



The Emissions Reduction Assurance Committee
Clean Energy Regulator
Department of Industry, Science, Energy and Resources
GPO Box 621
CANBERRA ACT 2601

11 June 2021

Dear Sir/ Madam

Re: Landfill gas (generation) method – proposed new method

Thank you for the opportunity to provide feedback on the draft Carbon Credits (Carbon Farming Initiative—Electricity Generation from Landfill Gas) Methodology Determination 2021.

The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body for all stakeholders in the essential waste and resource recovery (WARR) industry. We have more than 2,000 members across the nation, representing the depth and breadth of the sector within business organisations, the three (3) tiers of government, universities, and NGOs. Our members are involved in a range of important WARR activities within the Australian economy, including infrastructure investment and operations, collection, manufacturing of valuable products from resource recovery, energy recovery as well as community engagement and education.

WMRR welcomes the move to increase the crediting period for landfill gas electricity generation projects from seven (7) to twelve (12) years and appreciates the Committee recognising the important need for this new Determination.

This Determination will continue to incentive maximum gas capture at landfills by allowing electricity generation projects to continue generating Australian Carbon Credit Units (ACCUs) for a further five (5) years – this is fully supported by WMRR and industry.

It is essential that the new method is finalised before December 2021. This will facilitate a smooth transfer for existing projects registered under the 2015 methodology determination that are otherwise due to expire at the end of the year – and thus safeguard continued carbon abatement at these sites.

The WARR industry has been responsible for more than 24.5 million of the ~95 million tCO₂-e abated under the ERF to-date¹, with the overwhelming majority of this contribution coming from the landfill sector. The proposed updates to the Landfill gas (generation) method will encourage landfill operators to further maximise this energy recovery and emissions reduction potential. As such, it represents a positive development for industry and the environment that will enable the landfill sector to continue contributing to Australia's international climate change mitigation targets under the Paris Agreement.

¹ Clean Energy Regulator

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As such, WMRR supports the 2021 determination of the Landfill gas (generation) method of carbon abatement in its current form.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'G Sloan', positioned below the 'Yours sincerely' text.

Gayle Sloan
Chief Executive Officer
Waste Management and Resource Recovery Association of Australia