Toxics Free Australia
Submission to the Legislative Council Economy and Infrastructure Committee
The development and expansion of waste-to-energy (WtE) infrastructure in Victoria

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[redacted]

Toxics Free Australia (TFA) is a not for profit, non-government organization (NGO) working for pollution elimination, protection of environmental health and environmental justice for all. Established in 2024 after the retirement of the National Toxics Network (and their 30-year history of environmental justice advocacy and research in Australia), TFA is a member of the International Pollution Elimination Network (IPEN) and is committed to a toxics free future.

As TFA's chair, Jane Bremmer also coordinates the Zero Waste Australia campaign, has participated in more than 10 years of civil society representation on the Federal Governments Industrial Chemicals regulatory committee, and works with a number of national and international organisations to support the objectives of a range of International Conventions, including the Stockholm, Basel and Rotterdam conventions as well as the Global Treaty on Plastic.

Terms of reference:

On 27 August 2025, the Legislative Council agreed to the following motion:

That this House requires the Economy and Infrastructure Committee to inquire into, consider and report, by August 2026, on the development and expansion of waste-to-energy (WtE) infrastructure in Victoria, including —

(1) the suitability of existing WtE infrastructure plans and policies, including –

(a) the impact of WtE projects on residential communities and transport infrastructure;

(b) annual caps on waste that can be used in thermal WtE processing;

(c) the regulatory framework to establish and manage WtE facilities;

(2) the impact of WtE, including from –

(a) separating recycling and organic material from WtE streams;

(b) nature and management of emissions, waste and ash byproducts;

(c) the cost-benefit of WtE generation to consumers and businesses;

(3) alternative waste management approaches and emerging technologies that also align with circular economy principles, having regard to the recommendations of the Environment and Planning Committee's 2020 Inquiry into recycling and waste management and the role of WtE in the Victorian Government's circular economy plan, including Victoria's landfill management, capacity and strategy;

(4) the adequacy of community consultation; and

(5) any other related matters

Forword

This submission makes the necessary distinction between thermal/combustion waste to energy technologies such as waste to energy incineration (both Moving Grate and Fluidised Bed technologies), Gasification, Pyrolysis and Refuse Derived Fuel burning, and non -combustion waste to energy technologies such as Anaerobic Digestion, Gas Phase Chemical Reduction (GPCR), Super Critical Water Oxidisation and other emerging non combustion technologies.

This submission will focus on the impacts of combustion-based waste to energy technologies given the Victorian Government legislation and associated framework is awarding *cap licenses* to waste to energy incinerators.

1. The suitability of existing WtE infrastructure plans and policies,

The Victorian Waste to Energy Framework 2021.

"Recycling Victoria recognises a role for waste to energy investment in Victoria and supports waste to energy facilities where they meet best-practice environment protection requirements, reduce waste to landfill, support waste avoidance, reuse and recycling, and demonstrate social licence with affected communities.

Thermal waste to energy technologies can help achieve Victoria's waste to energy goals if we have the right number and scale of facilities. To this end, Recycling Victoria

commits to placing a 1 million tonne per year cap on the amount of waste that can be sent to thermal waste to energy in Victoria to 2040. Recycling Victoria also commits to a review of the waste to energy framework in 2023."

The Victorian Government has been planning to award up to 3 million tpa of waste for incineration from the very beginning when developing this Waste to Energy Framework back in 2021. This was flagged very early on in Vic EPA and DEWLP consultations that we attended.

On the 11th December 2024, this policy was amended to permit the increase of cap licenses to 2 million tpa.

On the 25th July 2025, this policy was amended again to permit the increase of cap licenses to 2.5 million tpa.

Currently the Victorian Government has approved the incineration of 2.35 million tonnes of waste every year under their waste to energy scheme, enabled by the *Circular Economy (Waste Reduction and Recycling) Act 2021* and the Circular Economy (Waste Reduction and Recycling) (Waste to Energy Scheme) Regulations 2023.

