

Public Consultation

Alternative Waste Treatment (AWT) Methodology

October 2026

Australian Resources Recovery Council

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1.0 ARRC Public Consultation – October 2026

1.1 Consultation

In late 2025, Assistant Minister Josh Wilson MP approved the Australia Resources Recovery Council (ARRC) to lead the remake of the expired Alternative Waste Treatment (AWT) method under the Australian Carbon Credit Unit (ACCU) Scheme. The ACCU Scheme plays a critical role in reducing emissions and keeping Australia on track to meeting its 2050 net zero target.

In remaking the method, we will be addressing the matters identified in Minister Wilson's approval and be guided by the recommendations of the Emissions Reduction Assurance Committee's (ERAC's) AWT periodic review report 2025 and the Independent Review of ACCUs.

Throughout 2026, ARRC and key stakeholders have been developing the new AWT method. We are now seeking your views on the scope and design of the proposed new AWT method, including:

- Definitions, scope and design
- whether to include biomethane generation, enclosed composting and activities from the expired Source Separated Organic Waste (SSOW) method 2016 as eligible activities
- updating of landfill gas (LFG) emissions and capture rates
- crediting period length
- whether emissions from the end management of digestate should be accounted for in project emissions calculations
- improving abatement calculations for anaerobic digestion
- deferral period length
- other matters relevant to remaking the AWT method.

There have been several previous AWT methods, the most recent of these expiring 31 March 2025. The approach being taken for this e AWT method development process is to review and refine the previous version rather than start again. Where elements are working well, we propose no change, where changes may improve functionality, effectiveness, and opportunity, then they are presented in this discussion paper for consideration.

Views on our proposed approach are welcomed.

To have your say:

- read this consultation paper available on the Australian Resources Recovery Council (ARRC) website – Alternative Waste Treatment Methodology (ACCU Scheme); and
- provide feedback by completing the survey.
- any questions or to provide your feedback via email should be directed to: secretariat@ausrrc.com.au

Please submit your feedback by **11.59pm AEST 29 November 2026**.

1.2 Confidentiality

Your submission will be treated as a public document and shared with the AWT Stakeholder group for the purposes of refining the draft AWT method *unless you indicate your submission is confidential*.

If you indicate your submission is confidential it will not be published and the information will only be shared with the ARRC Method Development team for the purposes of developing draft documentation for review by the following federal government bodies:

- Emissions Reduction Assurance Committee (ERAC), the independent statutory committee responsible for assessing existing and proposed methods against the legislated offsets integrity standards
- Department of Climate Change, Energy, the Environment and Water (the Department), responsible for managing ACCU Scheme policy
- Clean Energy Regulator (CER), responsible for administering the ACCU Scheme.

If you indicate in your AWT Method Public Consultation Paper Survey and/or submission that you can provide further data or information to support a proposed policy position, please give a brief overview in the designated response box. ARRC will follow up with you to discuss your data or information in detail.

If the information is confidential, if you simply refer to this for each topic in the Discussion Paper and Drafting Instructions, we can arrange for you to send the information directly to DCCEEW/ERAC at a designated time.

*Note: This is the first public consultation for the AWT method development, and it is being undertaken by ARRC. The ERAC will subsequently undertake its own public consultation process on the draft determination, as required by legislation.

1.3 Privacy

ARRC will deal with personal information contained in, or provided in relation to, submissions in accordance with its Privacy Policy.

Contact information is collected (Questions 1-3 of the online survey) so we can contact you regarding your submission. Contact information and other personal information contained in submissions may be used and disclosed to the departments/committees documented above for the purposes of the AWT method periodic review, other related purposes.

Please de-identify or remove any personal information of third parties unless you have obtained their consent to their information being included and it being shared with government bodies mentioned above prior to making the submission to this consultation process.

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2.0 Introduction

The ACCU Scheme supports projects that avoid the release of greenhouse gas emissions or remove and sequester carbon from the atmosphere.

Methodology determinations or 'methods' are legislative instruments made by the Minister for Climate Change and Energy (the Minister) in accordance with the *Carbon Credits (Carbon Farming Initiative) Act 2011* (the CFI Act) and the *Carbon Credits (Carbon Farming Initiative) Rule 2015* (CFI Rule). Methods set out the rules for undertaking projects and calculating the emissions reductions that create ACCUs. Currently, responsibility for the ACCU Scheme is delegated to the Assistant Minister for Climate Change and Energy.

Methods must ensure the emission reductions eligible to earn ACCUs are additional, that is, they are real and go beyond business-as-usual operations. All methods must meet the legislated Offsets Integrity Standards (OIS)[1] as assessed by the independent ERAC.

In 2024, the Government implemented a proponent-led process for developing ACCU Scheme methods as recommended by the 2022 Independent Review of Australian Carbon Credit Units (the ACCU Review). Under the government's current approach to proponent-led method development process, the Minister for Climate Change and Energy prioritises method proposals for development informed by advice from the ERAC. In late 2025, the Honorable Josh Wilson MP, Assistant Minister for Climate Change and Energy approved the Australian Resources Recovery Council (ARRC) as the proponent to lead development of a new **Alternative Waste Treatment (AWT) method** based on advice from the ERAC.

3.0 Overview of the AWT method

The expired AWT method was originally made on 12 January 2015 and combined 4 previous methods of the Carbon Farming Initiative (CFI) covering activities such as composting. Its development was informed by inputs of a technical working group of waste industry experts, and the Clean Energy Regulator (CER).

The expired 2015 AWT method credited avoided methane emissions from decomposing organic waste in landfills by diverting mixed solid waste otherwise destined for landfill to AWT facilities. The method covered 3 activities:

- processing waste through enclosed composting
- using one or more anaerobic digesters and transferring the biogas to a combustion device for destruction
- manufacturing process engineered fuel.

The eligible waste streams under the expired 2015 method were:

- municipal solid waste (red bin waste),
- construction and demolition waste,
- commercial and industrial waste,

[1] Offsets integrity standards (OIS), Section 133(a) *Carbon Credits (Carbon Farming Initiative) Act 2011*

Ineligible wastes included specified recyclable wastes separated at the point of generation such as glass, organic wastes from the livestock industry and biosolids. There were 3 types of projects under the method:

- **new projects** – constructing a new AWT facility to process eligible waste that would have gone to landfill and used eligible waste treatment technology
- **expansion projects** – increasing the capacity of eligible waste an existing AWT facility could process
- **transitioning projects** – eligible offsets project covered by one of the 4 CFI AWT methods operating before the 2015 method was made.

