

Engage Victoria
Victorian Government
1 Treasury Place
East Melbourne VIC 3002

Re: Opposition to Proposed Waste-to-Energy Regulations and Cap Licensing Framework

To whom it may concern,

[Geelong Sustainability](#) is a multi-award winning not-for-profit community organisation and registered charity that supports residents of Geelong and surrounding regions to be more sustainable in their everyday lives. Since our establishment in 2007, Geelong Sustainability has become the region's leading sustainability group with extensive networks in community, government and business throughout Geelong and the Barwon region. We are recognised for our evidence-based innovative projects, which educate and support our community's transition to a net zero, circular economy.

We would like to express our deep concerns regarding the proposed waste-to-energy (WtE) regulations outlined in the Regulatory Impact Statement by the Victorian Government. While we appreciate the efforts to manage waste responsibly and transition to a circular economy, we are fundamentally opposed to the implementation of waste-to-energy schemes for several reasons.

The proposal to introduce a cap of one million tonnes annually on permitted waste for heat treatment in new waste-to-energy facilities is alarming. Despite the intention to strike a balance between industry investment and waste management, we firmly believe that waste-to-energy is not the solution. Incineration, as the chosen method for waste-to-energy production, poses grave environmental and health risks, contradicting the government's pursuit of sustainable practices.

The environmental concerns associated with waste-to-energy are significant. Incineration remains the most expensive and dirtiest form of WtE production, releasing higher levels of carbon dioxide per megawatt-hour than coal. This undermines efforts to combat climate change and contradicts the transition towards cleaner energy sources. Furthermore, the release of toxic air pollutants and the generation of toxic ash pose severe health risks to both workers and communities surrounding these facilities.

Waste-to-energy undermines the circular economy and resource conservation. Instead of embracing practices like organic composting that could avoid emissions and contribute to a circular economy, burning waste exacerbates pollution and depletes finite resources while destroying embedded energy. This approach directly stifles innovation, contradicts efforts to improve recycling, and entrenches a linear economy detrimental to our long-term sustainability goals.

We also wish to address the discrepancy in the proposed regulations. Limiting the cap and fees solely to new applications ignores existing facilities' impacts, representing an inconsistency in regulatory oversight. If the government acknowledges the potential harm these facilities pose by implementing a cap and fees, it begs the question: Why proceed with waste-to-energy schemes at all?

In conclusion, we urge the Victorian Government to reconsider the direction proposed in the regulatory framework concerning waste-to-energy. Instead, we advocate for more sustainable and environmentally friendly waste management strategies that prioritise recycling, composting, and circular economy principles.

We appreciate your attention to this matter and respectfully request careful consideration of the concerns raised herein.

Yours sincerely,

David Spear
Chairperson
Geelong Sustainability