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Department of Climate Change, Energy, the Environment and Water

EMISSIONS REDUCTION ASSURANCE COMMITTEE

Review of the Alternative Waste Treatment Method

Consultation paper

Emissions Reduction Assurance Committee (ERAC)

November 2024

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Acknowledgement of Country

We acknowledge the Traditional Owners of Country throughout Australia and recognise their continuing connection to land, waters and culture. We pay our respects to their Elders past and present.

Alternative Waste Treatment – Periodic review: Have your say

The Emissions Reduction Assurance Committee (Committee) is seeking feedback on the ACCU Scheme *Carbon Credits (Carbon Farming Initiative– Alternative Waste Treatment) Methodology Determination 2015* (the AWT method) compliance with the Offset Integrity Standards as set out in the *Carbon Credits (Carbon Farming Initiative) Act 2011* (the Act) and associated matters including outstanding issues identified in previous reviews but not yet actioned.

This will inform the Committee's advice to the Minister for Climate Change and Energy on whether the method should be remade.

To have your say:

- Read the consultation paper
- Provide a written submission via our Have Your Say portal.

The Department of Climate Change, Energy, the Environment and Water (the department) will host an online information session on this consultation paper on **26 November 2024**. You can register for this session on the Have Your Say website.

Submissions are welcome until **11:59pm AEDT on Monday, 2 December 2024**

If you have questions about the consultation process or would like to request an extension, please contact the Emissions Reduction Assurance Committee Secretariat at ACCUSecretariat@dcceew.gov.au.

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The Have Your Say portal will ask you to indicate whether your submission is confidential. If you indicate your submission is confidential, it will not be published on the department's website, but will be provided to the:

- Emissions Reduction Assurance Committee
- Department of Climate Change, Energy, the Environment and Water
- Clean Energy Regulator.

If only a part of your submission is confidential, for example, because it contains a small amount of commercially sensitive information, you may wish to provide 2 clearly marked versions of the submission: a full version and one with the confidential information removed for publication.

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Contact information is collected for the purposes of identifying authors and in case we need to contact you regarding your submission. Contact information and other personal information contained in submissions may be used and disclosed within the department and to other persons for the purposes of the AWT method periodic review, other related purposes, and other required reasons under Australian law. Submissions may also be shared with the Clean Energy Regulator.

If you are making a submission which contains the personal information of another person, and you have not obtained the person's consent to their information being (i) included in your submission, and (ii) used and potentially published by the department for the purposes in this notice, then please de-identify or otherwise remove the personal information before providing your submission to the department.

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1 Introduction

The Australian Carbon Credit Unit (ACCU) Scheme plays an important role in helping the Australian Government achieve its legislated emissions reductions targets of a 43% reduction on 2005 levels by 2030 and net zero by 2050. Seventeen million ACCUs were issued in 2023, which corresponds to 17 million tonnes (Mt) of abatement. Since 2012, the ACCU Scheme has incentivised over 45Mt of abatement from the waste sector, around 30% of total credited abatement.[1]

1.1 Role of the Emissions Reduction Assurance Committee

The Emissions Reduction Assurance Committee (the Committee) is a statutory committee established under the *Carbon Credits (Carbon Farming Initiative) Act 2011* (the Act). The Committee's functions include conducting reviews of ACCU Scheme methods and undertaking public consultation to ensure the methods continue to comply with the Act's Offsets Integrity Standards contained in s133(1). These functions are set out in sections 255, 255AA, and 255A of the Act.

In accordance with its function for reviewing methods, the Committee is undertaking a periodic review of the *Carbon Credits (Carbon Farming Initiative— Alternative Waste Treatment) Methodology Determination 2015*[2] (the AWT method) following a request received under s255AA of the Act to review this method. The request is in anticipation of the AWT method sunsetting on 1 April 2025.

1.2 The AWT method is due to sunset

ACCU Scheme methods are legislative instruments. Under the *Legislation Act 2003 (s 50(1))*, all legislative instruments sunset 10 years after they are made. In addition, ACCU methods contain a clause, which causes them to expire the day before they sunset. As a result, ACCU methods cannot be extended – they can either be left to expire or be remade as new methods.

