



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

4 October 2024

Dear Mr Fredericks

Re: WMRR support for the Exposure Draft proposing an amendment to the Carbon Credits (Carbon Farming Initiative) Rule 2015

Thank you for the opportunity to comment on the proposed ACCU Scheme transparency changes put forward by the Department of Climate Change, Energy, the Environment and Water (DCCEEW). DCCEEW's Exposure Draft proposes an amendment to the Carbon Credits (Carbon Farming Initiative) Rule 2015, requiring the Clean Energy Regulator (CER) to publish additional ACCU Scheme project data and information on the CER's website. It is hoped that these changes will strengthen transparency of the Australian Carbon Credit Unit (ACCU) Scheme and help further build public trust in the ACCU Scheme as recommended by the 2022 Independent Review of ACCUs.

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 2,290 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 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 WARR approach and the development of a circular economy, WMRR strongly advocates for a systems-based approach to managing materials in Australia. This includes fierce advocacy of 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.

WMRR acknowledges the important role that the existing ACCU scheme has played in reducing the WARR sector's carbon emissions by helping abatement projects become economically viable. In particular, the current landfill gas (LFG) methodology has played a significant role in promoting the capture and combustion of LFG, reducing the carbon footprint of existing landfill by incentivising more extensive gas capture in those instances where landfill cannot be avoided.

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However, it is generally noted within the WARR industry that the approved methodologies for carbon capture and abatement calculations can be complex. Recently WMRR has been intimately involved in discussions around the review of the LFG methodology, which has highlighted the industry's mixed levels of understanding around the calculations for the baseline and capture rates, and the resulting impacts of altering the calculations in an effort to reduce emissions over the near to medium term. This can impact industry forecasting and the perceived viability of future projects. The proposed amendment will undoubtedly assist the WARR industry in gaining a stronger understanding of the scheme by enabling transparency over existing projects, which should lead to more certainty around baseline assumptions (such as of the LFG capture rate) in the absence of a project.

Publishing additional project-level information is likely to improve public trust and confidence in the scheme by allowing communities and carbon market stakeholders to assess, understand and manage potential project impacts and opportunities more effectively. It is WMRR's view any initiatives which can increase general understanding and appreciation of the moving parts within both the WARR industry and interconnectivity with the circular economy will positively impact Australia's efforts to promote the values of the waste and resource management hierarchy, avoiding the creation of waste where possible and preferring recovery of valuable resources above disposal. Where landfill cannot be avoided, it is crucial that WARR industry is encouraged to mitigate the impacts of this activity and minimise carbon emissions in so far as possible by having a transparent ACCU scheme in place that provides certainty for industry and the community.

As such, it follows that WMRR supports the Exposure Draft. It is hoped that improving the scheme's transparency will promote better understanding amongst the WARR industry of the scheme's application of ACCUs so that the financial incentives of carbon abatement activities can be fully realised and result in the further reduction of the WARR industry's carbon emissions.

Please do not hesitate to contact the undersigned if you would like to discuss WMRR's submission.

Yours sincerely

Gayle Sloan

Chief Executive Officer

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