



Submission Template

Positive and Negative Lists for the Carbon Farming Initiative

Overview

This submission template should be used to provide comments on the Positive and Negative Lists for the Carbon Farming Initiative.

Contact Details

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Confidentiality

All submissions will be treated as public documents, unless the author of the submission clearly indicates the contrary by marking all or part of the submission as 'confidential'. Public submissions may be published in full on the Department of Climate Change and Energy Efficiency website, including any personal information of authors and/or other third parties contained in the submission. If any part of the submission should be treated as confidential then please provide two versions of the submission, one with the confidential information removed for publication.

A request made under the *Freedom of Information Act 1982* for access to a submission marked confidential will be determined in accordance with that Act.

Do you want this submission to be treated as confidential? No

Submission Instructions

Submissions should be made by **30 June**. The Department reserves the right not to consider late submissions.

Where possible, submissions should be lodged electronically, preferably in Microsoft Word or other text based formats, via the email address – CFI@climatechange.gov.au.

Submissions may alternatively be sent to the postal address below to arrive by the due date.

Land Sector Policy Section, Land Division
Department of Climate Change and Energy Efficiency
GPO Box 854
CANBERRA ACT 2601

Suggestions for the Positive List

The Municipal Waste Advisory Council (MWAC) appreciates the opportunity to comment on the Carbon Farming Initiative – Positive and Negative Lists for the Carbon Farming Initiative. This Submission has been prepared through the (MWAC) for the Western Australian Local Government Association (WALGA). MWAC is a standing committee of the WALGA, with delegated authority to represent the Association in all matters relating to solid waste management. MWAC's membership includes the major Regional Councils (waste management). The Regional Councils members of MWAC include the Eastern Metropolitan Regional Council, Mandarie Regional Council, Southern Metropolitan Regional Council, Rivers Regional Council, Western Metropolitan Regional Council and the City of Geraldton-Greenough. This makes MWAC a unique forum through which all the major Local Government waste management organisations cooperate. This Submission therefore represents the consolidated view of Western Australia Local Government. However, individual Local Governments and Regional Councils may have views that differ from the positions taken here. Due to the timeline for consultation MWAC has not yet considered this Submission, however, it will be put before the Council at the earliest opportunity. The Department will be informed of any changes to this Submission following consideration by MWAC.

The Association suggests the inclusion of **alternative waste treatment (AWT) processes** in the 'positive list'.

AWT processes are technologies that convert waste into energy or other useful products and provide an alternative to traditional landfilling. Although landfill has its place in the overall management of waste, there are alternative means of utilising waste as a resource and reducing the carbon impact of that material.

AWT can be placed into two broad categories, which include:

- Thermal treatment (incineration, gasification and pyrolysis); and
- Biological treatment (anaerobic and aerobic).

There are currently four biological AWT facilities in operation or commissioning in the Perth metropolitan area, with two more in the planning phase.

The Association recommends that crediting of diversion of putrescible waste from landfill via AWT facilities be included in the 'positive' list for the Carbon Farming Initiative. AWT facilities represent a significant financial investment for Local Government and industry, the absence of incentives (such as provided by the Carbon Farming Initiative) will limit the long term viability of current facilities and future investment in the development of new facilities. AWT was recognised under the *Greenhouse Friendly* Program as an activity which could generate offsets.

The Association recommends that AWT processes are included in the positive list as a way of ensuring that Local Governments who have taken the initiative to reduce their carbon impact and divert waste from landfill are not disadvantaged and to encourage the development of future AWT projects