

Dear Sir/Madam,

MRA response to Draft Climate Change Policy and Action Plan:

1. MRA welcomes the draft documents and congratulates the NSW Government on the initiative.
2. Whilst we understand the political dynamics of climate change, MRA believes the Policy and Action Plan proposals are insufficient to drive rapid decarbonisation of the economy.
3. MRA believes much more strategic intervention is required including regulatory and price interventions
4. The requirement for licenced facilities to prepare a CCMAP is welcomed.
5. The action around waste management (which is MRA's specialist expertise), is insufficient.
6. The Warnken ISE / SITA report of 2007 (attached) provided a roadmap for decarbonisation of the waste sector nationally. Actions included:
 - a. Diversion of organics from landfill
 - b. Mandated capture of landfill gas from existing landfill stocks
 - c. Energy from Waste
 - d. Capturing the embodied energy of materials through better recycling
 - e. Conversion of the waste vehicle fleet to biodiesel.

The first 4 actions represent a 10% reduction in Australia-wide emissions. That same percentage would be applied to NSW. Unfortunately, the Draft Climate Change Policy and Action Plan only considers the diversion of organics from landfill (in passing) and does not address itself to:

- Mandated capture of landfill gas from existing landfill stocks
- Energy from Waste
- Capturing the embodied energy of materials through better recycling.

This is a considerable oversight and a weakness in the Policy since these are easy to achieve, 'no regrets' and relatively cheap abatement options.

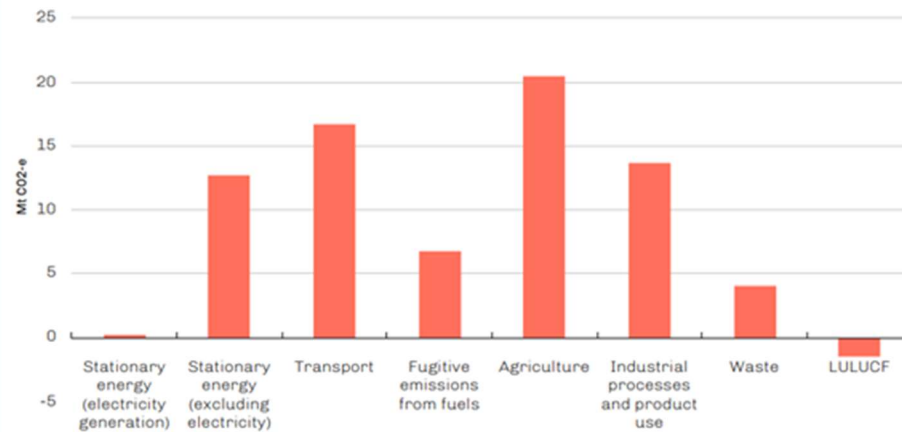
7. The Policy and Action Plan appears to have errors in respect of direct landfill emissions abatement.
 - a. Fig 2 below shows current direct emissions from landfill at 5MT
 - b. Fig 4 below shows the predicted emissions in 2050 at 4.8 MT and
 - c. Fig A3 shows a what appears to be a 20-30% reduction in emissions from 2020 to 2030 and constant thereafter to 2050.
8. MRA believes the Government should set a higher aspiration for direct landfill emissions reduction in NSW, to net zero by 2030 by considering:
 - a. Mandating gas capture and flaring on all landfills with > 5000tCO₂e/yr emissions by 2030 with offsets requirements for any fugitive emissions;
 - b. Requiring smaller landfill operators (<5000tCO₂e/yr) to offset their emissions;
 - c. Banning commercial organics to landfill by 2027 (ie expanding on, and extending the requirement for large businesses to have a Food Collection Service by 2025)

- d. Mandating Councils introduce FOGO services by 2027 unless they have specific contractual obligations not to; (ie bringing forward the 2030 FOGO mandate)
9. The Government should set a higher aspiration for reducing emissions associated with waste/resource recovery by considering:
 - a. Expanding Energy from Waste options beyond the 4 approved Special Activation Precincts
 - b. Capturing the embodied energy of materials through better recycling by:
 - i. Progressively increasing the landfill levy to drive resource recovery and waste processing infrastructure investment and development;
 - ii. Providing Landfill Levy rebates to bona-fide recycling facilities to accelerate expansion and capture of additional streams;
 - iii. Accelerating Planning Approvals for waste infrastructure (e.g. by developing a Waste SEPP or hatching “preferencing” waste processing infrastructure in particular areas of the IN1 zone)
 - iv. Mandating minimum recycled content rules in packaging, government purchasing and civil infrastructure;
 - v. Extending the Container Deposit Refund to 20c to capture wasted containers.
 10. MRA would be pleased to expand on these matters, if requested.

