

## **Emissions Reduction Fund Submission**

Safeguard Mechanism Branch  
Department of Environment  
GPO Bo 787  
Canberra ACT 2601

### **Introduction**

The Australian Landfill Owners Association (ALOA) is an incorporated entity comprising of landfill owners across Australia sharing a concern for the future viabilities of the environment and their businesses.

Members of the Association receive and manage over seventy per cent of the total solid waste generated in Australia. They provide services in waste disposal, waste treatment and resource recovery.

ALOA members employ state-of-the-art technology to minimize environmental impacts and capture methane generated by decomposing waste to produce renewable electricity.

### **Emissions from Waste**

Data available from the Australian Bureau of Statistics reports that in recent years there has been a significant decline in the total volume of greenhouse gas emitted from waste management facilities.

Further the *National Inventory Report 2012 Volume 3* reports that the emission from solid waste disposal on land decreased by 31% (4.1 Mt CO<sub>2</sub>-e) over the period 1990 to 2012 and was 11.5% (1.2 Mt CO<sub>2</sub>-e) lower than in 2011.

### **Safeguard Mechanism Consultation Paper**

It is noted that in the consultation paper that the safeguard mechanism proposes to 'cover' the waste sector – notwithstanding it only amounts to 1.4% of Australia's non-electricity emissions – and further that the paper's suggested approach is:

Landfill facilities would be covered if emissions from 'new' waste deposited after 1 July 2012 exceed 100,000 tonnes of CO<sub>2</sub>-e a year. Emissions from 'new' waste would also be used to determine whether a landfill facility has exceeded its emissions baseline.

Consistent with other sectors, emissions baselines for landfill facilities would be calculated using the highest level of reported total direct emissions – that is, emissions from all waste, regardless of when it was deposited – over the historical period 2009-10 to 2013-14.

### ALOA's Comments

ALOA believes that the 'waste' sector should not be covered by the safeguard mechanism as:

1. It is not a significant contributor to Australia's greenhouse gas emissions.
2. It has demonstrated over the past twenty-five years the ability to reduce its emissions.
3. It continues to demonstrate its commitment to reducing greenhouse gas emissions through the recent success of landfill gas destruction and waste diversion projects in the Emissions Reduction Fund Auction.
4. A small number of the larger landfills will trigger the 100,000 tonne baseline and consequently create a commercial disparity with smaller landfills.
5. NGER modeling is a useful tool for the recording of Australia's greenhouse gas emissions, however, there remains a number of discrepancies with the measurement tool when applied to individual landfills.
6. The historic NGER reported data available is likely to have inaccuracies due to significant changes in the methodologies over time and should not be relied upon to establish individual landfill baselines.
7. The widespread adoption of the Carbon Farming Initiative, and now the Emissions Reduction Fund, by the landfill sector is a more reliable approach to encourage and maintain pressure to reduce emissions.

ALOA understands the Government's desire that the safeguard mechanism should cover all sectors and as a result, should the sector be covered, recommends the following:

1. A 100,000 tonne baseline is applied to all landfill sites and with no reference being made to the historic NGER reported data.
2. Only emissions from waste landfilled after 1 July 2016 be included and reported in the Safeguard Mechanism.
3. NGER reporting to be required by all landfills with emissions over 25,000 tonnes of CO<sub>2</sub>-e per annum.
4. That future NGER reporting for landfills excludes emissions from onsite composting operations.

These recommendations are made to ensure 'coverage' by the safeguard mechanism:

- does not unfairly disadvantage those landfill operators who invested in gas capture;
- allows adequate time for landfills to adjust their gate volumes and waste composition to stay below the baseline; and
- does not constrain the current landfill rationalization program aimed at consolidating disposal to fewer better performing sites.

*Note these issues were discussed in detail with Daniel Besley and Fiona Gilbert in Canberra on Wednesday April 22, 2015*

### **Conclusion**

ALOA strongly believes that the waste industry should not be covered by the safeguard mechanism but recognizes that the current policy drafting is to cover all sectors.

In the event that coverage is applied to the waste sector ALOA recommends:

1. That a uniform baseline of 100,000 tonnes of CO<sub>2</sub>-e per annum be applied to all landfills.
2. That the mechanism applies only to emissions from waste received after 1 July 2016.

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**ALOA**

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