The approval of cap licenses for a number of incineration projects in Victoria will see the Wollert and Sunbury projects become the largest waste to energy incinerators in Australia. The Victorian EPA has more than doubled the allowable volume for Cleanaway's Wollert project from 380 000tpa to 760 000tpa. The HiQ project planned for Sunbury also had its permissible volumes increased from 300 000tpa to 750 00tpa.

In addition, the Maryvale Energy from Waste facility, have already received approval for 710 000 tpa. This makes the total volume of waste allowed to be incinerated in Victoria 3.06 million tpa of waste and will deliver a climate bomb the size of 4.6 million tonnes of GHG every year.

This volume of waste incineration will also create approximately 765 000 tpa of highly toxic and hazardous waste ash requiring secure management and disposal. Despite Australia being a signatory to the Basel Convention on hazardous waste, Victoria appears to have no regulatory framework for the management and safe disposal of incinerator ash. It is well documented that such ash contains PFAS and other persistent organic pollutants making it unsuitable for reuse in a Circular Economy.

Further, projects not currently awarded a cap license, but still pending such as the Lara Waste to energy project, brings another potential 400 000 tpa of waste, together with numerous chemical recycling projects (utilising gasification and pyrolysis technologies) taking the potential waste burning volumes to well in excess of 3.5 million tpa expected to be burnt every year in Victoria. These facts make a mockery of this policy's claims that aimed to ensure that, "*Thermal waste to energy technologies can help achieve Victoria's waste to energy goals if we have the right number and scale of facilities. To this*

end, Recycling Victoria commits to placing a 1 million tonne per year cap on the amount of waste that can be sent to thermal waste to energy in Victoria to 2040."

This waste to energy framework relies on a number of claims that are not supported by evidence:

1. ***Supports waste to energy facilities where they meet best-practice environment protection requirements.***

The concept of "best practice" operations and environmental standards is dubious and highly subjective. There simply is no universal concept of "best practice environmental standards operations". The Australian government and other states refer to the EU Best Practice standards for waste incineration (EU BREF) which have already been proven to have failed all over Europe, the UK and US leaving a legacy of persistent organic pollution.

To date, the Victorian government has failed to require any Environmental Impact Assessment (EES), that would usually be afforded to such high-risk industrial pollution sources, to the waste to energy incinerator sector. Both WA and Victoria require these legislated high level, industrial regulatory assessments…but not Victoria?

> It begs the obvious question as to how the Vic government and Recycling Victoria is able to ensure "Best Practice Standards", without having access to the necessary data required under an EES, to measure these standards against.
>
> This fact raises serious questions about the development of this policy framework and the motivation behind the rush to expand waste to energy incineration in Victoria.
>
> In effect, the Victorian government has created an anti-competitive policy situation where the regulatory setting has been heavily tilted in favour of waste incineration at the expense of safer, more effective residual waste management and disposal technologies.

2. ***Reduce waste to landfill,***
   Waste to energy incineration may reduce the volume of residual sent to landfill but creates a more dangerous and hazardous waste stream in the process. Waste incineration generates significant volumes of hazardous waste ash (both

bottom ash and Air Pollution Control Residues) requiring secure class 5 hazardous waste treatment and/or disposal in landfill. The goal of reducing waste to landfill is far better achieved through investment in the front end of the waste management system where the value of waste resources is better captured and utilised, rather than at the end of the system where contamination and loss of valuable waste resources is assured.