The AWT method is due to expire on 31 March 2025. The expiry of the method has no impact on existing AWT projects as they can continue to earn ACCUs for the duration of their crediting period. However, no new projects can be registered under the method after it expires. Stakeholders interested in carrying out new projects under the expiring method may be concerned about losing the opportunity to do so.

1.3 Scope of the review

The Committee is reviewing the AWT method to decide whether the method should be remade or left to expire. In its review, the Committee is considering factors such as current and likely future

[1] ACCU project and contract register | Clean Energy Regulator (cer.gov.au)

[2] Carbon Credits (Carbon Farming Initiative—Alternative Waste Treatment) Methodology Determination 2015

project uptake, abatement potential, whether the activities could be undertaken under another method, and any significant integrity concerns with the AWT method. The outcome of this review could be one of the following options, that the AWT method:

- meets the Offsets Integrity Standards in its current form, is fit-for-purpose and should be replaced with a new method substantially the same
- should be replaced with substantial changes
- should be left to expire without being replaced.

The Committee will use this public consultation to gather feedback on several outstanding integrity issues identified in previous reviews. Those issues include outdated landfill gas capture rates and concerns with the composting activity. The insights gained from this consultation will inform potential revisions to the new AWT method, should the method be remade.

The Committee is also interested in whether any changes should be made to the method to improve the implementation and operation of AWT projects. Additional considerations that the Committee is seeking feedback on are set out in section 3. Feedback on any adverse social, environmental, and economic outcomes that may result from AWT projects is also welcomed.

Offsets Integrity Standards

ACCU Scheme methods must comply with a set of standards known as the Offsets Integrity Standards, which are contained in s133 of the Act. In conducting this review, the Committee will assess whether the method aligns with the Offsets Integrity Standards should it be remade. The assessment against the Offsets Integrity Standards considers developments in the industry, advancements in technology, and changes in state and territory regulations and policy settings.

The purpose of the Offsets Integrity Standards is to ensure abatement credited by a method is genuine and additional to what would occur through business-as-usual practices. Table 1 summarises the Offsets Integrity Standards.

Table 1 Offsets Integrity Standards

Offsets Integrity Standards	Statutory reference	Description
Additionality	133(1)(a)	Projects covered by the determination should result in abatement that is unlikely to occur in the ordinary course of events (i.e. unlikely to occur in the absence of the incentive provided by the scheme).
Measurement and verification	133(1)(b)	Removals, reductions and emissions covered by the determination are measurable and capable of being verified.
Eligible carbon abatement	133(1)(c)	Abatement accredited under the determination is ‘eligible carbon abatement’ (abatement due to the project that can be used to meet Australia’s international mitigation obligations).
Evidence	133(1)(d)	The method is supported by clear and convincing evidence.

Offsets Integrity Standards	Statutory reference	Description
Project emissions and leakage	133(1)(e)	The method provides for deductions of material emissions that occur as a direct result of the conduct of projects.
Conservativism	133(1)(g)	All estimates, projections or assumptions in the determination are conservative.
Legislative rules	133(1)(h)	The determination satisfies any applicable legislative rules.

Additional considerations

While the AWT method's compliance with the Offsets Integrity Standards will be the focus of the review, the Committee will consider other issues associated with its operations, including:

- the transaction costs associated with its application
- its effectiveness in measuring and rewarding genuine abatement
- the ease of administration and enforcement
- consistency with other ACCU Scheme methods
- the positive and negative broader environmental, social and economic impacts of projects.

1.4 Sources of information

The Alternative Waste Treatment (AWT) method

- Methodology determination 2015
- Explanatory statement 2015
- The department- AWT method
- Clean Energy Regulator – AWT method

ACCU Scheme legislative framework

- Carbon Credits (Carbon Farming Initiative) Act 2011
- Carbon Credits (Carbon Farming Initiative) Rule 2015

The Committee's advice to the Minister on making of the method

The Committee's advice to the Minister on making the method in 2015

2 Overview of the AWT method

2.1 History of the AWT Method

Development of the AWT method included collaboration with a technical working group of waste industry experts and the Clean Energy Regulator. The AWT method combined 4 previous methods developed under the Carbon Farming Initiative.[3]

The Committee reviewed the AWT method in 2019/2020 (a combined periodic review and crediting period extension review). Following a public consultation in December 2019 and a request of project level financial data from AWT project proponents in October 2020, the Committee recommended that the crediting period for projects under the AWT method should not be extended.[4,5]

An AWT (biomethane) variation method was drafted in 2022. The proposed changes in the method variation were to include biomethane as a new activity and remove composting as an eligible activity. A public consultation on the draft variation was undertaken in March/April 2022, but the method variation was not considered by the Committee.

