

May 3, 2017

Climate Change Policies Review - Discussion paper submissions  
2017 review branch  
Department of the Environment and Energy  
GPO Box 787  
CANBERRA ACT 2601

**By email - [climatechangereview@environment.gov.au](mailto:climatechangereview@environment.gov.au)**

2017 Review Branch,

The National Waste and Recycling Industry Council (NWRIC) welcomes the opportunity to comment on the current [Review of climate change policies - Discussion Paper](#).

The NWRIC is a newly formed waste and recycling industry group comprising both national businesses and state associations. Our members represent the majority of the private market capital invested into waste and recycling assets in Australia. The NWRIC advocates on behalf of these companies.

Our core activity is to proactively engage with all of the industry's stakeholders to promote solutions to the regulatory challenges facing the sector. For details on our policy positions, please visit [www.nwric.com.au](http://www.nwric.com.au).

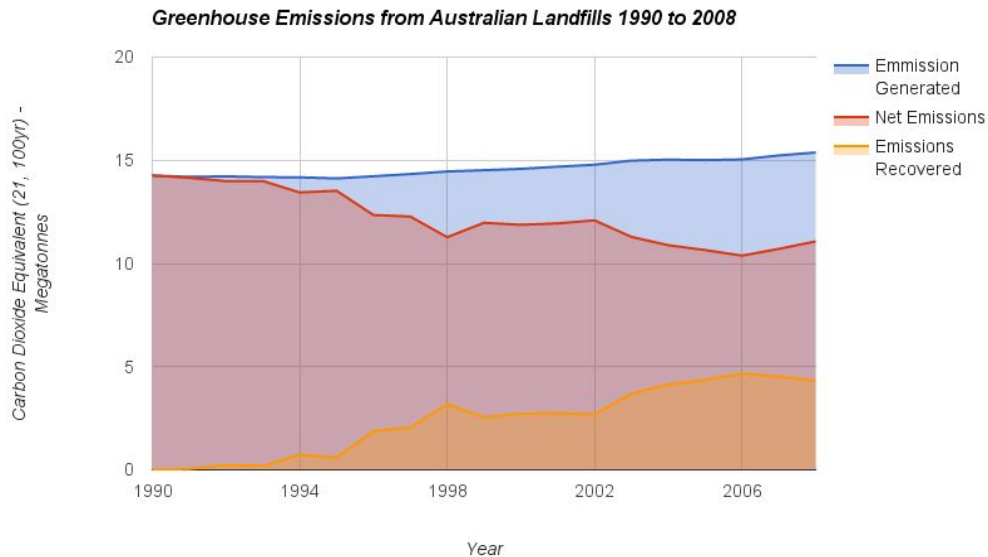
On behalf of our members the Council wishes to register the following submission -

## A) Climate change and the waste sector

Over the past two decades the waste and recycling industry has been a major contributor to greenhouse gas abatement programs across Australia. Between 1990 and 2008, net emissions from the waste sector declined by 20%. The waste sector's contribution to Australia's total greenhouse inventory has also declined, from 4.3% in 1990 to 2.6% in 2008.

This decline in greenhouse emissions happened despite waste generation rates growing by more than 5% per year during this period. This progress makes the industry one of a very small number to achieve a meaningful "decoupling" between greenhouse emissions and economic growth. Overall, the greenhouse footprint of the waste industry continues to decline despite growing waste volumes.





Source - Australian Bureau of Statistics

This has been achieved by:

- Combustion of methane from landfills and the use of the heat generated to provide renewable electricity<sup>1</sup>;
- The recycling and reuse of high embodied energy materials - such as aluminium, steel and glass - to reduce energy consumption;
- The diversion of organic waste from landfill to reduce the quantity of methane generated from decomposing waste;
- The creation of compost “soil conditioners” that are contributing to improvements in soil carbon and reduced chemical fertiliser use;
- The generation of renewable energy from anaerobic digestion of organic (in particular food) wastes<sup>2</sup>;
- The reduction of of methane emissions by better landfill operation and closure programs.

## B) Emission Reduction Fund

The NWRIC calls on the Federal Government continue to support its current Emission Reduction Fund (ERF) - which contains a number of methodologies driving pollution reduction in the waste and recycling industry. Additionally, it calls for the expansion of the ERF to include new methods to encourage further sequestered soil carbon from the application of compost for land rehabilitation, as well as generation of electricity from the thermal processing of organic waste.

<sup>1</sup> Landfill gas companies have actively worked to cover Australia’s large landfills with gas capture infrastructure, with most existing and all new landfills now covered.

<sup>2</sup> This now includes co-digestion, where additional capacity at STP anaerobic digesters is used to compost food waste - but liquid and solid.



## C) The Safeguard Mechanism

In respect to the Safeguard Mechanism the NWRIC supports current industry calls for Safeguard 'coverage' of the waste sector to be removed from all landfills.

The Council makes this call as;

1. It believes the ERF is the more effective program for encouraging methane emission reduction, especially when combined with State action to divert organics from landfill.
2. Only covering three to four of Australia's largest landfills has undesirable market consequences<sup>3</sup>, and does not represent a fair and rational approach to greenhouse reduction.

## D) Harmonisation

To further improve the waste and recycling industry's contribution to greenhouse abatement the NWRIC calls on the Federal government to commence a renewed campaign to harmonise the environmental legislation and regulation across all states and territories.

The NWRIC makes this request as current anomalies are encouraging unnecessary long distance haulage of waste (in many cases to avoid landfill levy imposts) and other inefficiencies.

For further information please contact either Max Spedding (0400 880 677) or Alex Serpo (0417 932 303).

Sincerely,

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<sup>3</sup> Industry experience indicates that government policies targeting specific landfills tend to results in unnecessary waste transportation. The Council believes regulations should cover either all or none of the industry.