Abatement was calculated as baseline emissions minus the project emissions. Baseline emissions were calculated as the methane and other greenhouse gas emissions from the organic component of eligible waste that would have otherwise gone to landfill less methane oxidation at the surface of the landfill and the state-based average landfill gas capture rate.

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

As at 28 February 2025, 33 projects were registered under the method: eight were revoked; 13 had finished their crediting periods; and 12 were active.

Over its life, the expired 2015 method was reviewed several times including the final review in 2024/25. In 2022, it was proposed to vary the method to include biomethane and make other changes including removing enclosed composting but this was not progressed.

3.1 Alternative Waste Treatment Methodology (AWT method)

The new AWT method would provide an important incentive for businesses and local governments seeking to implement more sustainable waste management practices and generate carbon credits under the ACCU Scheme. It would encourage innovation in waste management and resource recovery, providing a structured approach for crediting emissions reductions from projects where mixed solid waste that would otherwise have gone to landfill is processed into products such as compost, biogas, or process-engineered fuel.

By preventing organic waste from decomposing in landfills, AWT projects reduce methane emissions, support sustainable waste management, and contribute to Australia's emissions reduction targets.

3.2 Aim – a simple and accessible method that is futureproof

ARRC has embraced the opportunity to develop an innovative method incorporating the advice outlined in the 2022 ACCU Review led by Professor Ian Chubb, which called for the development of simpler and more accessible methods. The ACCU Review also recognised the need for future proofing methods given technologies can develop or progress faster than legislation can be reviewed or changed.

The approach being taken in this process to develop a new AWT method is to build on and refine the 2015 method, which expired on 31 March 2025, rather than start from a blank slate. Therefore, this discussion paper focuses on changes compared to the 2015 method that could improve functionality, effectiveness, and opportunities. These proposed changes aim to incorporate new

data, improve landfill gas capture estimates, and introduce flexibility so new or emerging technologies can be incentivised without the need to vary the new method.

3.3 Maintaining integrity of the AWT method development process

ARRC is committed to leading the AWT method development process with integrity, upholding moral and ethical principles through honesty, accountability, and trustworthiness.

Key to maintaining the integrity of the process is:

- Oversight by the ERAC and the Department
- Alignment of development activities with the:
  - *AWT periodic review report 2025* (ERAC)
  - Specific issues raised for consideration (see Assistant Minister Wilson's letter of engagement in 5.0 Appendix)
  - *Process guide for developing a proponent-led ACCU Scheme method* (DCCEEW)
  - Offsets Integrity Standards (OIS) as contained in section 133 of the CFI Act
- Stakeholder engagement (industry, associations, government) activities by ARRC. 35 organisations have signed up to the AWT Stakeholder Group. Stakeholders have been actively engaged in stakeholder workshops and fortnightly meetings for the duration of the method development process, providing valuable insights and perspectives.
- Public consultation processes by both ARRC (this consultation) and ERAC (as required by the CFI Act).

*ARRC acknowledge the Carbon Credits and Other Legislation Amendment (Integrity and Transparency) Bill 2026, which was introduced into the House of Representatives on 20 August 2026 may affect some aspects of the process. ARRC will work with the Department to ensure the future AWT method meets the passed Bill's requirements.

4.0 Feedback sought from stakeholders

4.1 Context

Before a method can be made, the ERAC must be satisfied the proposal meets the 6 offsets integrity standards set out in s.133(1) of the CFI Act:

- **Additionality:** a method should result in carbon abatement that is unlikely to occur in the ordinary course of events.
- **Measurable and verifiable:** a method involving the removal, reduction, or emissions of greenhouse gases should be measurable and capable of being verified.
- **Eligible carbon abatement:** a method should provide abatement that is able to be used to meet Australia's international mitigation obligations.
- **Evidence-based:** a method should be supported by clear and convincing evidence.
- **Project emissions:** material greenhouse gas emissions emitted as a direct result of the project should be deducted.
- **Conservative:** estimates, projections, or assumptions used in a method should be conservative.

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In providing feedback to our consultation, we ask that your submissions are guided by the OIS as well as considerations of scale of abatement, practicality of undertaking a project, and the administrability of the future method by the CER.

As indicated above, we have identified the following areas for reform based on the ERAC's recommendations outlined in the AWT periodic review report 2025 and matters listed in our letter of engagement from Assistant Minister Wilson:

- Including enclosed composting activities and activities from the expired Source Separated Organic Waste method 2016
- Landfill gas capture rate and emissions factors
- Crediting period longer than 7 years
- Including biomethane generation as an eligible activity
- Accounting for emissions associated with digestate

We have used the expired AWT method as our foundation. The proposed changes below should be considered as changes to the 2015 version except for the extended accounting period, which ARRC is proposing not to include the future method.

4.2 Extended accounting period

The extended accounting period is an approach to emissions abatement calculation and reporting under the CFI Act. It begins in year one of emissions reductions and allows projects to report and earn ACCUs for abatement calculated and accrued during the crediting period, after the end of the crediting period. Activities conducted during this extended accounting period are not eligible to earn ACCUs.

The AWT periodic review report 2025 recommended that the proponent consider changes to the extended accounting period to encourage greater uptake and abatement. Stakeholder consultation supports this recommendation, confirming that its removal would improve project financial viability and reduce administrative burden for both the CER and project proponents.

Survey Questions (please respond online)

4. ARRC are proposing not to include an extended accounting period in the future method and align the crediting approach with the Landfill Gas method 2025. This would see ACCUs issued for eligible emissions reduction from the avoided landfill emissions in a reporting period, rather than in 7 portions over 7 years with a 'balancing up' over a further 6 years as was the case under the expired AWT method. Do you agree that the extended accounting period should be removed as recommended in the ERAC periodic review?
5. Do you foresee any impacts associated with removal of the extended accounting period? If yes, please provide details.
6. Do you have any information you can share that would assist in justifying the integrity of this change?

4.3 Eligible waste treatment

ARRC proposes developing a high integrity method with a robust yet flexible framework that is agnostic enough to allow projects using new technologies to be registered without the need for method variations.

Projects would be required to demonstrate at time of application whether the technology being used in the project meets the method's requirements. The method would have sufficiently robust

definitions and information requirements to enable the CER to make a decision on eligibility, rather than the method determining eligible technologies, as the expired method did.

