

To Mark Hunston
Department of Industry Science and Resources

From Colin Sweet, CEO
Australian Landfill Owners Association

Date: 28 April 2023

Subject: **Proposed NGERs Amendments**

Thank you for the opportunity to provide feedback on the proposed NGERs Amendments.

The Australian Landfill Owners Association (ALOA) was formed in late 2008 and is the national body representing landfill owners across Australia.

Our primary purpose is to work with our members and government to develop and amend legislation that maximises the benefit the community receives in having well located, professionally operated and highly compliant engineered landfills.

ALOA is the only Association entirely focussed on the landfill industry; an industry that is an essential service to the community and our membership spans both private industry and local government.

Summary

ALOA provides the following feedback on the proposed NGERs amendments, seeking to assist landfill operators as well as more accurate landfill gas capture rate recognition.

1. **ALOA strongly supports the review of the *National Greenhouse and Energy Reporting (Measurement) Determination 2008* NGERs (Measurement) Determination methods for solid waste disposal on land ahead of 1 July 2023.**

It is envisaged that DCCEEW's proposed amendments (subject to minor amendment as recommended below) will immediately address the concerns that have been raised in regard to increased accuracy of reported data for site emissions and subsequently, increased accuracy of emissions reporting for the sector overall, as well as elements relating to the Safeguard Mechanism.

2. **ALOA strongly supports the proposed updates to Method 1, which recognises that landfill gas collection efficiency up to 95% is achievable:**

- The proposed amendments will encourage landfills to improve their gas collection efficiencies, without the perverse outcome of increasing emissions.
- The proposed move to utilise 5.15C in Method 2 to assist to calculate collection efficiencies for landfills will encourage landfills to use improved capping techniques that will assist to drive up landfill gas collection and reduce emissions from the sector.
- The proposed approach enables a more tailored method to determine site specific emissions, without imposing additional significant costs or administrative burden on reporters.

3. **We suggest minor amendments be made to 5.15C to reflect capping practices and capping technologies have advanced since the development of this method:**

- ALOA advocates for capping utilising a phytocap to be elevated as A5. Phytocap technology has significantly advanced since Method 2 was originally released, and research has identified that phytocapping, which is now accepted as an engineered final cap can be as effective as a final clay cap over of 1 metre or greater (for example, refer to Venkatraman, Kartik & Ashwath, and Nanjappa, (2022), and Phytocaps Reduce Methane Emission from Landfills).
- ALOA advocates for the word 'final' to be removed from 5.15C A4(b) and A5(a). Progressive clay capping is currently used as a landfill management technique, which assists to reduce emissions

to atmosphere. These clay caps are not always final but have the same emission reduction benefits to the relevant section of the landfill.

4. Additional considerations that could be included in amendments to Method 1 post 1 July 2023 are:

- The changing nature of waste, including from improved waste management practices and waste policies, means that the waste compositions included in NGERs (Measurement) Determination may be outdated. It is proposed that the overall scope of these compositions be considered for adjustment to include consideration of food organic garden organic (FOGO) practices, and the increased use of bioplastics in defaults.
- The continued development of 5.15C to align its application to what is physically occurring at landfills. Specifically, assessment of the default percentages assigned to A2 to A5 and the consideration of other capping technologies such as biocovers. This will assist Australia's reporting outcomes to better reflect the actual outcomes of landfilling and ensure that accurate emissions data is obtained.

We are happy to meet to discuss our position.

Yours Sincerely



Colin Sweet
CEO