a 13% reduction"** and **"we are on track to meet our 2030 commitment"** and does not state that emissions **rose 1.8%** in the period; the rise is derivable only by subtracting two columns of a table in a second document. And **neither published status can be tested**: the red on page 34 is measured against an annual target quantified **nowhere in the reporting suite**, greenhouse gas emissions not appearing at all in the page 16 corporate scorecard's actual, target and status table and page 34 carrying no target column; and the green on page 56 grades the 80%-by-2030 target on a location-based result while the same page's own footnote states the target is set on the market-based method, which is the reason the climate report declines to assess it. **Not workable, and the reason is precise:** OUT-STK-05's co-location escape is satisfied *as between the red and the green*, the reconciling sentence sitting directly beneath the red and cross-referencing page 56, and that is recorded to the entity's credit; but no correction anywhere in the suite states the year-on-year rise or publishes the annual target, so the escape does not reach the defeat.
R2	Retail investors	Targets cover the material sources; achievement stated honestly	Not met	**Coverage:** the targets cover Scope 1 and 2 only and the **entire value chain is untargeted and unquantified**. Worse for this reader, the 2030 target is a **net** target of which 4% is tree-planting credits, rising to 26% at 2035, and the audited annual report states the target three times without ever using the word "net", with the words "ACCU", "carbon credit" and "carbon offset" appearing **nowhere in that document**, so the credit leg does not exist in the document this reader opens. **Achievement:** "on track" in a year emissions rose; the reduction attributed to onsite solar in the year capacity doubled and Scope 2 moved seventeen tonnes; 55% of the planned reduction being grid movement the entity does not cause; three of the four target lines rated "On track" when two measure effort and process and one is expressly not yet tracked; and a 13 MW-by-2030 capacity target already exceeded by 6.4 MW delivered plus 8.3 MW contracted, disclosed in the two bullet points beneath the target itself. **Not workable:** no reader action supplies a Scope 3 figure, and the target's net character and credit share are absent from the document rather than buried in it.
R3	Retail investors	Material risks are legible	Partial	A non-specialist can see where the measured emissions are and what the physical exposure is. **Workable:** the reader takes the climate report's inventory table, which prints Scope 1 and Scope 2 by source and by operator in plain terms, the physical-risk section, which names the perils, the three horizons and the concentration risk (over 80% of drinking water from one catchment), and the roadmap, which shows the pathway's lever composition and its own gross figures. Residuals: the entirely absent value chain is counted at A1 and R2, and the unstated year-on-year rise at R1, rather than a second time here.
R4	Retail investors	Caveats findable, understandable and fairly presented	Partial	The caveats that exist are unusually well placed, and that is what keeps this criterion from falling. **Workable:** the reader meets the **willingness-to-pay condition footnoted at the 2035 target itself**, repeated in the roadmap and repeated again in the annual report's own scorecard footnote; the **Scope 1 and 2 bounding of both targets stated plainly wherever the target appears**; the reconciling sentence beneath the red status, which explains it and cross-references page 56; and a roadmap that discloses its own lever composition and its own gross figures, including that gross reductions reach 76% at 2030 and fall to 74% at 2035 and that credits deliver 4% and 26%. Residuals recorded and counted elsewhere: the willingness-to-pay condition does **not** attach to the 80%-by-2030 target in any document; the "100% renewable" target's inclusion of the mandatory renewable share is disclosed only in a roadmap assumption; and the net character of the 2030 target is absent from the annual report, counted at R2 and G2.

ID	AUDIENCE	CRITERION	VERDICT	WHY
P1	Consumers & public	Public claims literally true within their implied boundary	Not met	Two claims are not true within the boundary their words imply, and both sit in the documents this audience reads. **(a) The 2030 target.** The audited annual report states it three times as a plain **"80% reduction"** in greenhouse gas emissions, and the customer report card measure is an unqualified "% reduction in carbon dioxide equivalent emissions compared to a 2020-21 baseline". On the climate report's own terms it is an 80% **net** target including carbon offsets, 4% of it tree-planting credits, and the pathway's projected **gross** reduction is 76%. A member of the public reading the annual report is told the company will cut its emissions 80%; the target permits part of that to be credits, and the words "ACCU", "carbon credit" and "carbon offset" appear nowhere in that document to narrow the reading. **(b) "100% renewable electricity supply for our large sites by 2030."** On the entity's own stated roadmap assumption this scales "to 100% of LGCs ... **inclusive of mandatory obligations** under ... Renewable Power Percentage", so it counts the statutory renewable share every electricity customer already receives, and the voluntary increment is never separated. The climate report's own target *wording* is careful, being net, Scope 1 and 2 only and conditional, and that is recorded to the entity's credit; the defeat is **document-specific**, and the document it falls in is the audited one.
