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## **SUBMISSION: TECHNICAL GUIDELINES FOR THE ESTIMATION OF GREENHOUSE EMISSIONS AND ENERGY AT THE FACILITY LEVEL – Energy, Industrial Process and Waste Sectors in Australia**

### **ATTENTION: Manager, Greenhouse Inventory Unit**

SITA is one of Australia's largest recyclers of waste and is also a major landfill operator.

SITA appreciates the opportunity to comment on the Technical Guidelines, but also recognises that the short consultation period has constrained the detail of the feedback we can offer. This submission is designed to be short, succinct and to the point.

SITA is strongly supportive of an ETS and the NGERs reporting.

SITA supports the general thrust of chapter 6 Waste to landfill methodology for emissions calculations but raises the following matters:

Opening stock will be very difficult to quantify for old and closed landfills as few records were kept in the past.

Many regional landfills still do not have weighbridges and SITA would support these being made mandatory to facilitate NGERs reporting.

The fraction of CH<sub>4</sub> can vary but 0.5 is a reasonable mid term estimate.

The decay model is a sensible mechanism for estimating emissions where actual quantified data is unavailable subject to the data limitations discussed above.

DOC may need to be separately regulated by EPA's if Waste remains an uncovered sector

Several European States have mandated that DOC can only be landfilled where it has been pre-treated and stabilised. Much is aerobically composted to avoid methane creation in landfills.

Mandated methane gas capture for all landfills over a certain threshold may need to be considered by EPA's if Waste remains an uncovered sector.

The Waste Management Association Landfill Division is reviewing continuous monitoring options and costs for emissions.

SITA notes and agrees that CO2 emissions from landfills are of biomass origin and therefore are not counted toward the emission footprint.

Capturing the embodied energy of materials through recycling is a significant option for energy efficiency gains at low marginal cost. The Technical Guidelines would benefit from a Table documenting the embodied energy of particular materials and commodities e.g. the average embodied energy of a tonne of aluminium, of aluminium can, of a PET 300 ml bottle etc. This would allow commercial trades in these commodities to explicitly recognise (and value) the embodied energy savings achieved through recovery from the waste stream.

SITA supports the option to use "higher order methods" where available.

Oxidation rates are the subject of the AACAP project being supported by WMAA which should clarify the 0.1% default factor.

SITA does not yet have enough information to comment on the proposed Emission Factor ratings and Class ratings etc (within the short consultation period) and looks forward to more detailed discussion on these points.

SITA would appreciate the opportunity to meet with the Technical Guidelines team to discuss the detail of the points made above.

Yours faithfully,



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