

Emission Intensity Benchmark Guidelines

April 15, 2016

This submission relates to Section 2.3 Landfills of the Emissions Reduction Fund: Safeguard mechanism, Emissions Intensity Benchmark Guidelines, April 2016

The Australian Landfill Owners Association (ALOA) was formed in 2008 as an industry association representing landfill owners from across Australia. ALOA members include both commercial and local/state government landfill owners.

ALOA is keen to see greenhouse gas emissions be reduced dramatically over the next decade and supports the introduction of the Safeguard Mechanism to drive down electricity and manufacturing emissions. However, ALOA believes it is inappropriate to cover the 'waste sector' under the Safeguard mechanism and as a result we again call for the sector to be removed from the provisions of the Safeguard Mechanism.

This position is based on the following reasons:

1. Establishing a reliable emission intensity benchmark for landfills is not possible

Although the current NGER determination allows the estimation of 'repeatable' results at a specific site, it cannot address the variability of waste composition, landfill placement methods and local climate conditions that exist across Australia.

As such ALOA believes that the establishment of a single emission intensity benchmark may result in some sites being unfairly assessed.

2. The average landfill is well below the 100,000 tonne CO₂-e threshold

Twenty-two million tonnes of waste per annum are currently landfilled across Australia. This means the average landfill site is around 35,000 tonne of waste per annum and much smaller than the quantity required to be included under the Safeguard mechanism threshold.

As such ALOA wishes to highlight that most landfills will not be impacted by the Safeguard mechanism.

3. Only 3-4 landfills are expected to exceed the 100,000 tonne of CO₂-e threshold post 2020

With advances in landfill gas collection and combustion, and the diversion of organics from landfill, it is unlikely that any of Australia's landfills are unlikely to exceed the Safeguard mechanism threshold until the mid 2020s.

However, a small number of strategically important landfills are expected to exceed the threshold due to their historic waste volumes received and potential large volumes to be received in the future. Thus these essential waste management facilities will be unfairly treated compared with smaller landfills that do not exceed the threshold.

As such ALOA believes other 'drivers' that impact **all** landfills should be introduced to reduce emissions from the waste sector.

4. Enforcement of current regulations and organic waste diversion programs offer a more reliable incentive for all landfills to reduce emissions.

Over the past twenty-five years the landfill sector has successfully demonstrated that it can reduce its emissions. This trend is continuing today with the expansion of landfill gas collection and destruction at smaller sites and greater organic waste diversion from landfills.

5. Further harmonization of landfill regulations and the continuation of incentives (such as the Emission Reduction Fund) will drive emissions lower over the next 5-15 years

Landfill owners have responded promptly to changes in their sector and all indicators suggest that this will continue well into the next decade. This will be achieved by installing new gas collection infrastructure at smaller landfills and diverting more organic waste to composting facilities.

As such ALOA strongly believes that the waste sector must be removed from coverage under the Safeguard mechanism.

Max Spedding
CEO

ALOA Melbourne April 15, 2016.

For further information please contact ALOA CEO - Max Spedding - on 0400 880 677 or at info@aloa.com.au .