To this end, we are proposing to revise the definition of **'Eligible waste treatment'**. The intent is to maintain the core emissions reduction activity under the AWT method of crediting avoided methane emissions of organic waste that otherwise would have gone to landfill. We propose to maintain:

- processing waste through enclosed composting with appropriate evidence to justify this position and considering the ERAC's periodic review and Assistant Minister Wilson's engagement letter (refer 4.3 for further information)
- using one or more anaerobic digesters to generate biogas, which is subsequently transferred to a combustion device for destruction
- manufacturing **process engineered fuel**.

We propose to add a new activity: **'advanced thermal treatment',** which would involve a process such as gasification, pyrolysis or vitrification, that uses heat to transform waste materials into energy, fuel and/or materials, for example, low carbon fuels, methanol, ammonia, plastics, oils, biochar or other equivalent low carbon content products.

Adding this new activity would assist to future proof the method and potentially allow projects using different and new technologies that process eligible waste, which otherwise would have gone to landfill, to be eligible for registration under the method. Projects would not be able to claim emissions reductions from products of advanced thermal treatment.

We also note that large-scale thermal facilities producing 100,000 tCO_2-e of Scope 1 emissions per year would be covered by the Safeguard Mechanism and therefore would be ineligible to undertake an ACCU project.

It is proposed, that if considered necessary, supplements that set out a technology's specifications could be used to provide greater guidance for the CER when it assesses project eligibility. This approach would be similar to the Supplement to the Carbon Credits (Carbon Farming Initiative – Estimation of Soil Organic Carbon Sequestration using Measurement and Models) Methodology Determination 2021 Version 1.1, which contains additional technical and calculation information and guidance for both project proponents and the CER. Using this approach, the supplement would be updated or supplements added providing additional technical detail on a new or innovative technology not previously used in an AWT project, *where the CER advises this is required in order to assess a project for registration.* New supplements or amendments to a single supplement would be developed by a project proponent in consultation with the CER and DCCEEW.

Other legislation that could be used to inform the determining eligible projects include the *Future Made in Australia (Guarantee of Origin) Act 2026* and its supporting rules.

This approach is preferred to varying the method to incorporate specific technologies or calculations given the length of time and complexity that process involves.

Ultimately, regardless of the technology path chosen, the future AWT method proposes that ACCUs would only be issued for a project's net avoided abatement where eligible waste that would have otherwise gone to landfill is processed via an eligible activity.

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Survey Questions (please respond online)

7. Are you supportive of inclusion of a new category 'Advanced thermal treatment'?
8. Are you supportive of a broad definition of Advanced thermal treatment in the method, potentially using supplements or method variations to provide additional detail for a new or novel technology?
9. Do you have information, data or other evidence that would support inclusion of this new activity and how specific advanced thermal technologies would meet the OIS? If yes, please provide details, for examples, industry reports, technical specifications, methods from other schemes, and peer reviewed papers.
10. Do you have concerns? If yes, please provide your reasons.

4.4 Enclosed composting activities

The AWT periodic review report 2025 found that the method continued to meet the OIS except for the enclosed composting activity, which was assessed as not meeting the Project Emissions and Conservativeness standards. The ERAC found reasonable evidence that compost from enclosed composting activities was being sent to landfill or stockpiled, due to lower market demand and increased regulatory standards for compost in some jurisdictions. As the 2015 method did not account for emissions from its decomposition in landfill, it meant the method did not meet the Project Emissions OIS as these emissions were not accounted for, and the Conservativeness OIS was not met as projects could be credited for emissions reduction that did not occur.

While the ERAC recommended that in a remade method enclosed composting should not be included, it is proposed *to include* enclosed composting from mixed solid waste (including FOGO and municipal solid waste) in the new AWT method. It is proposed that to meet the Project Emissions and Conservativeness OIS, emissions factors and calculations for disposing of compost to landfill or using compost for landfill operational purposes be included. This approach could also be used for biochar if disposed of in landfill.

Disposal of compost to landfill or its use in landfill operations such as daily cover or final landfill cap growing medium, still results in emissions savings as it operates as a methane oxidiser. Compost produces less methane compared to mixed solid waste under anaerobic conditions and therefore should be credited.

It is proposed not to include open windrow composting in a future AWT method as it can be considered an activity that occurs in the ordinary course of events and therefore not additional.

Survey Questions (please respond online)

11. Should enclosed composting be included in the new method where appropriate demonstration is provided that the project can meet Project Emissions and Conservativeness OIS?
    - If no, please provide your reasons.
    - If yes, please provide evidence of the emission savings compared to disposal of organic wastes or composted material to landfill.
12. Could a similar approach be taken for biochar applied to land from an AWT process? If yes, please provide:
    - evidence of the emissions savings compared to disposal of waste to landfill.
    - information about why the Soil Carbon method 2021 is not suitable.

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4.5 Including Source Separated Organic Waste (SSOW) method 2016 activities

The sunsetting review of the SSOW method recommended considering incorporating its activities into a remade AWT method. However, the additionality of SSOW activities must be considered carefully given legislative requirements for separate collection of food and garden organics are being introduced in several states, as well as any existing regulatory requirements for composting or bio-digestion of these wastes.

ARRC proposes to revise definitions under the new AWT method to cover most types of activities previously covered under the expired SSOW method. The primary difference would be the changing of crediting from time of generation of the diverted waste, as was the case under the SSOW method, to the time of processing at the AWT infrastructure. This would also allow the AWT proponent to be the project proponent.

It is proposed that:

- Source separation activities and eligible organic material under the SSOW method could all potentially fit under the future AWT method activities and eligible waste stream definitions (refer 4.3 and 4.15). All activities would need to divert eligible waste from landfill, and result in eligible carbon abatement.
- Both methods included enclosed composting, anaerobic digesters and processed engineered fuel manufacture as eligible treatment technologies and we do not propose to vary this noting we propose enclosed composting to remain in and for biomethane generation from anaerobic digesters to be included.
- ARRC is currently proposing open windrow composting and food diversion to registered charities be excluded from a remade AWT method. This approach is taken given the limited take-up of these activities under the expired SSOW method and because it appears these activities are happening in the ordinary course of events without the ACCU incentive. For this position to change, ARRC would need evidence on how these activities meet the Additionality OIS.

Survey Questions (please respond online)

13. Will the proposed definitions allow activities previously covered by the SSOW method?
14. Are you supportive of crediting being changed from the time of generation of the diverted waste (SSOW) to the time of processing at the AWT infrastructure (AWT)?
15. Do you support excluding 'open windrow composting' and 'food diversion to registered charities' as treatment types under the new AWT method? If no, please provide evidence of how activities you consider should be included would meet the OIS, particularly Additionality.

