Mr Mike Kaiser
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 July 2025

Dear Mr Kaiser

Re: Animal Effluent Management Method: 2025 Variation

Thank you for the opportunity to provide feedback on the Carbon Credits (Carbon Farming Initiative—Animal Effluent Management) Methodology Determination Variation 2025 ("the 2025 Variation"). The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's $21 billion waste and resource recovery (WARR) industry. With more than 2,300 members from approximately 400 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.

WMRR champions a systems-based approach to material management in Australia. Central to this is our strong advocacy for the waste and resource management hierarchy, which prioritises waste avoidance and the diversion of suitable materials from landfill through reuse, recovery, recycling, and composting. Effective resource recovery not only reduces carbon impacts but also supports carbon sequestration.

In our March 2025 submission on the proposed Animal Effluent Management Method (AEM Method), WMRR highlighted the potential for biogas to play a significant role in Australia's renewable, circular future. However, we also stressed the need to recognise the high upfront technology costs, which pose a substantial barrier for many Australian farmers to participate in the ACCU scheme. In this submission, WMRR again reiterates its support to extend the crediting period for flaring projects by three (3) years and electricity projects by eight (8) years—bringing both to a total of 15 years. These extensions proposed by the 2025 Variation acknowledge the financial and implementation challenges faced by industry, including the dairy and piggery project operators when adopting on site abatement technologies.

Furthermore, WMRR commends ERAC for acknowledging that increased capital and operational costs can limit project payback and deter participation in the ACCU scheme. Given that other emissions

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avoidance methods are generally limited to a seven (7)-year crediting period, we urge consideration of similar extended crediting provisions for those methods as well given the reliance on capital investment to deliver such abatement 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