

22 December 2008

Steven Bygrave
 Department of Climate Change
 GPO Box 854 Canberra
 ACT 2601

**RE: CLARIFICATION OF TREATMENT OF LEGACY EMISSIONS
 FROM SOLID WASTE TO LANDFILL IN THE CPRS WHITE PAPER**

It would be appreciated if we could receive clarification on a section of the Carbon Pollution Reduction Scheme White Paper.

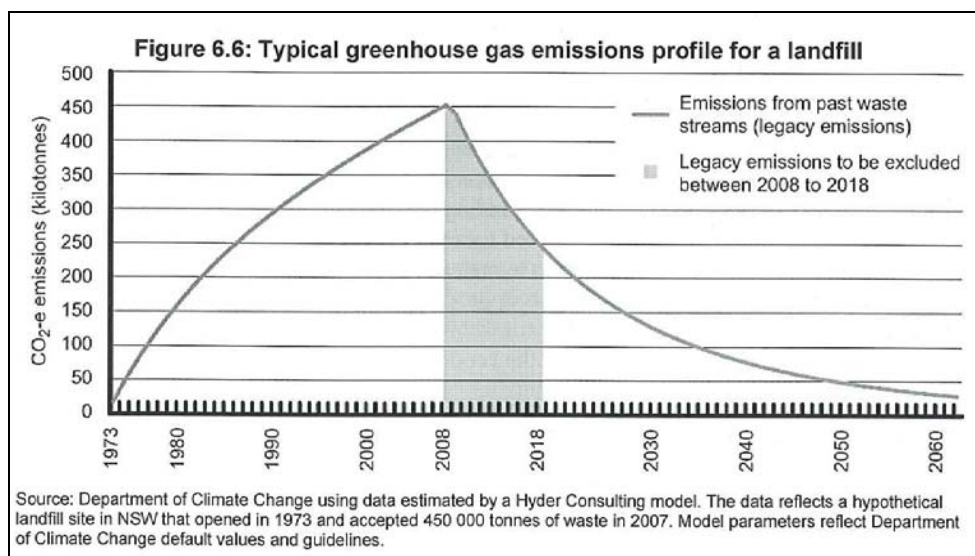
We would like to clarify the intention of **Section 6.10.1 Solid waste to landfill** (page 6-32) – regarding the exclusion of 'legacy emissions' (methane emissions from historical waste) from the Scheme until 2018 (in particular Figure 6.6), as well as the allocation of captured methane between 'legacy' and 'new' emissions.

1) Exclusion of 'legacy' emissions from waste deposited in the past

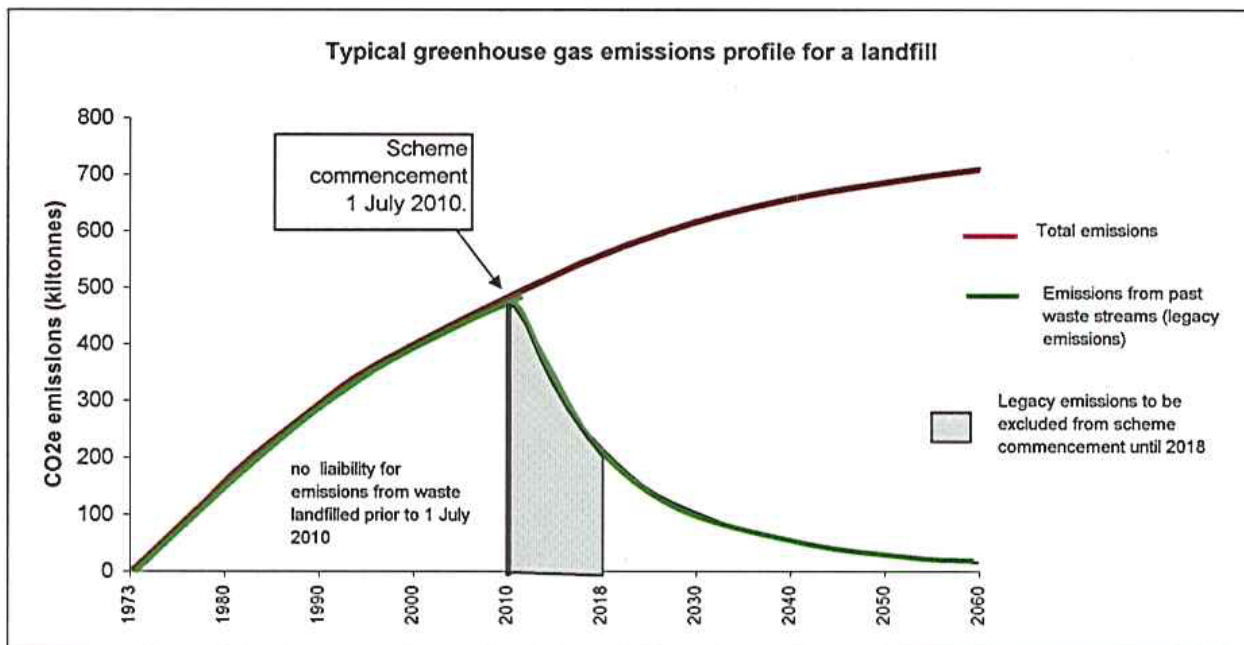
Our understanding of the intent of this policy position (Policy Position 6.1.7) is that:

- Emissions from *all* waste deposited prior to the start of the Scheme, that is, prior to *1 July 2010*, will be excluded from the Scheme until 2018.

However, Figure 6.6 from the White Paper (below) shows the methane profile of a landfill which is assumed to have closed in 2008, with a shaded period showing a portion of the legacy emissions excluded - between 2008 and 2018.



We would suggest that this figure should look like this:



2) Allocation of captured methane between 'legacy' and 'new' emissions

Policy position 6.1.7 also states that 'Methane that is captured will be allocated equally between legacy and new emissions'.

Our understanding of the intent of this policy position is that:

- Methane that is captured will be allocated *proportionally* between legacy and new emissions.

Over time, legacy emissions from 'old' waste will reduce, and emissions from 'new' waste will increase. Therefore the methane captured should be allocated between legacy and new emissions, in proportion to their percentage of total emissions.

We would appreciate it if you could clarify that our understanding of these two points is correct.

Yours sincerely,

Max Spedding
 Secretary
 ALOA

P: 0400 880 677
 E: max.spedding@veolia.com.au