

**To** Department of the Environment and Energy  
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**From** Colin Sweet, CEO - ALOA

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**Date** July 17, 2017

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**Subject** **Climate Change Policies Review – Discussion Paper Submission**

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The Australian Landfill Owners Association (ALOA) was formed in late 2008. It is an incorporated entity with members from across Australia.

Modern landfills are an essential element in today's integrated waste management infrastructure as landfills:

- Offer cost effective and reliable disposal of recycling and processing residues and unsorted wastes;
- Manage greenhouse gas emission by methane collection and combustion;
- Provide a source of renewable energy;
- Have the flexibility to accept variable waste volumes; and
- Are reliable last resorts for the acceptance of large volumes of 'disaster' waste.
- Member landfills provide services to the general public, local government, industry, property developers, mining and agriculture.

ALOA members receive and safely manage the disposal of almost three quarters of the waste landfilled in Australia.

Since its inception ALOA has defended the interests of its members in national and state issues. In particular, ALOA campaigned for fairer treatment under the 'carbon' tax and worked closely with the Australian Local Government Association (ALGA) to develop the Voluntary Waste Industry Protocol to utilise collected carbon tax monies.

ALOA is governed by a 'national' board and has state 'chapters' in each of the mainland states.

## **RESPONSE**

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The Australian Landfill Owners Association (ALOA) welcomes the opportunity to respond to the current review of climate change policies discussion paper:

### **1) Climate change and the Waste Sector**

Over the past 30 years the landfill industry has been a major contributor to greenhouse gas abatement across Australia. Between 1990 and 2008, nett emissions from the waste sector reduced by 20% despite a 5% increase in tonnages of waste sent to landfills. The contribution by the waste sector to Australia's total greenhouse inventory has declined from 4.3% in 1990 to 2.6% in 2008.

Progress in reducing greenhouse gas emissions in the waste sector demonstrates that it is one of the few industries to achieve an effective decoupling between greenhouse gas emissions and economic growth. This has primarily been achieved by combusting methane from landfills in gas engines and generating renewable electricity using these engines. The landfill industry has also embraced the diversion of organic waste from landfill disposal, therefore reducing the production of methane, and composting it into useful agricultural products.

### **2) Emission Reduction Fund**

ALOA strongly recommends that the Government continue to support the Emissions Reduction Fund in its current form to maintain the current level of landfill gas capture and provide ongoing incentive for additional facilities to partake in the program.

### **3) The Safeguard Mechanism**

For numerous reasons ALOA believes that landfills should be removed from the Safeguard Mechanism. Primarily, it is more effective to reduce landfill gas emissions within the umbrella of the Emissions Reduction Fund and by default, most landfills are already uncovered because of their failure to achieve the threshold.

From an overall point of view, landfills form only a very small percentage of greenhouse gas emissions, which is reducing as a result of diminishing waste generation volumes. The 100,000 tonnes per annum threshold is likely to affect only 4-5 landfills across Australia.

### **4) Harmonisation**

ALOA continues to be discouraged by inconsistencies in environmental legislation across Australia. National waste management companies operating multiple landfills are concerned that there are widely differing standards for operating such important items of infrastructure from state to state.

ALOA would support a renewed effort by the Federal Government to harmonise environmental legislation and regulations across Australia.

### **5) Transporting Waste Over Long Distances**

The unnecessary transportation of waste over long distances reduces the incentive for businesses to invest in recycling and resource recovery infrastructure and the associated economic benefits and employment generation such investment brings. ALOA promotes the local management of waste and believes that its treatment and disposal should take place at the closest possible location to where it is produced.

Thank you again for this opportunity to present our concerns.

## **Further Information**

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