

3 October 2025

Manager, Climate Change Policy
NSW Environment Protection Authority

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Submission: NSW EPA Proposed Climate Change Requirements for Landfill Licensees

Thank you for the opportunity to comment on the NSW EPA Proposed Climate Change Requirements for landfill licensees. Bathurst Regional Council operates the Bathurst Waste Management Centre on College Road which incorporates a landfill that has been operating since 1974. Council has been consulting with the Central NSW Joint Organisation (CNSWJO) on the proposed new Climate Change related reporting requirements. Council fully supports the submission made by CNSWJO.

Bathurst Regional Council adopted an organisation wide Emissions Reduction Plan (ERP) in 2022, with emissions reduction targets of:

- 25% reduction in greenhouse gas emissions over baseline FY 2019 emissions by 2025
- 60% reduction in greenhouse gas emissions over baseline FY 2019 emissions by 2035
- Net zero emissions by 2050

In Council's baseline year FY 2019, landfill emissions comprised 65 percent of total emissions. Emissions reduction targets were derived from specific identified projects which together would allow Council to meet the proposed targets. Upgrading the gas capture and flaring system at the Bathurst Waste Management Centre was a key project identified in the ERP.

In 2023 Council engaged LGI Limited to design, construct, operate and maintain a new landfill gas collection system (LFGCS). Stage 1 of the project installed 38 new extraction wells and a compliant enclosed flare to safely combust methane, with future expansions planned for 2025, 2027 and 2029. The new LFGCS was commissioned on 21 March 2024.

Prior to the commissioning of the new LFGCS the landfill emitted more than the proposed 25,000tCO₂e threshold of reporting, as determined by the NGERs solid waste calculator. In the first full year of the LFGCS system being operational (FY2025) estimated net emissions (after flaring) were 13,968tCO₂e, well below the proposed reporting threshold.

The consultation draft proposes that the new reporting requirements will apply to any premises that emits 25,000 tonnes or more of scope 1 and scope 2 emissions of carbon dioxide equivalent (CO₂-e) per year in any year over the previous three financial years.

Reference: TP:AD: 13.00007

Enquiries: [REDACTED]

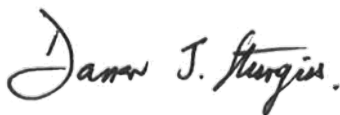
Given that it is highly unlikely that the Bathurst landfill will exceed the threshold in future years due to operation of the LFGCS and planned future expansion of the system, Council will be captured by the reporting requirement even though the landfill no longer meets the threshold for reporting.

Council provides the following comments:

- Bathurst Regional Council supports the intent of reporting on net emissions rather than gross emissions.
- The trigger for being captured by the reporting obligation should include an exception for landfills which, while exceeding the threshold in any of the three preceding years, have since commissioned a LFGCS which takes the facility under the reporting threshold.
- Alternatively, if such facilities are captured under the three year preceding rule, then a time limit on reporting should be established if a facility continues to demonstrate it is under the reporting threshold.
- Council requests that written guidance be provided on whether ACCUs generated (whether held, retired or sold) are included in the reporting threshold calculation.
- The requirement to prepare a CCMAP is onerous and costly for a facility which no longer triggers the threshold.
- If required to prepare a CCMAP Council would seek EPA support and funding for its preparation. Provision of a template CCMAP would be a useful tool in this regard.

Should you have any queries regarding this submission, please contact [REDACTED]

Yours faithfully



Darren Sturgiss
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ENGINEERING SERVICES