

12 March 2014

Hon Greg Hunt
Minister for the Environment
Parliament House
Canberra ACT 2600
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CC: Alex.Caroly@environment.gov.au

Dear Minister

Emission Reduction Fund – Coverage of the Waste Sector

As requested at our meeting last Thursday our Association has conducted a survey of ALOA members to determine the number of individual landfills that will be captured under the Emission Reduction Fund should the threshold be increased to 100,000 tonnes of CO₂-e per annum.

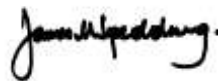
Based on information provided by our members, there are eighteen (18) landfills exceeding 100,000 tonnes of CO₂-e emissions per annum, which are operated by fifteen of our thirty-four members.

As indicated when we discussed Emission Reduction coverage last Thursday – and as we have maintained in our submissions over the past five years – it is important to remove the inequity created by covering the waste sector in a scheme that creates greater reporting obligations (and in some situations commercial disadvantage) to a sector of the industry. For example if a threshold of 100,000 tonnes of CO₂-e is adopted we will move from the 66 sites now covered – and 400 landfills left uncovered – to 18 covered and 448 uncovered.

As such ALOA reiterates its position that either all sites – or none – should be covered under the Emission Reduction Fund.

ALOA is keen to see the Emission Reduction Fund put in place. In the meanwhile it is committed to continuing to abate greenhouse emissions under the CFI.

Regards



Max Spedding
Secretary/Spokesperson
Australian Landfill Owners Association (ALOA)