Australian Government

Submission Template

Design of the Carbon Farming Initiative

Overview

This submission template should be used to provide comments on the consultation paper outlining the proposed design of the Carbon Farming Initiative.

Contact Details

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Confidentiality

All submissions will be treated as public documents, unless the author of the submission clearly indicates the contrary by marking all or part of the submission as 'confidential'. Public submissions may be published in full on the Department of Climate Change and Energy Efficiency website, including any personal information of authors and/or other third parties contained in the submission. If any part of the submission should be treated as confidential then please provide two versions of the submission, one with the confidential information removed for publication.

A request made under the *Freedom of Information Act 1982* for access to a submission marked confidential will be determined in accordance with that Act.

Do you want this submission to be treated as confidential? ☐ **Yes** ☒ **No**

Submission Instructions

Submissions should be made by **close of business 21 January 2011**. The Department reserves the right not to consider late submissions.

Where possible, submissions should be lodged electronically, preferably in Microsoft Word or other text based formats, via the email address – **CFI@climatechange.gov.au**.

Submissions may alternatively be sent to the postal address below to arrive by the due date.

Emerging Policy Section, Land Division
Department of Climate Change and Energy Efficiency
GPO Box 854
CANBERRA ACT 2601

Scheme design principles

ALOA supports the design principles incorporated in the legislation.

Scheme coverage

ALOA believes the Carbon Farming Initiative (CFI) should cover all emissions from waste deposited in landfills up to the date landfills are 'covered' by a mandatory emissions trading scheme.

This approach will avoid creating three waste categories in the future:

Legacy Waste: being waste received to 30th June 2011,

Intermediate Waste: being waste received from 1st July 2011 to the commencement of an ETS.

Post-ETS: being waste received from the commencement of an ETS.

As a consequence it is recommended that the legislation be changed to allow the Minister to determine the date when legacy waste terminates and that the reference to legacy waste extending only to June 30, 2011 be deleted.

Sale of units

Regional Communities, Water and Biodiversity

Integrity standards

ALOA believes the CFI should aim to apply standards that are consistent with current international practices (such as the Clean Development Mechanism) as applied under Kyoto procedures.

Additionality

ALOA is concerned that the assessment of project additionality, unless a simplified approach is established through the regulations, will lead to low interest in the offset scheme from landfill operators.

As such ALOA recommends that 'baseline' definitions be developed for various landfill categories and that these be incorporated in the CFI regulations as provided in 39(3) of the draft legislation.

In Australia landfill operations can be divided into three categories:

Non-putrescible:
- being landfills receiving non putrescible waste streams
- incorporating lined voids
- having no landfill gas collection systems

Putrescible:
- being landfills receiving putrescible / mixed waste
- incorporating lined voids with leachate collection / disposal systems
- having landfill gas management systems

Bioreactor:
- being larger landfills receiving putrescible / mixed and liquid waste
- incorporating lined voids with leachate collection and recirculation systems
- having 'mandated' landfill gas collection and power generation systems.

Notwithstanding that legislative regulations for landfills vary across Australia, the business as usual case for most sites ensures that a safe environment for employees is maintained and that there are no adverse environmental impacts at the site boundary.

These conditions are achieved by the use of void liners, daily cover, engineered caps and (in some cases) landfill gas management systems.

These landfill gas management systems include restricting the percentage of organic waste received, the use of bio-covers, bio-filters, natural gas venting/flares and active gas collection systems.

Considering these business-as-usual cases ALOA believes that the baseline for the three landfill categories should be:

Non-putrescible: - zero

Putrescible: - a percentage of the gas collected as determined by an independent study

Bioreactor: - a percentage as determined by a site by site assessment

In respect to the independent study referred to for putrescible landfills ALOA believes this should be developed using current international CDM practices and report a baseline percentage that equates to the Australian business-as-usual landfill situation.

In undertaking this study ALOA believes it is important to strive for a conservative result that will allow the resultant certificates to be sought after in both the domestic and international markets.

Permanence

Leakage

Scheme processes

Becoming a recognised entity

Project approval

Register of offset projects

Crediting periods
ALOA believes the proposed crediting period of three years is too short and recommends that a ten year period should be available for landfill projects.

Reporting

Crediting

Transfer or termination of projects

Methodology approval

ALOA believes that the methodologies that are approved should be consistent with current CDM practice and be derived from actual collection data and not modelled landfill gas emission estimates.

Taxation treatment of credits

Any additional comments