In late 2022, the Committee sought submissions on updating the landfill gas capture rate and including emissions from the end-management of digestate in the AWT method through a targeted consultation process. The outcome of that consultation has not yet been incorporated into the AWT method.

2.2 Eligible activities under the AWT method

The method credits the avoided methane emissions from decomposition of organic waste in landfills by diverting mixed solid waste otherwise destined for landfill through AWT facilities. The AWT method allows 3 types of processing of the waste diverted from landfill:

- enclosed composting
- one or more anaerobic digesters and the transfer of biogas to a combustion device for destruction

[3] Carbon Credits (Carbon Farming Initiative) (Diversion of Legacy Waste to an Alternative Waste Treatment Facility) Methodology Determination 2013; Carbon Credits (Carbon Farming Initiative) (Enclosed Mechanical Processing and Composting Alternative Waste Treatment) Methodology Determination 2013; Carbon Credits (Carbon Farming Initiative) (Avoided Emissions from Diverting Legacy Waste from Landfill for Process Engineered Fuel Manufacture) Methodology Determination 2012; Carbon Credits (Carbon Farming Initiative) (Avoided Emissions from Diverting Legacy Waste Through a Composting Alternative Waste Technology) Methodology Determination 2013

[4] Committee letter of advice to the Minister regarding the Alternative Waste Treatment crediting period extension review

[5] Alternative waste treatment method crediting period extension review report

- process engineered fuel manufacture.

The eligible waste streams under the method are:

- municipal solid waste
- construction and demolition waste
- commercial and industrial waste.

These mixed waste streams are not separated at their source and normally go straight to landfill. Activities that process waste streams separated at the source are covered by the *Carbon Credits (Carbon Farming Initiative – Source Separated Organic Waste) Methodology Determination 2016*[6].

There are 3 types of projects under the AWT method:

- new projects – constructing a new AWT facility to process eligible waste that would have gone to landfill and uses eligible waste treatment technology
- expansion projects – increasing the capacity of eligible waste an existing AWT facility is able to process, or
- transitioning projects – eligible offsets project covered by one of the 4 predecessor AWT determinations prior to the commencement day of the current method.

2.3 Calculating abatement

Abatement for a reporting period is calculated as baseline emissions minus the project emissions. Baseline emissions relate to the methane emissions from the organic component of eligible waste that would have been disposed in landfill in the absence of the project. The baseline calculations in the AWT method account for the oxidation of methane in the near-surface aerobic conditions of the landfill and landfill gas capture on waste disposal sites.

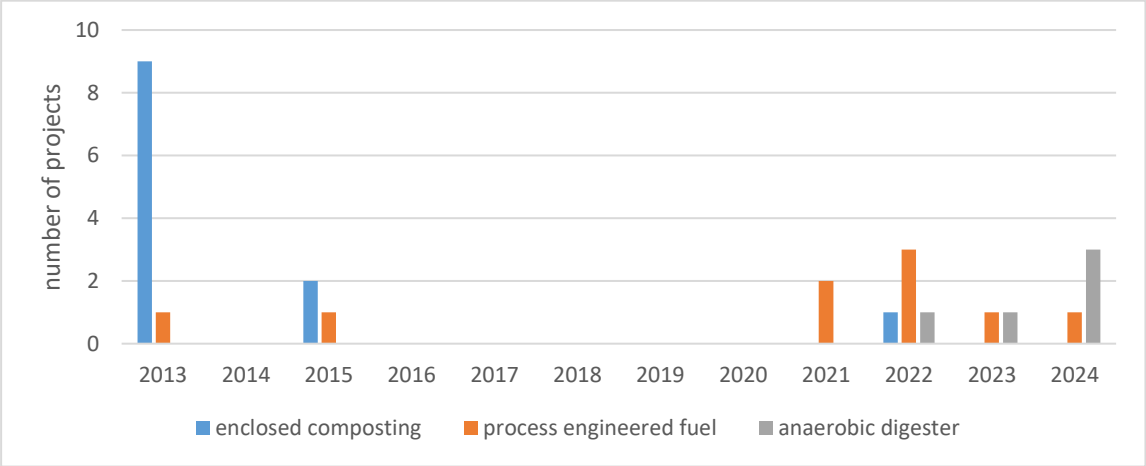
Project emissions include emissions generated from the processing of waste, purchased electricity and fuel use.

