Submission Template: Emissions Reduction Fund draft method determination

| Carbon Credits (Sequestration of Carbon in Soil Using Modelled Abatement Estimates) Methodology Determination 2014, and |
| Carbon Credits (Carbon Farming Initiative - Reducing greenhouse gas emissions from fertiliser in irrigated cotton) Methodology Determination 2014 |

Overview
This submission template should be used to provide comments on a draft Emissions Reduction Fund method determination.

Contact Details

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| Date: | 18 December 2014 |

Confidentiality
All submissions will be treated as public documents, unless the author of the submission has requested that the submission not be published on the grounds that its publication could reasonably be expected to substantially prejudice the commercial interests of the author or another person. Public submissions will be published in full on the Department of the Environment’s 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? ☑Yes ☐No

Submission Instructions
Submissions should be made by close of business on the day the public consultation period closes for the draft method determination. This date will be specified on the Department’s website: www.environment.gov.au. 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 – EmissionsReductionSubmissions@environment.gov.au

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

ERF Governance, ERF Division
Department of the Environment
GPO Box 787
CANBERRA ACT 2601
Name of draft method determination:

*Carbon Credits (Sequestration of Carbon in Soil Using Modelled Abatement Estimates) Methodology Determination 2014, and*

*Carbon Credits (Carbon Farming Initiative - Reducing greenhouse gas emissions from fertiliser in irrigated cotton) Methodology Determination 2014.*

(The comments below have applicability to both methodologies).

General comments

AORA is the national peak industry body representing the organics recycling industry and we recognise the importance of the carbon cycle and the significant contribution our industry makes through organic waste resource recovery and beneficial re-use of composted and/or further processed organics.

Nationally our industry directly:

- represents over 120 organics reprocessing businesses
- employs over 2000 people
- owns and operates in excess of $750,000,000 in infrastructure
- recycles in excess of 5,800,000 tonnes of organic material/annum
- delivers the recovery and beneficial re-use of valuable nutrients and carbon.

In our previous submissions on the Emissions Reduction Fund we highlighted that:

- recycling of organic waste materials such as garden organics, food, biosolids, paper sludge and woody residues prevents the generation of methane emissions in landfill (methane is greenhouse gas 21 times as powerful as carbon dioxide)
- the application of compost increases soil carbon which acts as a long term carbon sink
- compost/organics re-use increases soil productivity and avoids nitrous oxide emissions (nitrous oxide is a gas 310 times as powerful as carbon dioxide)
- compost/organics re-use also lowers energy use because of reduced dependence on irrigation and conventional fertilisers.

AORA welcomes the growing number of methodologies that have application to recycled organics and is encouraged by the positive interactions that AORA and AORA members are having with the Department of Environment.

The potential for inclusion of recycled organics under both the soil carbon modelling and reduced fertiliser emissions in irrigated cotton is welcome. AORA understands that the modelling approach is inherently conservative in nature, however would highlight that the amount of emissions reductions from instances where recycled organics are used are likely to be understated.

Compost improves the capacity of soils to grow plants and so increase carbon produced in situ. There is a growing body of work that shows a deepening of soils with the addition of compost. (In other words reduced soil strength /improved tilth down the soil profile). The result is deeper root growth and more biomass within soils. There’s also evidence that humic and fulvic compounds bind with and hold other carbon compounds.
For this reason, AORA strongly recommends that a soil carbon measurement methodology for cropping be developed. This would build on the good work undertaken for the grazing systems methodology and would be achievable with modest additional work by the Department. It would also allow many compost users to achieve a greater level of sequestration than is suggested by the default model values.

Following on from a cropping methodology, it is recommended that approaches for row crops such as vineyards and orchards be prepared. These would provide instruction on dealing with the concentration of soil carbon along rows, compared to in-between rows, but would capture the overall net benefit of increased soil carbon. Furthermore, this approach could also be applied to other areas such as the increase of soil carbon through compost application in urban environs.

AORA is hopeful that greater uptake of measured soil carbon projects will allow the development of improved model values for emissions reduction projects using composted products. A ‘no regrets’ true-up should be made available to projects that are using the model methodology. Other approaches, such as using a control paddock to demonstrate that actual sequestration is greater than what is modelled, and the ability to then use a project specific default value to enter into the sequestration model have merit. Other proxies could also be developed, such as additional harvest yield over past years demonstrating greater above ground and therefore below ground biomass growth. In the meantime it is suggested that the current CSIRO project with the Department of Agriculture testing compost application and soil carbon levels should provide a platform to begin this process.

One concern identified by AORA is the concept of requiring written advice on a nutrient management programme from a ‘qualified person’ and the meaning of ‘qualified person’ in the method, in that this advice on ‘best practice nutrient management’ could prejudice solutions that involve recycled organics. As a start in rectifying this concern, AORA would welcome the opportunity for some form of ‘formal’ pre-qualification of individuals from within the greater AORA network who meet the Methodology definition of qualified person so that their participation can be promoted to potential project proponents.

Another issue relates to ‘liming’ as the only prescribed activity for soil acidity management. The application of compost is known to buffer soil pH levels and mitigate acidity. The Methodology should have the flexibility to include other activities that deliver the same result.

Specific comments – please insert your specific comments below, listed against the part of the draft method determination to which they apply.

Note: In some cases the draft Explanatory Statement may flag specific issues for consideration by stakeholders.

Do you consider projects that would apply the draft method are likely to cause significant adverse environmental, economic and/or social impacts?
If so, what existing frameworks (such as regulatory frameworks or policies) are in place to address any such impacts?

N/A