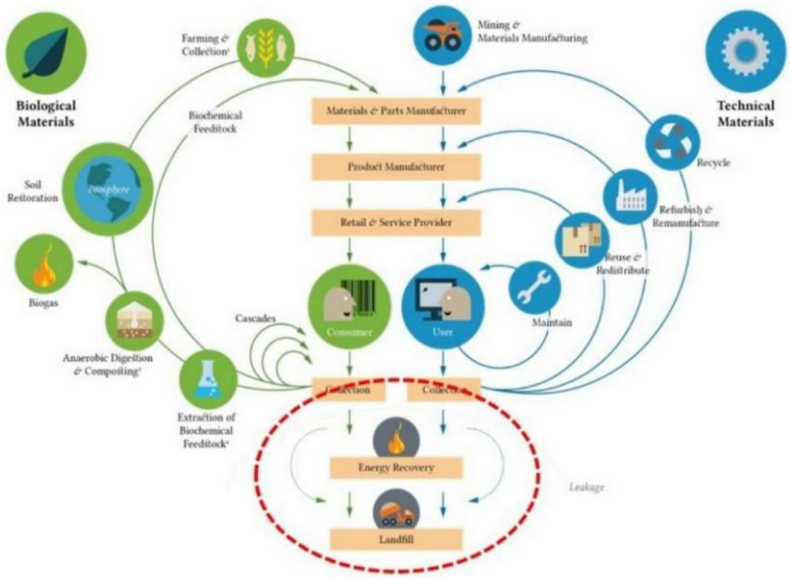
In 2022 our organisation engaged an independent research consultancy with experience in the assessment of the impacts of different waste management technologies to assess the best options for Australia's residual waste. This investigative report concluded that landfill with full pre-treatment (investment in the front end of the system, also known as Zero Waste policy) was the best option for Australia's residual waste management with waste to energy incineration being the worst outcome in terms of costs to our climate, air quality and health.

It is very telling that Victorian and indeed the Federal Government have not conducted such an assessments (particularly a full climate assessment) before enabling this one industry sector to manage our residual waste.

3. ***Support waste avoidance, reuse and recycling,***
Waste to energy incineration entrenches waste generation by creating contractual obligations to provide constant volumes of residual and other wastes, carried largely by local governments with zero experience in the legal, financial and compliance aspects of this industry. *Lock in or Put or Pay* contracts associated with this sector mean that local governments must feed the furnace for 30-40 years, representing a major impediment to adopting more sustainable and safer residual waste management technologies and practices.

The experience in Europe, UK and US demonstrates that waste to energy incineration has undermined their recycling, reuse and composting sector with direct adverse impacts for the Circular Economy.

Indeed, the Ellen MacArthur Foundation – a global expert in the Circular Economy - clearly identifies waste to energy incineration as leakage from the Circular Economy.



Reference: https://www.ellenmacarthurfoundation.org/towards-a-circular-economy-business-rationale-for-an-accelerated-transition

4. ***Demonstrate social licence with affected communities.***
   Victorian communities have consistently rejected waste to energy incinerator projects. No amount of well-paid community engagement consultants will or have managed to change this. Indeed, all across the Australia, host communities have consistently rejected waste to energy incineration. Despite the only 2 completed waste to energy incinerator projects in Australia located in WA's already industrial pollution burdened region of Kwinana and Rockingham, often used as the reference facilities for new projects in Australia, no social license to operate was ever sought or achieved.

   Currently, there is no social license to operate waste to energy incinerators in Victoria....or Australia.

(2) The impact of WtE,

The waste to energy incinerator sector relies on "residual waste" and is sold to the public and governments, as a last resort for waste that can't be recycled, composted or reused.

Yet how we collect, and source separate our waste, defines the volume and type of residual waste we generate. Currently our waste management system has been designed by and for the benefit of the waste disposal sector, not the more sustainable zero waste and circular economy sectors. For example, recycled materials are

deposited in a mixed waste bins collected by compact trucks. This method of collection generates residual waste simply by contaminating and destroying recyclable waste resources in the process of collection and compaction. Many residents across regional Victoria do not even have access to waste services and most public places and events only provide residual waste bins. While Victoria has been a leader in providing separate glass collection, the collection and source separation of waste has not improved and remains a key driver in residual waste generation.

(a) separating recycling and organic material from WtE streams

The separate collection of waste streams is key to a sustainable waste management system. The best practice system for ensuring high recycling outcomes, comes from providing separate collection for each waste stream. Paper and Cardboard, Plastics, Glass, Metals and Organics. Advanced Waste Sorting systems are being prioritised in European Nordic countries as their incinerator overcapacity has now caused major climate, health and resource impacts.