4.6 Landfill gas capture rates and emissions factors

Capture rate

The ERAC indicated in the AWT method periodic review report that it considers a remade method should ensure projects use updated landfill rates calculated from the National Greenhouse Accounts (NGA Factors) at the time of reporting, rather than the one at time of registration.

ARRC is proposing the new AWT method locks in the landfill gas capture rate for a project at the time of registration based on the latest state based capture rate as calculated from the NGA Factors, then increases at 0.5% per annum. Using the state-based capture rate would be more reflective of

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the actual abatement being achieved compared to using a national capture rate, which does not reflect the waste composition and climatic conditions where the diversion is occurring. This is important for ensuring conservativeness and delivering greater accuracy in claiming ACCUs.

This annual increase is consistent with the increasing baseline under the Landfill gas method 2025 and is included to ensure conservativeness. Updating rates at time of reporting would introduce too high a risk of volatility and uncertainty, which would materially impact investment certainty. This would mean the new method would be unlikely to incentivise AWT projects.

Survey Questions (please respond online)

16. Do you agree with updating landfill gas capture rates in the new AWT method to align with the NGA Factors?
17. Should state-based or national figures be used? Why do you prefer this?
18. Which approach provides the greatest level of conservativeness while balancing investment certainty and investment attractiveness of AWT projects?
    - NGA Factors state-based capture rate, or the national landfill gas capture rate if a state-based capture rate is not available, at the time of reporting
    - NGA Factors state-based capture rate, or the national landfill gas capture rate if a state-based capture rate is not available, at time of registration then annual increase at 0.5%
    - NGA Factors national landfill gas capture rate, at time of reporting
    - NGA Factors national landfill gas capture rate, at time of registration then annual increase at 0.5%
    - If you have other ideas on how to provide necessary conservativeness and investment certainty, please provide details.

Project Emission factors and net abatement calculations

Project emissions factors are required to calculate the net abatement, and therefore the ACCUs generated.

Net abatement is calculated as:

Net abatement = Total abatement – project emissions

Project emissions are all the emissions that directly result from the activities being undertaken within a project's boundary. In other words, the additional abatement is calculated by deducting the emissions which only occur because of the project from the total amount of abatement created, being the landfill emissions that have been avoided.

Project emission calculations are contained in Part 4 of ACCU Scheme methods. Table 1 summarises the greenhouse gas sources a project proponent would need to account for when calculating net abatement. A project may or may not include one or more of the greenhouse gas sources. Project emissions are Scope 1 emissions and Scope 2 emissions from electricity use resulting from undertaking the project. Further, only material emissions are included in setting project boundaries.

In 2022, the *ERAC set a rule of thumb* that if an emissions source was likely to be less than 5% of total project emissions, then it can be considered immaterial and does not need to be included.

Further, the ERAC does not consider the Project Emissions OIS as requiring methods to include deductions for either direct or indirect leakage as they do not occur as a 'direct consequence of carrying out the project'. Direct leakage is a consequence of non-project activities. Similarly, indirect

leakage is a consequence of multiple factors, many of which lie outside of the control of the project proponent.

The ERAC does consider the potential for direct and indirect leakage as a consequence of project activities emission leakage under the Conservative OIS.

Item	Relevant calculation	Emissions source	Greenhouse gas
1.	Baseline emissions	Decomposing eligible mixed solid waste in a landfill	Methane
2.	Project emissions	Fuel consumption from plant equipment	Carbon dixoide Methane Nitrous oxide
3.	Project emissions	Electricity consumption	Carbon dixoide Methane Nitrous oxide
4.	Project emissions	Emissions from composting processes	Methane Nitrous oxide
5.	Project emissions	Emissions from anaerobic digester leakage or venting events (includes fugitive emissions)	Methane Nitrous oxide
6.	Project emissions	Emissions from combusting biogas as part of an AWT project	Methane Nitrous oxide
7.	Project emissions	Process emissions from process engineered fuel not otherwise specified	Carbon dixoide Methane Nitrous oxide
8.	Project emissions	Process emissions from advanced thermal treatment processes not otherwise specified	Carbon dixoide Methane Nitrous oxide
9.	Project emissions	Emissions from disposing of compost produced by an AWT project to landfill	Carbon dixoide Methane Nitrous oxide
10.	Project emissions	Emissions from disposing of biochar produced by an AWT project to landfill	Carbon dixoide Methane Nitrous oxide
11.	Project emissions	Emissions from disposing of a product produced by an AWT project to landfill other than compost or biochar	Carbon dixoide Methane Nitrous oxide

It is proposed the new AWT method would require project proponents to use the NGA emissions factors in place at the time of reporting for the covered waste types and methane. This ensures the method would meet the Clear and Convincing Evidence, Eligible Carbon Abatement, and Conservativeness OIS. An IPCC emissions factor will be used if an Australian emissions factor is not available, such as an emissions factor for biochar's emissions under anaerobic conditions.

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Survey Questions (please respond online)

19. Do you support the use of NGA factors for calculating project emissions? If no, please provide your reasons.
20. Do you agree that aligning factors and parameters in the new AWT method to be consistent with the NGA Factors and National Greenhouse Energy Reporting System (NGERS) Measurement Determination 2008, would improve confidence that the method would continue to meet the OIS over time?
21. What changes should be made to how abatement was calculated under the expired AWT method to support including biomethane production and advanced thermal treatment activities so the new method meets the OIS?
22. Do you have any data that you could share that demonstrates consideration of increases in emissions or reductions in removals that occur outside the project boundary due to a project activity? **Data may assist in demonstrating that these emissions are immaterial?*
23. Is there a risk that by undertaking these activities under the AWT method that there would be an increase in emissions in other areas of the economy?

4.7 Crediting period

An ACCU method must set a crediting period[2] for the activities it incentivises. Crediting periods are the length of time over which the activities can be considered as likely to be outside the ordinary course of events, that is, additional. The *CFI Act* sets 7 years as the default crediting period for emissions avoidance methods and it was this default crediting period that was used for the *2015 AWT method*. However, industry experience indicates that the majority of AWT activities would create additional abatement for a much longer time if the ACCU incentive was available for longer than 7 years.

We are proposing that a longer crediting period of 25 years would unlock new AWT investments. Reasons for this position include:

- high, and increasing, capital and operating costs (land, equipment, labour, utilities and insurance), combined with the long asset lives of AWT projects (>20 years). AWT facilities cost between $50 million and $1 billion:
    - A longer crediting period is necessary to support and maximise investment in AWT projects and is consistent with the Carbon Capture and Storage method 2021, which involves similar scale infrastructure approvals.
- currently, projects under the Landfill Gas method 2025 can access a 12 year crediting period but have significantly lower capital and costs compared to AWT facilities.
- a longer crediting period would provide greater certainty for investors and financiers, increasing the likelihood AWT projects would be undertaken.
- provides greater incentives and support for national recycling and landfill diversion targets by providing a longer crediting period than the landfill gas methods.