2.4 Uptake

Since the AWT method was made on 12 January 2015, 32 projects have been registered, 6 of which have been revoked. Figure 1 shows the project registration based on the activity type over the life of the method. Projects under the method have generated around 4.9 million ACCUs to date, with 379,387 ACCUs delivered in the 2023-24 financial year. More information about projects registered under the ACCU Scheme can be found on the Clean Energy Regulator website.

[6] Carbon Credits (Carbon Farming Initiative—Source Separated Organic Waste) Methodology Determination 2016

Figure 1 Number of projects registered under AWT method, excluding revoked projects



3 Feedback sought from stakeholders

To assist its review, the Committee welcomes submissions from stakeholders on any matters within the scope of the review. While the primary focus of this review and public consultation is to determine whether the AWT method continues to meet the Offsets Integrity Standards and can be remade, the Committee would also like to use this public consultation to gather feedback and data on several outstanding issues associated with the method identified in previous reviews but not yet actioned. The Committee also welcomes submissions on any other issues stakeholders would like to raise in this review of the AWT method. The insights gained from this consultation will inform potential revisions to the new AWT method, should a decision to remake the method is made.

3.1 Assessment against the Offsets Integrity Standards

This section outlines elements of the method designed to meet the Offsets Integrity Standards (Table 1), and issues stakeholders may like to consider in their submissions to the review of the method.

Additionality: A method should result in carbon abatement that is unlikely to occur in the ordinary course of events (disregarding the effect of the Act)

At the time the AWT method was made, the Committee assessed the method as specifying appropriate requirements to ensure projects would deliver additional abatement. This included that the method only applies to new, expansion and transitioning projects and required baselines to be calculated on a conservative basis taking into account landfill gas collection and destruction regulation in the states or territories.

The Committee welcomes views on: the impact of regulatory and other changes since 2015 that may influence the additionality of new projects under the method (Question 1)

Measurable and verifiable: Estimates of abatement should be measurable and capable of being verified

At the time the method was made, the Committee assessed the method as specifying appropriate equations for calculating emissions reductions and project emissions. Further, that the AWT method also specified appropriate techniques for data collection, monitoring and reporting to verify these estimations.

The Committee welcomes views, including any supporting examples, on: whether method provisions for measuring and verifying abatement estimates are fit for purpose. Are there material changes in emissions that should be accounted for in the method? (Question 2)

Eligible carbon abatement: A method should provide abatement that is able to be used to meet Australia's international mitigation obligations

At the time the method was made, the department advised the Committee that the carbon abatement used in ascertaining the abatement amount in the method was eligible carbon abatement.

The Committee welcomes views, including evidence, on: whether changes to the method should be made with respect to eligible carbon abatement that can be counted in Australia's National Greenhouse Accounts (Question 3)

Evidence-based: A method should be supported by clear and convincing evidence

At the time the AWT method was made, the Committee assessed it as being supported by clear and convincing evidence.

The Committee welcomes views on: whether there is new or different evidence on the emissions reduction arising from alternative waste treatment that should be considered in this review (Question 4)

Project emissions: Material greenhouse gas emissions emitted as a direct result of the project should be deducted

At the time the AWT method was made, the Committee assessed the equations that calculate net abatement by deducting material emissions generated as a direct result of carrying out project activities as complying with this Offsets Integrity Standard.

The Committee welcomes views, including any supporting examples, on: whether the method sufficiently accounts for material greenhouse gas emissions directly resulting from carrying out the project (Question 5)

Conservative: Where a method involves an estimate, projection or assumption, it should be conservative

At the time the AWT method was made, the Committee assessed the assumptions and estimates as being conservative.

