

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

Dear Mr Buffier,

**RE: Safeguard Mechanism: Prescribed capture efficiency - Landfills**

The National Waste and Recycling Industry Council (NWRIC) welcomes the opportunity to provide a submission in response to the Safeguard Mechanism: Prescribed capture efficiency for Landfills Consultation Paper dated February 2021.

The NWRIC is a not-for-profit industry association, funded by major waste and recycling businesses operating Australia wide that own and operate 8 of the 12 largest landfills in Australia. It brings together national waste and recycling business leaders and affiliated state waste and recycling associations to formulate policies that will advance waste and recycling services in Australia. Ensuring a safe, fair and sustainable waste and recycling industry.

The NWRIC works closely with the Australian Landfill Owners Association.

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.

**In response to the targeted consultation paper:**

- It is generally agreed that there is a very limited number of landfills affected by the Safeguard Mechanism because very few facilities exceed 100,000 tonnes of CO<sub>2-e</sub> emissions per year.
- The suggested use of either a weighted (0.6-0.7) or non-weighted (0.35 – 0.45) average prescribed capture efficiency rate is not supported as it will not be a fair or equitable to landfill operators given the substantial variability in the physical nature and performance of landfills (i.e., their construction and operating environment). These factors significantly effect what capture efficiency can be reasonably expected.

**MEMBERS**

Cleanaway | JJ Richards and Sons | Veolia | Solo Resource Recovery | Sims Metals Management | ResourceCo. | Sell & Parker

**STATE AND TERRITORY AFFILIATES**

Waste Recycling Industry Queensland (WRIQ) | Waste Contractors and Recyclers Association of NSW & ACT (WCRA) | Victorian Waste Management Association (VWMA) | Waste Recycling Industry of South Australia (WRISA) | Waste Recycling Industry of Western Australia (WRIWA) | Waste Recycling Industry Northern Territory (WRINT)

- Obligating any landfill to capture a fixed amount of estimated landfill gas poses significant difficulty, and by setting a fixed amount, there is also no consideration of the constraints and requirements of landfilling practices.
- The NWRIC therefore considers that once a landfill approaches the 100,000 tonnes of CO<sub>2-e</sub> emissions per year it should use full analysis and science to assess the landfill gas emission volume and the landfill gas capture rate.
- Or alternatively align the safeguard baseline to the Emissions Reduction Fund baseline. Having two pieces of legislation referencing the same business as usual gas capture (30%) would align the two policies.

I would be happy to facilitate a meeting with our members to discuss the above feedback with you further.

Yours sincerely,



**Rose Read**

CEO

ceo@nwrlic.com.au

0418 216 364

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