The ERAC's AWT method periodic review 2025 stated that extending the crediting period beyond the previous 7-year period could be considered provided fulsome evidence was gathered through the remaking process to support the proposal. In other words, the ERAC will require clear and convincing evidence, one of the OIS, to support the proposal for a longer crediting period. Specifically, data on project costs including infrastructure, development approvals, operation, and

[2] *Crediting period, Section 69(3) Carbon Credits (Carbon Farming Initiative) Act 2011*

maintenance will be required. Comparative information with other ACCU Scheme project establishment and operation would also be very informative.

Survey Questions (please respond online)

24. Do you support ARRC's proposal to increase the crediting period to 25 years? Why or why not?
25. What crediting period do you require for your project to be viable? Please provide justification.
26. Please indicate whether you can provide clear and convincing evidence to support your preferred crediting period, and if so whether you are willing to provide it to share with DCCEEW/ERAC to inform their decisions. *(Information will be kept confidential and only be used for the purposes of supporting a longer crediting period under the AWT method. If required, we can organise for information to be sent at an appropriate time directly to the Department)*

4.8 Including biomethane projects

Biomethane is produced from upgrading or 'scrubbing' biogas to around 95% methane, providing a direct equivalent to natural gas. When combusted, carbon dioxide emissions have an emissions factor of 0 because biomethane is produced from organic or biogenic sources[3].

ARRC proposes to include biogas generation and biomethane production within the same project as eligible activities under the AWT method. This aligns with stakeholder feedback to the ERAC's AWT method periodic review 2025, which supported including biogas capture and biomethane production in an updated method.

It is proposed to use calculations similar to those used in the Animal Effluent Management (AEM) method 2019, including calculation of the methane generating potential by measuring the produced biogas. For example, from the AEM method provides:

32D Project biomethane facility net abatement amount

The project biomethane facility net abatement amount for a reporting period for project biomethane facility h, $A_{displacement,\,h}$ (in tonnes CO_2-e), is worked out using the formula:

$$\mathrm{A_{displacement,\,h}} = \mathrm{GA_{displacement,\,h}} \times \mathrm{EA_h} - \mathrm{PE_{displacement,\,h}}$$

where:

$GA_{displacement,\,h}$ is the gross abatement amount for the reporting period for project biomethane facility *h*, in tonnes CO_2-e.

EA_h is the eligible abatement fraction for the reporting period for project biomethane facility *h,* as a fraction.

[3] https://americanbiogascouncil.org/wp-content/uploads/ABC-Biogas-Carbon-Accounting-Tool-Version-1.1-3-JAN-2025.pdf
https://www.dcceew.gov.au/sites/default/files/documents/national-greenhouse-account-factors-2025.pdf

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$PE_{displacement, h}$ is the project emissions for the reporting period for project biomethane facility *h,* in tonnes CO_2-e.

All existing ACCU Scheme methods that include biomethane credit avoided emissions *and* fossil fuel displacement – referenced as 'conversion abatement' and 'displacement abatement' respectively. With biomethane policies evolving (e.g. Guarantee of Origin, renewable gas certification, market-based accounting) and the AWT method being designed to recognise the avoidance of landfill emissions through its activities, ARRC wishes to consider whether or not fossil fuel displacement provisions are required.

Survey Questions (please respond online)

27. Do you support including biogas capture and biomethane generation as eligible activities under the new AWT method? (Subject to projects demonstrating they meet Additionality OIS)
28. What are your views on the need for any fossil fuel displacement provisions?
29. Do you agree that there should be a simpler measurement of methane generation potential by measuring the produced biogas, similar to the AEM method?

4.9 Accounting for digestate emissions

Anaerobic digestion covers several technologies, resulting in liquid or solid digestates along with the biogas. Emissions associated with treating digestates, such as dewatering where relevant, would be included as project emissions. For completeness and to ensure the new AWT method meets the OIS, we considered the materiality of emissions associated with the end uses of digestate, particularly its beneficial application to soil.

ARRC proposes that emissions associated with end use of digestate not be accounted for in project emissions *unless* the digestate is disposed of in landfill.

Reasons for this approach include:

- ARRC has been advised that emissions from applying digestate to land are unlikely to be material (less than 5% of total emissions relative to production emissions).
- DCCEEW's National Inventory Systems and International Reporting Branch advised Minister Wilson's office that digestate is not explicitly referenced in the National Greenhouse Gas Inventory nor the Intergovernmental Panel on Climate Change (IPCC) waste volume guidance and is not considered a significant source of emissions.
- Like compost, disposing of digestate to landfill is likely to be by the project proponent, and therefore an activity directly related to and controlled by the project proponent. This would be a project emission and require an emission factor.
- Any emissions arising from applying digestate to land will be influenced by matters such as the end user's practices, land and climate. A proponent producing digestate cannot control those emissions (in the same way that fertiliser or compost manufacturers cannot). There is no similar requirement for compost emissions nor process engineered fuel.
- Digestate is generally considered to result in beneficial emission outcomes, particularly when compared to synthetic fertilisers and soil enhancers[4]. This is reflected by calculations for digestate in the Soil Carbon Method 2021.

[4] https://www.sciencedirect.com/science/article/abs/pii/S0301479725012204; https://www.sciencedirect.com/science/article/pii/S0301479726013125;

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Survey Questions (please respond online)

30. Do you agree with the proposed approach to digestate emissions? If no, please provide your reasons.
31. Are there reasons why emissions from applying digestate to land should be included in the new AWT method to ensure it meets the OIS? If yes, please provide references, data or other evidence.
32. Do you have any references, data or other evidence to support the assertion that these emissions are immaterial? If yes, please provide details.

4.10 Transitional arrangements

It is proposed that the new AWT method enable existing projects to transition to the new method once made, to enable access to a longer crediting period and continuance as a project under the ACCU Scheme, where projects continue to comply with the new method.

