

Safeguard and Industrial Policy Section
Department of the Environment and Energy
GPO Box 787
Canberra ACT 2601

To Whom it May Concern,

The National Waste and Recycling Industry Council ([NWRIC](#)) acts as the industry's national policy setting body. Its core activity is to proactively engage with all of the industry's key stakeholders to promote solutions to the regulatory challenges facing the sector.

The founding members of the Council - Alex Fraser Group, Cleanaway, J. J. Richards and Sons, Solo Resource Recovery, Sims Metal Management, Suez, Toxfree, Remondis, ResourceCo and Veolia - represent the majority of the private capital invested into waste management and recycling assets in Australia.

While the Council is a national body, it also works proactively with Affiliates, which represent the interests of the industry at a State level. Through collective action, the Council and its State-based partners form a network representing the industry Australia wide.¹ The NWRIC welcomes the opportunity to comment on the *Emissions Reduction Fund Safeguard Mechanism Consultation Paper*, and makes the following comments.

General notes on the Safeguard Mechanism and landfills

Organics diversion is the best mechanism to control greenhouse emissions at landfills

As a general principle, the NWRIC believe the most effective mechanism to reduce greenhouse gas emissions is via incentives to divert organics from landfill. Diverting organics to compost can also have the additional greenhouse benefit of improving soil carbon. Conversely, applying greenhouse regulation generation to landfills is difficult because;

- 1) Greenhouse emissions from landfills are very difficult to calculate accurately, and vary with time.
- 2) Emissions from landfills are delayed, and depend on a number of factors including climate and rainfall.

Accounting for disaster waste management

Large volumes of waste can be produced by natural disasters. For example, a study conducted in 2015 by Green Industries South Australia found that a major earthquake in the State could produce 8 million tonnes of waste. This material must be sent to landfill in the interest of public safety.

In the case of the Safeguard mechanism, the sudden onset of large waste volumes could result in a delayed spike in emissions. It may not be practical to put in place gas capture infrastructure to cover these emissions. It could push certain facilities into the compliance zone (100,000 tpa CO₂-e) for a short period. The NWRIC advises putting in place a 'disaster provision' - which allows for this contingency. For example, we could say that legacy *and* disaster waste is excluded from Safeguard compliance.

¹ NWRIC's state 'Affiliates' are; the Waste Recycling Industry Association of Queensland (WRIQ), the NSW Waste Contractors and Recyclers Association (WCRA), the Victorian Waste Management Association (VWMA), the Waste Recycling Industry Association of South Australia (WRI-SA) and the Waste Recycling Industry Association of WA (WRI-WA) and the Waste Recycling Industry Association of the Northern Territory (WRI-NT). They represent every Australian jurisdiction except Tasmania.

The Safeguard Mechanism may result in additional waste transport

Where regulations are placed selectively on certain landfill sites (in this case, facilities above the 100,000 tonnes per annum threshold) - this may result in additional waste transport. If the price of transport is lower than the additional gate fee caused by regulatory change, waste will be transported to other sites.

Position

The application of the 'Safeguard Mechanism' to only landfills over 100,000 tonnes (per annum of carbon dioxide equivalent) will create market distortions as only five to seven of over 600 landfills in Australia will be covered. The NWRIC strongly recommends that 'Safeguard coverage' be removed from landfills as part of the current Commonwealth review.

Contacts

Max Spedding
NWRIC CEO
ceo@nwrlic.com.au
0400 880 677

Alex Serpo
NWRIC Policy Officer
secretariat@nwrlic.com.au
0417 932 303