P2	Consumers & public	No greenwashing or misleading composite impression	Not met	A 13% reduction, "on track", "increased onsite solar generation", "100% renewable energy by 2030" and "net zero by 2035" compose, to a non-expert, into a utility cutting its own emissions on plan. On Hunter Water's own numbers **total emissions rose 1.8%** in the period, with the rise stated nowhere; **Scope 2 was flat** in the year solar capacity roughly doubled, and that flatness is a 729-tonne fall on its own sites against a **712-tonne rise** on the contractor-operated half that is the other half of the footprint; **Scope 1 has risen 31%** since baseline and is now a quarter of the footprint, the fastest-growing component being the entity's own liquid-fuel and gas combustion; **about 55% of the planned reduction is grid movement** it does not cause; the "100% renewable" target counts the mandatory share; **26% of the 2035 endpoint is tree-planting credits** whose registration status is stated two contradictory ways in one document and whose supply does not reconcile; and the roadmap books a permanent net increase for a plant the same document twice says will run entirely on renewable electricity. This audience has the **lowest caveat tolerance**, and the facts that would correct the impression are spread across a second document, its appendix, and five years of prior annual reports. Stated as a claim-quality and misleading-risk concern; no allegation of misconduct is made.
P3	Consumers & public	Genuine climate action visible versus inaction	Partial	Four things here are real, and two of them are decisions rather than disclosures. **Workable:** the public reader can see a **boundary election taken against the entity's own interest**, Hunter Water counting and taking target responsibility for the contractor-operated treatment plants that the statutory operational-control test excludes and the contractor reports, roughly doubling its own reported footprint from about 35,100 t to 70,532 t and explaining why; **6.4 MW of behind-the-meter solar built**, including the 3.1 MW Balickera Solar Farm commissioned late 2024, with a further 8.3 MW under contract, consumed on site rather than sold as an attribute; a **2030 pathway funded** inside the 2025-30 price determination and recovered through customer charges, with the roadmap legend separating approved levers from future-decision ones; and an external Community Committee of about 50 members constituted in June 2025 whose first stated function is to recommend the performance rating on a customer report card carrying the emissions measure. Residuals: the emissions effect of the solar is never quantified and 2024-25 generation is not disclosed; the 2035 endpoint sits outside the funded tranche; the committee has produced no rating yet and its recommendations are not binding, and its stated channel to the price regulator sits under a different function; and the growing part of the footprint has one uncosted, undated lever.
G1	Regulators	Standards compliance / readiness (AASB S2, Ch 2M, GHG Protocol, PCAF)	Partial	A **mandatory** first year, substantially delivered. **Workable:** the regulator reads a report prepared "in accordance with" TPG24-33 that delivers **all four pillars with a full requirements index**, on a boundary **wider than the framework compels**, alongside financial statements audited by the Audit Office of New South Wales carrying an express climate-consideration statement, with NGER Method 1 and the water-industry wastewater calculator named source by source, and a 2030 pathway funded inside the 2025-30 price determination; and the framework itself prioritises qualitative disclosure in year one. Absence from the statutory register is consistent with sitting below threshold on the entity's own statutory boundary, so there is no regulator-facing divergence there. Two residuals are **potential compliance concerns** rather than readiness gaps and are recorded as such: a **net target is disclosed with no associated gross target**, the entity stating it has none, and **no permanence basis** is disclosed for the credits, though the framework names permanence expressly. They do not defeat the criterion, and the reason is stated: both non-conformances are **disclosed on the face of the report**, with the 76% and 74% gross *projections* supplied in place of the missing target, so a regulator's decision is informed rather than defeated and can be acted on directly. Also open and recorded: no assurance over any figure, and no market-based Scope 2.
G2	Regulators	Cross-source / audience consistency	Not met	Hunter Water tells different things to different readers, in nine separate places. **(i)** The annual report's **G** against the 80%-by-2030 target and the climate report's **"N/A"** against the same target cannot both be right, one grading it on a location-based result while the other declines to assess it because the target is set on the market-based method. **(ii)** A **red status is published against an annual target quantified nowhere** in the suite. **(iii)** The base year is stated as **2005** (in force from the 2021-22 annual report), **2020-21** and **2021-22**, with three values (82,097, 81,026 and 79,000) on two methods and no restatement note, and no inventory was ever published for the period the target table names. **(iv)** The same 2030 target is a **net** target in the mandated climate report and an **unqualified "80% reduction"** three times in the audited annual report, which contains no occurrence of "ACCU", "carbon credit" or "carbon offset". **(v)** The **credit project's registration status is stated two contradictory ways in one document**, on the instrument delivering 26% of the 2035 endpoint, with 45,000 generated against 15,000 available unreconciled. **(vi)** The **onsite-generation series does not reconcile across three successive annual reports**, one year repeated verbatim, 141% reported as 25%, and 1.74 plus 0.40 given as 2.96. **(vii)** The **rationale for excluding the treatment plants from statutory reporting changed** between periods and the earlier account, that the scheme categorises them as Scope 3, is wrong on its face, the scheme having no Scope 3 category. **(viii)** The **reduction driver is attributed differently across periods**, the body omitting the primary driver its own appendix names. **(ix)** The **Belmont growth bar is irreconcilable** with the plant's own 100%-renewable condition, and first water is dated three ways across the suite. **Not workable:** no reader action tells a regulator which status governs, which base year is live, whether the target includes credits, or how much capacity was actually built.

Climate Disclosure Watchdog