The Committee welcomes views, including supporting examples, on: whether the inputs and variables used in the method's abatement equations remain conservative (Question 6)

3.2 Updating the landfill gas capture rate

Calculation of baseline emissions in the AWT method incorporates average capture rates for methane emissions from landfill for each state. The method assumes that in the absence of an AWT project, the proponent would be directing the waste to landfill. The average percentage of landfill gas captured in the applicable state or territory estimates the amount of landfill gas capture that would have occurred if waste had been sent to landfill.

Projects are required to use the landfill gas capture rate values in force in the method at the time the project commences and retain the value for their crediting period. The current capture rate values in the AWT method are based on data from the National Inventory Report 2012 and have not been updated since the method was made in 2015.

Analysis indicates that changing the capture rates would have a material impact on net abatement in the AWT method. However, there is a concern that if the capture rates are not updated, the AWT method may not be conservative. The Committee is seeking feedback on whether the landfill gas capture rates should be updated if a new AWT method is made.

The Committee proposes 2 options for updating the landfill gas capture rate in the new AWT method: state-based or national-based.

3.2.1 State-based landfill gas capture rate

This option proposes to use a 5-year average of landfill gas captured in the state[7] where the project operates, based on the most recent data. Capture rates in each Australian jurisdiction can fluctuate significantly from year to year (see Table 2). Using a 5-year average would help smooth out these interannual variations. The latest data from Australia's National Greenhouse Accounts would be used for this calculation and the values would be updated regularly.

Table 2 shows the capture rate values in the AWT method versus the most recent capture rates from Australia's National Greenhouse Accounts. Table 2 also shows the 5-year average capture rates, which is proposed to be used in the new method, should it be remade. Data for the Northern Territory (NT) and Australian Capital Territory (ACT) is not published on commercial-in-confidence grounds. While there are currently no projects registered under the AWT method in the ACT or NT, this might be an issue in the future.

Table 2 State-based landfill gas capture rates

Current AWT method (%)			New data (%)					
State or Territory	**Rate for transitioning projects**	**Rate for other AWT projects**	**2018**	**2019**	**2020**	**2021**	**2022**	**5-year average (2018-22)**
New South Wales	24	37	42	48	46	43	39	44
Victoria	32	45	64	58	57	59	50	58
Queensland	16	30	34	33	33	42	48	38
Western Australia	27	30	45	29	31	28	30	33
South Australia	29	29	40	30	45	40	34	38
Tasmania	33	39	41	29	37	41	41	38
Australian Capital Territory	47	66						
Northern Territory	25	18						

3.2.2 National-based landfill gas capture rate (preferred option)

This option proposes to use a 5-year average of landfill gas captured in Australia based on the most recent data. Table 3 shows national-based capture rates over 2014 to 2022 period. The 5-year average capture rate is 44%.

[7] Data for the Northern Territory or Australian Capital Territory is no longer published in line with the department's data publication policy on commercial-in-confidence and/or privacy matters.

The Committee's preferred option is to adopt the national-based capture rate. This approach simplifies the method by using the same capture rate for all AWT projects. This approach resolves the issue of confidentiality that prevents the publication of capture rate data from the ACT and NT.

Since the fluctuations in national-based data have been small over the 2014-22 period (around 6.5%), if the capture rate data do not get updated in the future, there would be less concern with the conservativeness of the method (compared to using state-based data). It should be noted that projects under the Landfill Gas methods[8] use a default baseline factor of 30%, regardless of their location.