Projects may be at different stages of project progression, requiring varied transition arrangements:

- **AWT projects in their crediting period but not yet operational** due to the former 18-month deferral being too short or because projects were required to move into crediting when the method sunsetted (31/03/25), would:
    - Be allowed to either transition to the new method and receive the full new deferral period; or revoke their project from the expired method and re-register under the new method without failing the newness test.
    - Be eligible for the full new crediting period once their deferral period has ended.
- **AWT projects in their crediting period and generating ACCUs** would:
    - Not require a deferral period.
    - Be issued with all "tail" ACCUs earned during the extended accounting period when projects transition to the new method.
    - Have their new crediting period reduced by the time between the method being remade and the transition date, consistent with the new landfill method.
- **AWT projects in their extended accounting period, receiving tail ACCUs but not generating new ACCUs** would:
    - Not require a deferral period.
    - Be issued with all "tail" ACCUs earned during the extended accounting period when projects transition to the new method.
    - Have their new crediting period reduced by the time between the method being remade and the transition date, consistent with the new landfill method.
    - Begin the new crediting period immediately after the previous crediting period ended.
- **AWT projects post their extended accounting period (first projects to reach this stage December 2027)** would:
    - Not require a deferral period.
    - Not require the issuing of "tail" ACCUs from the extended accounting period at project transition to the new method.
    - Have their new crediting period reduced by the time between the method being remade and the transition date, consistent with the new landfill method.

- Begin the new crediting period immediately after the previous crediting period ended.

- **AWT projects expansion projects that are not in their deferral period, but should be,** would:
  - Have the ability to transition to the new method.
  - Be issued with all "tail" ACCUs earned during the extended accounting period when projects transition to the new method.
  - Allow for an expansion project and core project at the same site to be combined, consistent with the landfill method which only allows one registered project per site.
  - Transition to the new method with the crediting period reduced by the period of time between the method remaking and transition date, in a similar approach to the new landfill method.

ARRC are requesting that DCCEEW and the CER establish a transitional mechanism (e.g. recognised notice of intention) so proponents can preserve newness during remaking and subsequent registration of ACCU projects once the method is remade. While the future AWT method could include in lieu of newness provisions, we consider a more streamlined approach would be the notice of intention.

Initial advice from the Department is that there is no intent to reintroduce such a transition mechanism, which had been used during the transition between the Carbon Farming Initiative and the Emissions Reduction Fund.

This is an important matter for ARRC and its members is that without such a mechanism, projects that are ready to reach the Final Investment Decision would face unnecessary delays, which in turn slows decarbonisation efforts of the Australian Government.

Survey Questions (please respond online)

33. Do you agree with the proposed transitional arrangements outlined?
34. Do you agree that existing projects (from expired method) should be able to transition to the new method, using a similar approach to landfill gas projects (e.g. crediting period reduced by the number of years between the making of the new method and transition date)?
35. Are there other matters that should be included in transitional arrangements?
36. Do you have any alternative suggestions as to how AWT projects can preserve newness during the remaking process in the absence of a recognised notice of intention?
37. What projects/activities would you like to undertake now before the new method is made?

4.11 Extend deferral of start of crediting period

Previously, only an 18-month deferral period was allowed for AWT projects. This is the default deferral period set out in s69(5) of the CFI Act. However, AWT projects are large infrastructure investments often involving long development approval processes and long lead times to obtain finance and construct assets. In many States, the process to obtain planning and environmental approvals and construct an AWT facility can be 3-7 years. Construction alone in some cases can be 3-5 years.

It is proposed to request a 5-year deferral period for AWT projects recognising the time involved in obtaining finance and necessary government approvals. For example, AWT projects are large infrastructure projects that generally require state planning approval not just local government

approval, environmental approvals, construction time, potential time for amending proposals, amongst others. The planning approval processes alone often take between 1 – 3 years for projects similar to AWT projects, even before construction starts. Further, the ERAC's 2025 AWT method review report found that submissions to the public consultation provided sufficient evidence the 18-month deferral period was inadequate due to time required for environmental and other approvals.

Industry experience is that a 5-year deferral period would not encourage delay as it is in the project proponent's interest to progress to being operational as fast as possible – longer time means more costs. The Carbon Capture and Storage method 2021 sets the precedent for a 5-year deferral period, which was agreed to on the same grounds.

Implementing a 5-year deferral period would require an amendment to the *Carbon Credits (Carbon Farming Initiative) Rule 2015* (CFI Rule).

The ERAC consider the crediting period and deferral period together when assessing additionality, that is, AWT project with a 25-year crediting period and 5-year deferral period be able to satisfy additionality requirements over that timeframe.

Survey Questions (please respond online)

38. Do you agree that the CFI Rule should be reviewed to extend the deferral period to 5 years?
39. Are there other deferral period lengths that you think should be considered? If so, please provide details.
40. Do you have evidence to support your preferred deferral period?

4.12 Interaction with the Safeguard Mechanism

Under section 20(2) of the CFI rule, a project is not eligible for ACCUs if it involves abatement from a facility covered by the Safeguard Mechanism. For AWT projects, this means a project that diverts waste from a Safeguard facility would generally not be eligible to be registered as an ACCU Scheme project because it involves abatement of covered emissions of a Safeguard facility. The project may be eligible in respect of waste diverted from a non-safeguard facility if that waste is treated separately. This ensures that emissions reductions credited through the ACCU scheme are additional to those achieved through the Safeguard Mechanism.

This is an important matter that requires resolution during the making of the AWT method.

Under the CFI Act, the policy intent of both the ACCU Scheme and the Safeguard Mechanism is to reduce Australia's greenhouse gas emissions. Landfills do not control what waste they receive. This means, a Safeguard facility may not know when waste is 'diverted' away from it. The facility will only have visibility of what it is due to receive based on its contractual arrangements. The only way a Safeguard facility can 'divert' waste is by cancelling contracts or refusing to take waste.

Similarly, the receiving facility may not know if that waste was diverted from a Safeguard facility and requires special accounting.

Under current policy settings, diverting waste from a Safeguard landfill may not result in double counting because the landfill's Safeguard baseline emissions automatically reduce as the waste received reduces.

It is ARRC's position that waste diverted from any landfill, including Safeguard landfills, should remain eligible for crediting under the new AWT method when it occurs at a separate non-safeguard facility. Excluding waste purported to be diverted from Safeguard landfills would materially reduce

the effectiveness of the new AWT method, distort waste markets, and create outcomes inconsistent with the objectives of the ACCU Scheme and the Safeguard Mechanism.

