



## Submission Template

### Carbon Farming Initiative methodology

#### Overview

This submission template should be used to provide comments on a draft methodology proposed under 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 **close of business** on the day the public consultation period closes for the methodology. This date will be specified on the website. 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 – [DOIC@climatechange.gov.au](mailto:DOIC@climatechange.gov.au).

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

DOIC Secretariat, Land Division  
Department of Climate Change and Energy Efficiency  
GPO Box 854  
CANBERRA ACT 2601

**Name of methodology:** *Draft methodology for the capture and combustion of landfill gas*

## **General/overall comments**

The Municipal Waste Advisory Council (MWAC) appreciates the opportunity to comment on the Carbon Farming Initiative – Draft methodology for the capture and combustion of landfill gas. 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.

Many Local Governments in Western Australia, through Regional Councils, are currently required through regulations to undertake landfill gas extraction. It is our understanding, therefore, that it will only be the smaller landfills (operated by non-metropolitan Local Governments) that will be affected by the Draft Methodology. The complexity of the proposed methodology is a concern to Local Government, particularly if those who will be applying the methodology are small Local Governments, potentially without the capacity to apply these calculations. These Local Governments will need assistance in order to make the most of these proposed offset. For the moment, it is proposed that examples be provided to illustrate the mechanics of the methodology in detail (for example, one example of a landfill with gas extraction and one without gas extraction).

***Recommendation: That the Domestic Offsets Integrity Committee (DOIC) provide examples of the application of the methodology to assist interpretation.***

In addition, MWAC is seeking confirmation that, if a better alternative methodology can be found, that Local Governments can apply separately to the Domestic Offsets Integrity Committee (DOIC) for approval.

***Recommendation: That the Domestic Offsets Integrity Committee (DOIC) confirms that alternative methodologies can be proposed if a better alternative is found.***

Overall, the Draft Methodology focuses only on capturing additionalities, which will result in only a small number of Local Governments being able to benefit from the proposed offsets. The majority of Local Governments in Western Australia are already required to undertake landfill gas extraction as part of their license conditions. There is a concern that Local Governments who have taken early steps to reduce emissions will be disadvantaged.

***Recommendation: That the Domestic Offsets Integrity Committee (DOIC) confirms that those parties who are currently undertaking emission reduction activities will not be disadvantaged.***