Table 3 National-based landfill gas capture rate

year	2014	2015	2016	2017	2018	2019	2020	2021	2022	5-year average
Average capture rate (%)	43	46	45	43	46	43	43	45	43	44

The Committee welcomes views on:

How you think the landfill gas capture rate should be updated? State-based or national-based. (Question 7)

Whether the gas capture rates proposed under both the State and national-based options are sufficiently conservative? (Question 8)

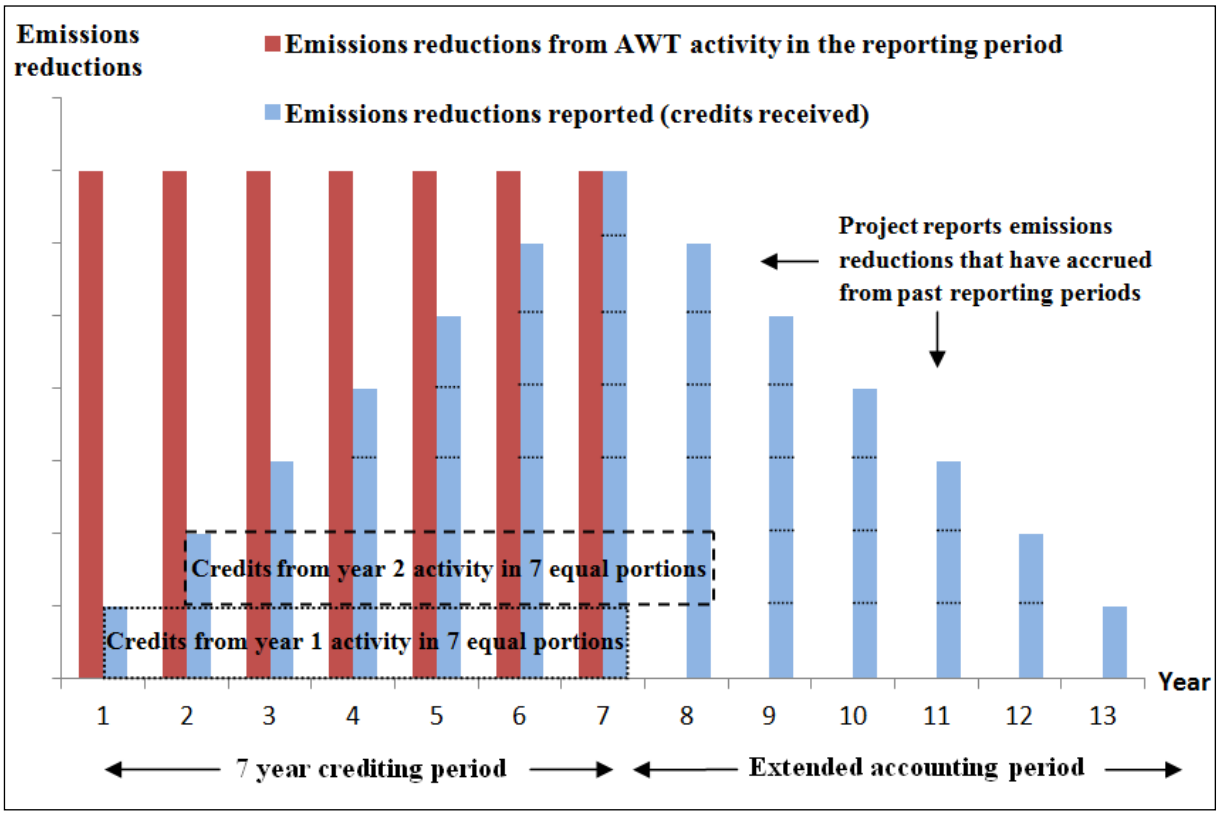
3.3 Crediting period

The AWT method provides the standard seven-year crediting period. However, credits from each year are divided into seven equal portions, with each portion awarded over each of the subsequent seven years. The reason for that is because emissions from landfill occur over a long period of time as the organic material in the waste breaks down.

As a result of crediting in equal portions over seven years, AWT projects have an extended accounting period. The result of the extended accounting period is that AWT projects will receive credits over a period of approximately 13 years. Figure 2 provides an example of crediting in seven equal portions and the extended accounting period.

[8] Carbon Credits (Carbon Farming Initiative—Electricity Generation from Landfill Gas) Methodology Determination 2021

Figure 2 An example of crediting an AWT project



An example of crediting an AWT project in 7 equal portions and the extended accounting period. Note: the example assumes equal reporting periods at 12-month intervals and that emissions reductions in each reporting period remain the same over the seven-year crediting period.

If the outcome of this review suggests that the AWT method should be remade, the crediting period of the new method could be made longer than the standard 7 years. Furthermore, there could be adjustments to the current extended accounting period and the 18-month limit on deferral of start of the crediting period (the deferral period).

