

26/02/09

Dr. Stephen Bygrave
Assistant Secretary Coverage & Market Development Branch
Department of climate Change
GPO BOX 854
Canberra ACT 2601

Dear Stephen,

RE: Waste Sector

Thank you for returning my call on Tuesday and taking the time to discuss our further concerns relating to the CPRS.

In response to your request to receive a note about the matters discussed I have listed the three points below:

1. We wish to reiterate that the waste sector does not have access to four measurement options and that currently only NGERs Method 1 is available. The timetable for the introduction of the other 'methods' is; Method 2 later this year and Method 4 (direct measurement) a chance by 2012/13.

Further as Method 2 takes one year to perform, it is unlikely that Method 2 results will be available across all sites by the first reporting deadline of October 2011.

2. We are concerned with comments that the legacy waste profile recorded in October 2011 will be fixed and will not be varied if a site moves to a higher measurement option.

Should this approach be adopted we believe that it could be possible for the legacy profile to exceed the methane generation profile developed from a higher method. As such we suggest that the legacy profile be varied in line with any change in the measurement method.

3. In respect to the operation of the variable threshold we believe this should be left at the discretion of the CPRS 'regulator' as the appropriate distance will vary with the price of carbon and transport costs - 80km is a reasonable number for \$20 per tonne carbon cost and \$100 per hour transport cost but these are variables that may change with time - and what is important is that significant volumes are not diverted to lower standard facilities.

Thank you again for speaking with me this week. We appreciate that the issues noted above will probably be left to the regulations and such we will have time to discuss these again in the future.

Kind regards



Max Spedding
Secretary
ALOA