Survey Questions (please respond online)

41. Do you agree that waste diverted from any landfill, including Safeguard landfills, should remain eligible for crediting under the new AWT method when it occurs at a separate non-safeguard facility? And if so, how would you demonstrate that ACCUs generated from waste that is diverted from a Safeguard landfill are additional and do not double-count emissions reductions?
42. Does an AWT facility know which landfill the waste was diverted from? If yes, how would you prove? If no and/or can vary, how would you demonstrate this?
43. What impact does the current arrangement have on your existing or planned potential AWT project? Please provide details.
44. Are there alternative approaches that would better incentivise additional emissions reductions? If yes, please provide details.

4.13 Additionality of anaerobic digestion or composting of FOGO

Increasingly Australian jurisdictions are introducing legislation to require source separation and collection of FOGO and its diversion from landfill. However, subsequent management is not typically specified. This raises questions as to whether the new AWT method should include specific requirements for projects to demonstrate their compliance with the Additionality OIS.

ARRC asserts that the CER assess regulatory additionality at point of project registration for all projects under the ACCU scheme, making additional method specific requirements relating to Additionality under the AWT Method unnecessary.

Survey Questions (please respond online)

45. Do you agree that no specific requirements relating to the assessment of regulatory additionality under the AWT method are necessary? If no, please provide details.
46. Is there legislation in the jurisdiction in which you operate that may impact on additionality? If yes, please provide details.

4.14 Eligible waste

Eligible waste is proposed to be defined as types of waste that would have otherwise gone to landfill. To expand the new AWT method's scope, and to future proof the method while continuing to meet the OIS, it is proposed project proponents would be required to verify by provision of evidence at time of registration that the type of waste was going to landfill and is identified as an opportunity for diversion.

It is proposed that meeting eligible waste criteria could be demonstrated by project proponents providing evidence to demonstrate one of the following *(*wording is to demonstrate intent for DCCEEW legal team drafting)*:

1. That the material was going to landfill for >12 months, or
2. That the material is already being diverted from landfill by a waste management company, and the diverted material was previously being treated in line with the approved uses in the AWT method, or
3. Is required to be sent to landfill by regulation, but can be diverted using technologies approved under the AWT method (i.e. doesn't need the 12 months record), or

4. For material that has been disposed of in landfill for less than 12 months, the proponent can demonstrate to the satisfaction of the Regulator that the waste would continue to go to landfill due to:
    a. the location of the waste material being a long distance from markets such that the cost of transport exceeds the value in the market
    b. the cost to treat the waste to access recycling or re-use markets is prohibitive
    c. contamination or damage to the material such that it renders it unfit to recycle or reuse

47. Do you support including specific requirements in the new AWT method requiring projects to demonstrate compliance with the Additionality OIS by demonstrating that the type of waste would have been disposed of to landfill in the normal course of activities, should an alternative waste treatment project not have been available?

4.15 Definitions

ARRC proposes several changes to definitions contained in the 2015 AWT method and to include new terms. These changes are to improve the new method's flexibility, make it technology neutral as much as possible, and to provide clarity of the new method's scope.

The table sets out the term and the policy intent. It is not intended as legal drafting.

Term	Explanation
Eligible waste treatment technology	Eligible waste treatment technology means the following: - Enclosed composting technology - One or more anaerobic digesters and the transfer of biogas to a combustion device for destruction **or to a system for upgrading to biomethane** - process engineered fuel manufacture - **advanced thermal treatment** The intent is to increase the new method's scope and make it flexible to accommodate future technologies. The technology type of advanced thermal treatment could produce energy, fuel or materials like biochar. The emissions reduction or net abatement is calculated against landfilldisposal as the baseline, that is, emissions avoided when waste is diverted away from landfill.
Process Engineered Fuel	Process engineered fuel manufacture means a process by which a combustible fuel is produced from mixed solid waste that would in the ordinary course of events otherwise have gone to landfill. It must include at least one of the following processing steps to meet a fuel specification such as, but not limited to: - sorting waste - separating recyclable materials - reducing waste volume and/or size - screening, blending, mixing, compressing, centrifuging, drying, aerating, compacting or removing contaminants - and/or another clearly identifiable processing step, which could occur at any point in the production process.

	Pre-sorting or sorting would be allowed at any point in the fuel production process and at one or multiple sites and would be considered within the project boundary.
Advanced thermal treatment	Advanced thermal treatment would involve applying a process such as gasification, pyrolysis or vitrification, which uses heat to transform waste materials into energy, fuel and/or materials, for example, low carbon fuels, methanol, ammonia, plastics, oils, biochar or other equivalent low carbon content products. Adding this additional technology type would assist in future proofing the method and provide the potential for different and new technologies that divert waste from landfill to be eligible under the new AWT method. It would not consider emissions reductions resulting from the use of these products. Other legislation that could be used to inform the future definition include the *Future Made in Australia (Guarantee of Origin) Act 2026* and its supporting rules.
Mixed Solid Waste	The ARRC proposes to focus the new AWT method on treating mixed solid waste that would otherwise go to landfill, rather than focusing on the types of waste. To control for additionality, it is proposed that a new requirement be added to verify that the waste stream in that jurisdiction was going to landfill and is identified as an opportunity for diversion. An example of wording to demonstrate intent: Mixed solid waste means municipal solid waste, commercial and industrial waste, or construction and demolition waste that would in the ordinary course of events have otherwise been disposed to landfill.
Commercial and industrial waste	The definition in the 2015 AWT method would be improved by providing clarity on what sources of waste are eligible as commercial and industrial waste. It was also identified that any residual wastes from transfer station operations may become classed as commercial and industrial waste, including from domestic waste that entered the facility. There is a considerable amount of recyclable material in commercial and industrial waste which could be diverted to a higher order use (e.g. recycling). It is proposed the definition be improved by clarifying eligible commercial and industrial waste is waste that cannot be viably reused or recycled in the normal course of activities, which is generated from fixed point sources related to: manufacturing, wholesale, retail, professional services health, education and administration sectors, residual waste from transfer stations and residual waste from materials recovery facility operations.
Construction and demolition waste	Like the commercial and industrial waste definition, with emerging recycling technologies, there can be a considerable amount of recyclable material in the construction and demolition waste stream. Examples of materials that cannot be viably recycled but can be diverted from landfill via the AWT method include timber, textiles and other organic materials.

	To ensure materials are going to the highest order use first, such as recycling, it is proposed eligible construction and demolition waste is waste that cannot be viably recycled in the normal course of activities.