In determining whether to extend the crediting period, the Committee must consider whether projects would continue to result in abatement that is unlikely to occur in the ordinary course of events (additional abatement) beyond the 7 years under the current AWT method.

The Committee is seeking data and evidence to assist its consideration of a crediting period for the new AWT method (should it be remade). The Committee is seeking data and evidence for historical periods (the last 3 years) and projected periods (over the period to 2030) that could include:

- capital expenditure, ongoing costs and benefits, and payback period data for existing or proposed projects with a 7-year crediting period.
- capital expenditure, ongoing costs and benefits, and payback period data for activities that could be undertaken under the AWT method but are not economic with a 7-year crediting period.
- revenue by output type and underlying assumptions (such as electricity and ACCU price) now and over time for existing AWT projects.

- state, territory or local government measures that create incentives or disincentives for ACCU Scheme AWT projects including regulations or waste levies.
- information on regulatory and contractual requirements for ACCU Scheme AWT project activities.

The Committee welcomes other forms of data and information on, if the AWT method is remade:

- whether a longer crediting period for AWT projects may be warranted
- the deferral period and whether it should be longer than the AWT method allows for
- the functionality of the extended accounting period.

It should be noted that the Committee previously advised against extending the crediting period of the AWT method. Therefore, based on subsection 114(7A) of the Act, the crediting period of the current AWT method cannot be extended. Transitional provisions would need to be made if a new AWT method is made to enable a longer crediting period for current AWT projects.

The Committee welcomes views on:

Would activities undertaken under the AWT method continue after the end of the seven-year crediting period if they were not eligible to receive ACCUs? (Please provide supporting evidence based on the data request above) (Question 9)

If the crediting period was extended beyond the standard 7-year crediting period, would it result in new projects and expansion of existing projects that would not occur in the ordinary course of business? (Please provide supporting evidence) (Question 10)

Should there be any changes to the current 18-month deferral period, or the extended accounting period (Please provide supporting evidence) (Question 11)

3.4 Composting activity

One of the eligible activities under the AWT method is enclosed composting. Previous reviews of the method identified that compost from AWT projects was being sent to landfills or stockpiled due to limited market demand and regulatory changes, primarily in New South Wales, which constrained the use of AWT compost products on agricultural land. If a new AWT project was registered and sent the compost to landfill, the resulting emissions would not be factored into new abatement calculations under the current method, meaning there is a risk that the abatement would not be conservative nor meet the project emissions Offsets Integrity Standard.

Since 2016, only one composting project has been registered under the AWT method. This low uptake is due to:

- the high capital cost of the infrastructure used in the activity,
- shifts in state and territory waste management regulations preferencing source separation and greater use of anaerobic digestion to control odour from waste disposal, and
- lack of market demand for the product.

Given the integrity concerns and the low uptake of composting activity under the AWT method in recent years, the Committee is considering removing this activity in the new AWT method, should the method be remade. This proposed change would not impact the current composting projects registered under the method, although almost all these projects (except one) have already completed their crediting period.

It should be noted that the AWT method provides for composting of only mixed solid waste. Composting of source separated food or garden waste (green bins) could still be pursued under the Source Separated Organic Waste (SSOW) method[9].

The Committee also notes there has been a broad shift to source separation waste treatment as opposed to mixed-waste processing, which is carried out under the AWT method. Source separation has advantages relative to mixed waste treatment as it requires less intensive, less costly processing, and the ability to produce higher quality products due to 'purer' waste streams. While only one composting project have been registered under the AWT method since 2016, 21 composting projects have been registered under the SSOW method since the method was made in 2016.

The Committee welcomes views on:

Any concerns with removing the composting activity from the AWT method (Question 12)

3.5 Biomethane activity

A biomethane variation to AWT method was drafted in early 2022, and a public consultation on the draft variation was conducted in March/April 2022. However, advice on whether to make the variation was not progressed.

The Committee notes the uptake of biomethane projects in Australia is low, primarily due to high upfront capital infrastructure and operating costs. There has been only one biomethane project registered since this activity was added to 3 other ACCU Scheme methods in January 2022: the Landfill Gas (Generation) method[10], Animal Effluent Management method[11], and Wastewater method[12].

