



Mr Mike Kaiser
Secretary
Department of Climate Change, Energy, the Environment and Water
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Submission via [online portal](#)

8 May 2026

Dear Mr Kaiser

Re: 2026 National Greenhouse and Energy Reporting (NGER) Scheme Updates

Thank you for the opportunity to provide feedback to the Department of Climate Change, Environment, Energy and Waste (DCCEEW) on the [2026 National Greenhouse and Energy Reporting \(NGER\) Scheme Updates](#) which include proposed amendments to the NGER scheme legislation for emissions of methane released from landfills. The Waste Management and Resource Recovery Association of Australia (WMRR) as the national peak body representing Australia's \$21 billion waste and resource recovery (WARR) sector, represents over 2,300 members across more than 380 organisations, spanning industry, government, research institutions and NGOs. Our sector plays a critical role in Australia's economy through infrastructure delivery, collection, resource recovery, manufacturing of secondary materials, energy recovery, and community engagement. Central to our advocacy is the connection between carbon reduction and the transition to a circular economy. By prioritising waste avoidance and the recovery and reuse of materials, the WARR sector extends material life, reduces reliance on virgin resources, and delivers significant emissions reductions while supporting jobs and economic resilience.

According to research undertaken by WMRR¹, the WARR sector – which is considered separately within the national greenhouse inventory – accounted for 10.8 Mt CO₂-e emissions, or 2.4% of Australia's total emissions in 2022-23. Landfill is the dominant source (10.5 Mt CO₂-e) due to methane emitted from the anaerobic decay of organic material. Waste emissions have declined considerably as combustion of landfill methane became common but have stabilized over the last decade or so, heralding the need for carbon policy tweaks that may help shift this plateau and encourage further emissions reduction activities. The NGERS Scheme plays a significant role in landfill operations, underpinning other schemes (such as the Australian Carbon Credit Unit (ACCU) scheme and the Safeguard Mechanism), corporate sustainability reporting requirements, regulatory oversight (such as jurisdictional climate change requirements) and carbon policy (such as Net Zero) which can drive operational and investment decisions.

WMRR understands that the reforms proposed to NGERS for landfills are designed to facilitate more accurate and site-specific emissions measurements cognisant of emissions measurement technology upgrades and technical expertise already existing within landfill operations in the reformed Method 2, as well as waste composition changes for those choosing to apply Method 1. It follows that WMRR broadly supports the proposed reforms which should facilitate

¹ *The State of the Waste and Resource Recovery Sector* report will be published by WMRR in mid-2026.

improvements in the accuracy and transparency of emissions monitoring for the WARR sector and encourage further investment in emissions reduction and abatement technologies. We have included further comments against each of the landfill methods below:

i. Proposed updates to Division 5.2.2 Method 1 – updates to estimation of emissions of methane released from landfills

Method 1 relies on default decay rates and methane generation potential, assuming a ‘typical landfill’ behaviour. Given the lack of site specificity in the method, Section 5.11 proposes much needed updates to waste composition defaults for municipal solid waste (MSW) Class 1, MSW Class II and Commercial and Industrial Waste – given these had not been reviewed since 2014. In WMRR’s view, current defaults do not adequately reflect FOGO diversion and variations in organic content across sites. Whilst the proposed default figures are based on 2025 data, WMRR submits that future reviews should also consider a MSW ‘Class III’ composition for Food Organics and Garden Organics (FOGO) given the national target to halve organics waste to landfill by 2030. Ideally, sites with lower organics should be able to reflect reduced emissions from changed waste streams.

Section 5.12 corrects the degradable organic carbon (DOCf) for wood from 0.23 to 0.10, to align with the National Greenhouse Accounts Factors and the National Inventory. This is also a much-needed change to ensure consistency across national emissions monitoring frameworks.

WMRR supports these amendments to Method 1 to help improve data accuracy.

ii. Proposed updates to Division 5.2.3 Method 2 – updates to estimation of emissions of methane released from landfills

WMRR strongly supports the proposed updates to Method 2 for landfill methane emissions which reflect a clear shift toward measurement-based approaches, improving alignment between reported emissions and actual site performance. The revised Method 2 process involves developing a structured, measurement-based approach to estimating landfill methane emissions. It begins with preparing a site plan and defining sub-facility zones with similar characteristics, then selecting representative zones within each for detailed analysis, verified by an independent expert. Methane collection and uncollected emissions are assessed within these zones, supported by walkover or scanning surveys to identify emission hotspots. Flux boxes or chambers are deployed in elevated emission areas to measure methane flows, which are combined with default values for low-emission areas to calculate total methane flow. These measurements are then used to iteratively calibrate methane generation constants, which are ultimately applied in the FOD model to estimate overall site emissions.

WMRR notes however that prescribed transect spacing is one means of achieving improved survey resolution and supports an approach that allows for equivalent outcomes to be demonstrated through alternative survey methodologies were supported by appropriate evidence. Further WMRR also encourages consideration of more frequent, ideally annual, survey intervals, noting that this would better capture temporal variability in landfill emissions, strengthen the integrity of emissions reduction and reporting under the Safeguard Mechanism through conservative policymaking, and improve alignment with emerging international frameworks that require annual methane measurement, monitoring, reporting and verification.

In particular, WMRR supports:

- *Removal of the Collection Efficiency Limit (CEL) from Method 2* —addressing concerns it discouraged methane capture. This complements the goal of Method 2 to provide site-specific parameters which may include emerging and improved gas capture technologies. The removal of the CEL is expected to encourage greater recovery and utilisation of landfill gas, thereby encouraging site specific technology investment. `
- *Greater use of site-specific measurement and calibration -which recognises that there are multiple technology platforms suitable for detection.* The updated approach introduces more rigorous, measurement-based requirements, including quarterly monitoring, clearer site modelling rules, mandatory use of representative zones, and recalibration of methane generation factors. S17.F proposes detection methods for the scanning survey with reduced thresholds (50 ppm to 25 ppm), simplified emissions categories to 'low' and 'elevated', new kg/hr detection metrics, and increased survey resolution (transects reduced to ≤ 4 m). Areas identified to have elevated methane emissions during a scanning survey will be required to be quantified using a flux box or chamber survey, with the reduced ppm threshold reflecting improved precision of newer detection technologies. This clearer methodology that facilitates the use of improved emissions measurement technologies has been sought by the landfill industry, and this reform is welcomed.
- *Introduction 'suitably qualified persons' to replace activities currently restricted to an 'independent expert'.* Expanding who can undertake measurement activities has the ability to reduce costs and improve accessibility while maintaining appropriate levels of technical assurance. This also facilitates opportunities for more regular measurement activities at sites by landfill operators themselves, which should result in more accurate data from landfills.

In WMRR's view, these are welcome changes that should promote a shift in landfill emissions reporting toward more precise, technology-enabled measurement. Given Australia's targets to reduce emissions by 43% by 2030 (from 2005 levels), the intention of the Safeguard Mechanism to drive increased investment in low emissions technology, as well as Australia's desire to achieve Net Zero emissions by 2050 – these reforms are a positive step toward improving the accuracy of Australia's carbon data and driving methane abatement and technology investment for landfills.

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

Yours sincerely



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