

Submission

To Safeguard and Industrial Policy Section
Department of the Environment and Energy
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From Colin Sweet, CEO - ALOA

Date March 29, 2018

Subject **Emissions Reduction Fund Safeguard Mechanism Consultation – ALOA's Response**

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 the majority 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.

Safeguard Mechanism Consultation Paper

The Safeguard Mechanism proposes to 'cover' the waste sector – notwithstanding this sector only amounts to 1.4% of Australia's non-electricity emissions – by limiting coverage to those facilities that exceed 100,000 tonnes of CO₂-e a year. The current estimate is that of the many hundreds of landfills in operation across Australia, only 6 are relevant to the Safeguard Mechanism.

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.
4. Only 6 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. Landfill emissions are impacted by changing weather conditions from year to year (drought versus flooding rain), waste composition and many other variables.

ALOA understands the Government's desire that the Safeguard Mechanism should cover all sectors, but:

1. Asks the Government to reconsider their plans to cover the landfill industry given the small number of facilities involved and the complications in doing so,
2. If the small number of landfills is included, and given that the 30% capture rate is accepted by both Government and Industry, and has been for some time, the Government recognises that either the current baseline rate of capture be continued or if this is unacceptable, a separate emissions intensity be recognised for each site.

These recommendations are made to ensure 'coverage' by the Safeguard Mechanism does not unfairly disadvantage those landfill operators who have made an early investment in gas capture.

Conclusion

ALOA strongly believes that the waste industry should not be covered by the Safeguard Mechanism but recognises 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 an emissions intensity is determined for each site, if a baseline capture rate of 30% is not acceptable to Government.
2. Emissions be calculated over a longer period to smooth out the peaks and troughs caused by weather variations and waste mix variations, hence the concept of calculating emissions based on a grandfathering arrangement.

For further information please contact Colin Sweet at info@aloe.com.au

ALOA

30/03/2108