

Conrad Buffier Manager, Safeguard & Industry Policy | Climate Change Division Department of Industry, Science, Energy and Resources methoddevelopment@cleanenergyregulator.gov.au

15 September 2021

Dear Mr Buffier,

Re: Safeguard Mechanism: Prescribed landfill capture efficiency

Thank you for the opportunity to provide stakeholder feedback on the prescribed landfill gas capture rate Safeguard Mechanism.

By way of introduction, the Australian Landfill Owners Association (ALOA) was formed in late 2008. We are an incorporated entity with members from across Australia.

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

- 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
- Are reliable last resorts for the acceptance of large volumes of 'disaster' waste
- Member landfills provide services to the general public, local government, industry, 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.

ALOA is governed by a 'National' Board and has State 'Chapters' in each of the mainland states.

We wish to congratulate the Department on its efforts to liaise and consult with industry and recognise that the outcome of this process is a compromise between the various parties involved in the process. Whilst we have found the legislation challenging at times, we are grateful for the various opportunities to engage in meaningful discussions with the Department to gain a better understanding of them.

We believe that the 37.2% landfill gas capture rate is a worthwhile outcome.

Thank you again for this opportunity to provide comments. We would be delighted to continue to work with the Department to achieve improved environmental outcomes. Yours sincerely

Colin Smut

Colin Sweet CEO ALOA