Figure 2. NSW greenhouse gas emissions (2018–19) and description of coverage by the EPA's regulatory remit

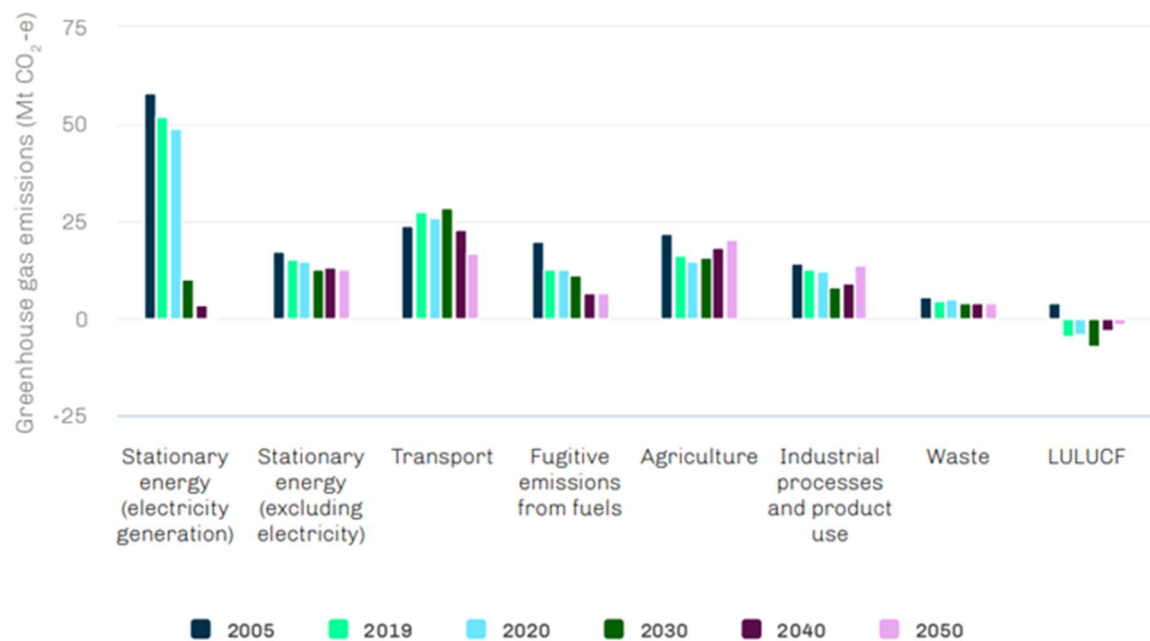
Sector *	Description	Total NSW emissions (% of total NSW emissions) **	Activities in this sector that are covered by the EPA's regulatory remit
 Stationary energy (electricity generation)	Emissions from the combustion of fossil fuels for electricity generation	52 Mt (38%)	The EPA is responsible for regulating larger electricity generation activities that generate almost all of these emissions (e.g. coal-fired power stations). Local councils are generally responsible for regulating smaller activities, which typically have much lower emissions.
 Stationary energy (excluding electricity generation)	Emissions from on-site fossil fuel combustion (e.g. to run boilers and furnaces) used in manufacturing and other activities	15 Mt (11%)	The EPA is responsible for regulating larger industrial activities that generate most of these emissions (e.g. metallurgy). Local councils generally regulate smaller premises that use on-site stationary energy (e.g. some commercial, residential and smaller industrial premises).
 Transport	Includes fossil fuel combustion emissions for use in transport activities (e.g. on-road vehicles, rail, domestic aviation and domestic shipping)	28 Mt (20%)	While some operators that the EPA regulates use on-road vehicles or rail rolling stock, emissions from these account for a very small proportion of total transport sector emissions.
 Agriculture	Includes emissions of methane and nitrous oxide from livestock, crops, and agricultural and forest soils	16 Mt (12%)	Most agricultural emissions are methane emissions from ruminant animals (mainly cattle and sheep). These animals are predominantly kept on grazing land, which is not within the EPA's remit. Some of these emissions are from livestock-intensive activities (e.g. feedlots), which the EPA does regulate.
 Fugitive emissions	Emissions from the extraction and distribution of coal and natural gas	13 Mt (9%)	In NSW fugitive emissions are mainly from coal and gas extraction activities, which are almost all regulated by the EPA (e.g. coal mines).
 Industrial processes and product use	Emissions from chemical and/or physical transformation of materials, and consumption of synthetic greenhouse gases	13 Mt (9%)	The EPA is responsible for regulating larger industrial premises that generate most of these emissions (e.g. chemical production). Local councils are generally responsible for regulating smaller activities; however, these typically have much lower emissions.
 Waste	Emissions due to waste disposal, treatment and processing, including domestic and industrial wastewater	5 Mt (4%)	Almost all waste activities are regulated by the EPA (e.g. landfills, sewage treatment plants).
 Land use, land-use change and forestry	Emissions due to land use, land-use change and forestry can either be an emission source (positive emissions) or sink (negative emissions)	5 Mt (-3%)	EPA has a role in regulating some forestry activities (e.g. native forestry).

Figure 4. Projected NSW emissions in 2050 by sector, with current Net Zero Plan Stage 1 policies implemented (based on UNFCCC key categories)



Source: Adapted from Figure 23.6, 2021 SoE report **Note:** LULUCF = Land-use, land use change and forestry

Figure A3. Inventoried and projected NSW emissions by sector with current Net Zero Plan Stage 1 policies implemented, 2005–50 (based on UNFCCC key categories)



Kind regards

Mike



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