

17 May 2010

Senator the Hon Penny Wong
Minister for Climate Change, Energy Efficiency and Water
PO Box 6237, Halifax Street
Adelaide SA 5000

Dear Senator Wong,

RE: NGRS REPORTING

I write to you on behalf of the Australian Landfill Owners Association (ALOA) to draw to your attention the significant inconsistency in the current NGER reporting requirements for the 'waste' sector (e.g. private landfills operators are obliged to report whilst local government landfills - which receive around one third of all waste - remain exempt).

ALOA is an incorporated entity comprising landfill owners (both the private and local government sectors) from across Australia sharing a concern for the environment and the sustainability of their businesses and is the representative voice of the landfill industry in Australia.

ALOA members operate more than half of the landfill capacity across Australia receiving over 15 million tonnes of solid waste annually. They also provide services in waste disposal, waste treatment and resource recovery and employ over 12,000 people.

Currently only private landfills - if they exceed the 25,000 tonne per annum CO₂e threshold - are required to report under NGRS.

ALOA believes that the inclusion of local government owned landfills into the NGER reporting will:

- a. assist in establishing a better understanding of the significance and quantum of landfill gas emissions across Australia,
- b. encourage the introduction of new or improved landfill gas collection and flaring installations,
- c. identify additional sites that have the potential to generate renewable energy,
- d. ensure all landfill owners commence to employ meaningful greenhouse gas reduction initiative as soon as practicable.

With the delay in the introduction of the CPRS announced April 27, 2010 ALOA believes that the NGRS reporting legislation should be amended in the near term to ensure that all landfill facilities with emissions over the NGER reporting threshold not just those owned by corporations, are required to report from the next 'reporting' year.,

Yours sincerely,



Max Spedding
Secretary
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