



Mr David Fredericks PSM
Secretary
Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
Canberra ACT 2601
Email: ACCUSecretariat@dcceew.gov.au

Submission via [online portal](#)

25 March 2025

Dear Mr Fredericks

Re: Review of the Animal Effluent Management ACCU method

Thank you for the opportunity to provide feedback on the Emissions Reduction Assurance Committee (ERAC) on the ACCU Scheme Carbon Credits (Carbon Farming Initiative – Animal Effluent Management) Methodology Determination 2019 (“the AEM method”). The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia’s \$17 billion waste and resource recovery (WARR) industry. With more than 2,300 members from over 410 entities nationwide, we represent the breadth and depth of the sector, including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs), including research bodies. Our members are involved in a range of important WARR activities within the Australian economy, including infrastructure investment and operations, collection, manufacturing of valuable secondary raw products from resource recovery, energy recovery as well as community engagement and education.

Being at the forefront of the ongoing evolution towards a whole-of-system action and the development of a circular economy, WMRR strongly advocates for a systems-based approach to managing materials in Australia. This includes fierce advocacy for the waste and resource management hierarchy, which promotes avoidance of waste, and the diversion of suitable materials from landfill through preference for the reuse, recovery, recycling and composting of appropriate resources. Resource recovery necessarily mitigates negative carbon impacts and promotes its sequestration.

The existing AEM method applies to projects, to develop new facilities for the treatment of animal effluent that reduce the methane generated- resulting in fewer emissions than if the effluent were treated in an anaerobic pond. These processes typically produce biogas, and a liquid waste or sludge. Eligible projects typically collect and destroy methane emitted from waste storage lagoons, with a combustion device such as flaring system, electricity generation system and/or a gas boiler. Further emissions avoidance is achieved if the project also removes volatile solids using a solids separation diversion method and treats them using an aerobic process. These further emission reductions are minor in comparison to avoided methane/ nitrous oxide emissions.

WMRR NATIONAL OFFICE
57 ST JOHNS ROAD
GLEBE NSW 2037
(02) 8746 5000
INFO@WMRR.ASN.AU

WMRR.ASN.AU

Whilst there has been limited uptake of the AEM method (and its legacy methods), WMRR acknowledges the potential for such carbon offsetting projects to significantly decarbonize pathways in Australia's agrifood system. According to the European Biogas Association's *Biogas and Biomethane Report, 2015*, 80% of biogas plants in Europe use farm waste as their primary input material. Biogas has the potential to become a valuable contributor to Australia's renewable circular future, however, the costs of methane recovery technologies cannot be understated. The biogas industry in Australia is still emerging and somewhat dominated by landfill gas capture – the ACCU method for which has proved highly successful in reducing emissions from the WARR sector. Noting that eligible wastes for AEM method projects will be from dairies and piggeries which would likely use this method on site, the upfront technology costs for Australia's farmers needs to be considered as a strong deterrent.

As per previous WMRR submissions to ERAC, WMRR stresses the need for Australia to adopt a 'systems approach' to decarbonise our supply chains and recover our resources (including energy). WMRR enthusiastically supports ACCU methods that also reduce reliance on disposal infrastructure (i.e. landfills) whilst also creating a valuable recoverable commodity (such as Combined Heat and Power) from the process. Participation in the Emissions Reduction Fund can underscore the economic viability of abatement projects.

It follows that WMRR supports the proposed recommendations for:

- extending the crediting period for flaring projects by three (3) years and electricity projects by eight (8) years (each to a total of 15 years) . This demonstrates an awareness of the hurdles faced by operators to finance and implement the technologies required;
- allowing completed projects from the AEM method and legacy animal effluent methods to restart crediting and to integrate Wastewater Method 2015 activities into the AEM method 2019. Restarting the crediting periods should encourage project participation by enabling a more adequate timeframe to generate the financial return required to rationalise investment in new equipment and/or pay for audits;
- updating a AEM method system, re-starting a non-operational system or installing new systems to regulate and combust biogas and help reduce methane emissions should be enabled to earn ACCUs. This would be consistent with the approach taken under the Landfill Gas Method;
- expanding the range of eligible materials allowed under the method, and
- making changes to the method to improve the implementation and operation of AEM method 2019 projects.

Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely



Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia

WMRR NATIONAL OFFICE
57 ST JOHNS ROAD
GLEBE NSW 2037

(02) 8746 5000
INFO@WMRR.ASN.AU

WMRR.ASN.AU