



Mr Conrad Buffier
Manager, Safeguard & Industrial Policy
Climate Change Division
Department of Industry, Science, Energy and Resources

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12 March 2021

Dear Mr Buffier

Re: Safeguard Mechanism – landfill sector capture rate

Thank you for the opportunity to provide feedback on the Safeguard Mechanism – landfill sector capture rate, and for presenting the paper to members of the Waste Management and Resource Recovery Association of Australia (WMRR) in February.

WMRR is the national peak body for all stakeholders in the essential waste and resource recovery (WARR) industry. We have more than 2,000 members across the nation, representing the breadth and depth of the sector within business organisations, the three (3) tiers of government, universities, and NGOs. Our members are involved in a range of important WARR activities within the Australian economy, including infrastructure investment and operations, collection, manufacturing of valuable products from resource recovery, as well as responsible management of residual waste including landfilling and energy from waste.

WMRR notes that the proposed changes will impact Australia's largest landfills as the Safeguard Mechanism covers facilities with an annual scope one (1) direct emissions of 100,000t of carbon dioxide equivalent or more, meaning some five (5) to six (6) landfills may be impacted although at this time, it does not appear that any of these larger sites have reached the threshold.

Following a review of the paper, WMRR makes the following observations and recommendations:

- While WMRR acknowledges the value in abiding by consistent principles across all safeguard sectors in the calculation of the prescribed capture efficiency, the landfill sector has a number of unique factors – as also noted in the paper – which makes an arbitrary approach inappropriate for the sector. WMRR proposes that when landfills eventually reach the 100,000t threshold, that the department conduct a full analysis and scientific evaluation to assess these emissions in order to come up with an appropriate and robust capture efficiency rate. To that end, option one (1) is not supported.
- WMRR believes that the broad and continued use of a national reporting model as a basis for regulation of individual sites is problematic. For one, the method used is intended for ease of application at a national accounting level and is inappropriate to assess performance at a site level due to examples of extreme variance with site observations. Further, and significant to this paper, the current NGER dataset is incomplete as there are landfills that are currently not reporting under NGER. To ensure equitability across the sector, WMRR suggests that the

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department refrain from using an incomplete dataset to inform the baseline, regardless of how many sectors are currently using NGERS data.

- Amongst the two proposed alternatives, option two (2) is preferred as this would lead to Australia's largest landfills being obliged to maintain a gas capture rate of at least half the average of NGER reporters. However, the department must be aware of potential costs that these facilities will incur, which could lead to the unintended consequences of either driving up gate fees or diverting materials to smaller sites that may have lower levels (though still acceptable) of performance.

Please do not hesitate to contact the undersigned if you would like to discuss WMRR's feedback further.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gayle Sloan'.

Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia

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