

The Hon Greg Combet AM MP
Minister for Climate Change and Energy Efficiency
PO Box 747
Cardiff NSW 2285
Email: greg.combet.mp@aph.gov

CC: Tony.Windsor.MP@aph.gov.au
Robert.Oakeshott.MP@aph.gov.au

Dear Sir,

Re: Media Release, 'Landfill Changes Respond to Local Government'

We write to express our concern that the Clean Energy Bill has been amended to delay the implementation of the 10,000 tonne per annum threshold provision.

This provision was negotiated during the development of the CPRS to discourage 'waste transfer' from larger 'covered' to smaller 'uncovered' landfills. This provision was considered necessary at the time to avoid smaller 'uncovered' landfills having a significant cost advantage over their covered competitors and this leading to 'leakage' to the lower cost sites.

Yesterday's announcement that the 10,000 tonne per annum provision will not be included at the beginning of the emission trading scheme is unfortunate as it:

- Sends a message that smaller sites can continue without any attempt to manage their greenhouse gas emissions.
- Will delay the closure of many smaller sites.
- Will allow waste transfer to occur in the short term thereby frustrating the orderly introduction of the emission trading scheme.

Further, ALOA believes this measure will not ensure local government will be ready to respond to the demands of the Clean Energy Bill by July 1, 2012.

ALOA is the national association and representative voice for landfill owners across Australia who share a concern for the environment and business sustainability. Our members provide services in waste disposal, waste treatment and resource recovery. Collectively our members operate more than half of the landfill capacity across Australia, receiving in excess of 15 million tonnes of solid waste annually.

For further information please contact Max Spedding on 0400 880 677.

Yours Sincerely,



Max Spedding
Secretary
ALOA