Biomethane projects involve the capture of biogas from decomposing waste, and refinement of that biogas into biomethane, a low-emissions natural gas substitute. ACCUs would be issued for the abatement generated when the biomethane is burned (conversion abatement), and from biomethane displacing fossil fuel natural gas consumption (displacement abatement).

[9] Carbon Credits (Carbon Farming Initiative—Source Separated Organic Waste) Methodology Determination 2016

[10] Carbon Credits (Carbon Farming Initiative—Electricity Generation from Landfill Gas) Methodology Determination 2021

[11] Carbon Credits (Carbon Farming Initiative—Animal Effluent Management) Methodology Determination 2019

[12] Carbon Credits (Carbon Farming Initiative—Domestic, Commercial and Industrial Wastewater) Methodology Determination 2015

The Committee's position is to only include biomethane activity in the new AWT method (should the method be remade) if there would be interest in this activity.

The Committee welcomes views on:

What would the uptake of the biomethane activity likely be in the coming years if it is added to the new AWT method? (Question 13)

3.6 Accounting for emissions from end-management of digestate

The AWT method does not include emissions from the end-management of digestate in the net abatement amount. The question of whether the emissions from end-management of digestate in AWT projects are material or not has been raised in the past. If the emissions are material, they must be accounted for in the method as a source of project emissions. This issue only relates to the anaerobic digestion activity.

None of the 5 anaerobic digestion projects registered under the AWT method have reported to the Clean Energy Regulator yet, meaning no ACCUs have been issued. This lack of data complicates the analysis, and the materiality of emissions from the end-management of digestate remains unclear. However, data from ACCU Scheme projects under the Wastewater method[10] suggests emissions from the end-management of digestate could be material.

The Committee is seeking data and information from AWT anaerobic digester operators to assist its evaluation of emissions related to end-management of digestate. The requested information includes:

- the type of anaerobic digester system in use and the frequency of digestate removal (cleaning)
- the method of digestate treatment, such as disposal to landfill or composting.
- the weight ratio of digestate to the feedstock.

The Committee welcomes views on: whether emissions from digestate are likely to be material and should be considered as a source of project emissions (Please provide supporting evidence based on the data request above) (Question 14)

3.7 Usability and other improvements

The Committee welcomes comments and suggestions on the design and operation of the AWT method that would help improve its usability and hence encourage uptake, such as:

- proponents' experience in implementing projects under the method, including any opportunities to remove barriers and increase uptake
- barriers to using the method, such as, the scope of activities covered by the method, meeting the project eligibility requirements, estimating the potential abatement using the calculation

stipulated in the method, or applying the reporting, measurement and verification rules and requirements

- if remade, whether the method should be modified or streamlined to improve its usability while continuing to meet the Offsets Integrity Standards
- issues related to adverse or beneficial environmental, economic or social outcomes from projects under the method
- should other activities, such as waste to energy technologies, be included.

The Committee welcomes views on: Any other suggestions to improve the AWT method (Question 15)

3.8 Remaking the method

The AWT method is due to expire on 31 March 2025 and sunset on 1 April 2025. While the expiry of the method has no impact on existing AWT projects that have commenced their crediting periods, no new projects can be registered after it expires. Stakeholders interested in carrying out new projects under the expiring method may be concerned about losing the opportunity to do so.

The Committee is seeking feedback from stakeholders on whether the method should be remade or allowed to expire. If a new method is established, it will be in effect for 10 years unless revoked earlier. New projects would be able to register under the new method, and existing projects may decide to transition to the new method. The Committee notes that changes might be needed in the new method to improve its integrity, taking into account industry developments, advancements in technology and changes in state and territory regulations and policy settings.

The Committee welcomes views on:

What do you think the uptake of the AWT method would be in terms of number of projects and ACCUs in the next 10 years if the method is remade (Question 16)

Glossary

Term	Definition
AWT	Alternative Waste Treatment
Committee	The Emissions Reduction Assurance Committee
ACCU	The Australian Carbon Credit Unit
The Act	The Carbon Credits (Carbon Farming Initiative) Act 2011
SSOW	Source Separated Organic Waste