Survey Questions (please respond online)

48. Do you support the proposed revisions to the eligible waste treatment technology definition under the new AWT Method? If yes, what benefits do you see from the change, and how will the definitions meet the OIS?
49. Do you agree with revising the process engineered fuel definition? If yes, what benefits do you see from the change, and how will the definitions meet the OIS?
50. Do you agree with adding an advanced thermal treatment definition to the future AWT method to open up opportunities? If yes, what benefits do you see from the change, and how will the definitions meet the OIS?
51. Do you agree with revising the mixed solid waste definition to open up opportunities and focus on diversion from landfill? If yes, what benefits do you see from the change, and how will the definitions meet the OIS?
52. Do you support the revision of the commercial and industrial waste definition to provide further clarity? If yes, what benefits do you see from the change, and how will the definitions meet the OIS?
53. Do you support revision of the construction and demolition waste definition to provide further clarity? If yes, what benefits do you see from the change, and how will the definitions meet the OIS?
54. Do you support revision of the eligible waste definition to open up opportunities and assist in futureproofing the method? If yes, what benefits do you see from the change, and how will the definitions meet the OIS?
55. Do you agree that by revising the definition of Process Engineered Fuel and adding Advanced Thermal Treatment as an additional category would allow for the future AWT method to cover many Energy from Waste and Waste to Fuels activities while also ensuring the method doesn't overlap with other methods and mechanisms? If yes, what benefits do you see from the change, and how will the definitions meet the OIS?

5.0 Appendix

Assistant Minister Wilson's letter appointing ARRC as the proponent to lead a future AWT method's development.

THE HON JOSH WILSON MP
ASSISTANT MINISTER FOR CLIMATE CHANGE AND ENERGY
ASSISTANT MINISTER FOR EMERGENCY MANAGEMENT

MS25-001204

Ms Haydee Forster
Chief Executive Officer
Australian Resources Recovery Council (ARRC)
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BARTON ACT 2600

Haydee.forster@ausrrc.com.au

Dear Ms Forster

Thank you for your interest in the Australian Carbon Credit Unit (ACCU) Scheme's expired Alternative Waste Treatment methodology determination 2015 (AWT method).

I am pleased to inform you that I have decided to prioritise a new AWT method based on advice from the Emissions Reduction Assurance Committee (ERAC) that activities under the method (excluding enclosed composting) would be suitable for inclusion in a new method.

I am also pleased to inform you that I have decided that ARRC will be the proponent for development of this method.

To assist with this process, I attach a draft guide for developing an ACCU Scheme method. This guide may be refined by the Department of Climate Change, Energy, the Environment and Water following feedback from method development proponents.

A member of the ERAC Secretariat will be available to assist you with this process. The ERAC Secretariat can be contacted at ACCUSecretariat@dcceew.gov.au.

I also provide overleaf some specific issues that will need to be considered when developing the method. This list is not comprehensive – it is likely that additional issues will be identified during the remake process.

Thank you for your interest in making a new method. I look forward to seeing the new method progressed.

Yours sincerely

JOSH WILSON

Enc Draft Guidelines for method development

cc: Minister for Climate Change and Energy, the Hon Chris Bowen MP

Specific issues to be addressed in remake of the Alternative Waste Treatment method

Issue	Source / Comment
Potential exclusion of enclosed composting activities	As identified in the periodic review of the method, the enclosed composting activity should be excluded from a new method due to tighter restrictions on application of compost to land and resulting common treatment (landfilling) of this compost. Alternatively, the proponent may consider other approaches that address Committee concerns relating to project emissions.
Potential inclusion of Source Separated Organic Waste (SSOW) method 2016 activities in a remade AWT method	The sunsetting review of the SSOW method recommended that SSOW activities be considered for incorporation in a remade AWT method. However - *additionality* of SSOW activities must be carefully considered in light of new requirements for separate collection of food and garden organics in several states, as well as potential regulatory requirements for composting or bio-digestion of these wastes. The outlet(s) for these wastes must also be considered given emerging contamination issues and potential for related impact on project emissions.
Updating of landfill gas (LFG) emissions and capture rates and other relevant matters	Several issues relating to baseline LFG emissions reporting must be considered as follows: • Landfill gas capture rates. In the AWT method periodic review report the Committee indicated that it considers that a remade method should ensure projects use the landfill gas capture rate in place under the National Greenhouse Accounts (NGA) at the time of reporting. For regions where a state-specific average capture rate is not available a national average or an alternative method may be used. Capture rates should be calculated in a way that prevents double-counting of oxidation. • Interaction with the new *Carbon Credits (Carbon Farming Initiative—Reducing Methane Emissions from Landfill Gas) Methodology Determination 2025*. • Emissions profiles of specific waste types that are covered by a remade AWT method. • Revisions to the accepted global warming potential (GWP) of methane.
Setting of Crediting Periods for activities under the method	An ACCU method must define Crediting Period(s) for activities available in the method. The Proponent should consider s.69(3) of the Carbon Credits (Carbon Farming Initiative) Act 2011 (CFI Act) as well as submissions relating to crediting period in the AWT method Periodic review. The periodic review found that extending the crediting period beyond the current 7-year period could be considered 'should more fulsome evidence gathered through the remaking process indicate a longer crediting period would still generate abatement that wouldn't otherwise occur.'

Inclusion of biomethane generation as an eligible activity	As identified by the Periodic review and earlier reviews, stakeholders have requested inclusion of a biomethane activity in an AWT method.
End management of digestate	As identified in previous consultations on the method, process emissions from end management of digestate should be included in calculations of emission reduction if emissions from digestate are significant.
Interaction with Safeguard Mechanism	A project that diverts waste from a Safeguard facility would generally not be eligible to be registered as an ACCU Scheme project because it involves abatement of covered emissions of a Safeguard facility. Further information is available at: Projects abating emissions from safeguard facilities | Clean Energy Regulator (Scenario 4). This is potentially a significant issue for remake of an AWT method. The Proponent should consider how a new AWT method will address this issue.
Improvements to calculation of abatement from anaerobic digestion	The proponent should consider a stakeholder suggestion to enable simpler measurement of methane generation potential by measuring the produced biogas, in a similar approach to that used in the Animal Effluent Management (AEM) method.
Extended accounting period	The proponent should consider changes to the extended accounting period in the expired AWT method. Stakeholders indicated that removing the extended accounting period would improve project financial viability and reduce administrative burden for both the Regulator and project proponents.
Extend deferral of start of crediting period	Stakeholders were strongly in favour of allowing a longer deferral of the start of the crediting period. Deferral of the start of the crediting period is addressed in the CFI Act and Carbon Credits (Carbon Farming Initiative) Rule 2015 (CFI Rule). The Department is considering revisions to these legislative instruments.
Other improvements	The proponent might consider other improvements to the method.