Advanced Waste Sorting systems for plastics and organics and residual waste, should be a priority for the Victorian Governments Circular Economy agenda, ahead of waste incineration, given that up to 48% of residual MSW can be further diverted from disposal.

(b) nature and management of emissions, waste and ash byproducts;

Our recent international report details the operational performance of waste to energy incinerators and their global impacts concluding that:

Waste Incineration is driving the triple planetary crisis – climate change, biodiversity loss and novel entities. Details of the impacts of their emissions and ash waste can be found in chapters, 3, 4 and 5 of this report.

The emissions, waste and ash byproducts of the waste to energy incinerator sector are so dangerous that they are the subject of at least 3 UN conventions. The Stockholm Convention relates to Persistent Organic Pollutants – a group of globally recognised pollutants for which there is no safe level of exposure, that bioaccumulate through the food chain and ultimately concentrate in the polar ice caps. Waste to energy incinerators are recognised as major sources of POP's.

The Basel Convention relates to the management and transboundary movement of hazardous waste and identifies waste to energy incinerators as primes sources of hazardous waste generation (APCr).

The Minamata Convention relates to Mercury and identifies waste to energy incineration in the top 5 global sources of mercury pollution.

Australia is a signatory to these conventions and is therefore obliged to uphold their recommendations and ratify their decisions in national legislation so as to deliver these protections at a state level.

Recent evidence in Europe has highlighted the widespread impact of Dioxin and Pfas contamination surrounding *best practice* waste to energy incinerators. Paris has particularly suffered with associated pollution also found in neighbouring school air conditioners, as well as in the soil affecting 12 million residents

Despite this, the Victorian government has not required any baseline monitoring prior to the approval of any waste to energy incinerator project, despite evidence strongly suggesting this is a critical assessment and regulatory component for any framework.

Climate impacts

The waste incinerator industry highly promotes itself as a solution to the climate pollution caused by landfills and poor waste management. However, the EU Commission's own BAT reference document says otherwise:

The energy production of waste-to-energy incinerators is low, according to the Best Available Techniques (BAT) Reference Document for Waste Incineration. It states that, *"the waste to electricity efficiency is very low, at $\eta \leq 0.3$, essentially meaning that at least 70% of the chemical functionality in waste is lost in the process of 'converting to cinders' (Neuwahl et al., 2019)."*

See *Van Neuwahl et al., 2019, chapter 3, 3.5 Energy consumption and production*.

In addition, published studies demonstrate that waste incineration is the highest carbon polluting energy source.

In Europe the high carbon pollution contribution of waste incinerators caused the EU Commission to remove all renewable energy subsidies for this sector in their Sustainable Finance Taxonomy, placing this industry in the same category as coal and nuclear. The EU is also considering including waste incineration in their Emissions Trading Scheme.

You can read more on the climate impacts of European waste incinerator here.

Health impacts of waste incineration

As detailed above, waste incinerator emissions to air and ash residues pose significant health and environmental impacts. The evidence in Europe of the widespread Dioxin, PFAS and heavy metal contamination of eggs, meat, dairy, soils, moss, vegetation and

waterways, as well as the evidence of pollution in of the air and indoor environments of schools within the vicinity of largescale best practice waste incinerators in Paris, demonstrates that this industry inherently comes with serious pollution that will imperil the environment and livelihoods of farmers and the agricultural industry. This will bring significant trade risks for Australia's meat, dairy and poultry industry especially, as Dioxin is lipophilic and attaches to fats.

The Public Health Association of Australia has twice reported on the waste incineration industry. Firstly, in a systematic review of the health impacts and secondly through an economic, environmental, and socio-political framework. The PHAA systematic health review found adverse health outcomes associated with waste incinerators, including increased adverse reproductive outcomes, neoplasia, congenital abnormalities, pre-term delivery, increased bowel cancer risk, soft tissue sarcoma and increased Non-Hodgkin Lymphoma. PHAA reports that, *"New incinerators should be located away from areas of food production"*, and that, "*Food grown near an incinerator should be avoided."* The review concludes that, "*While the results were not consistent across the literature, based on a precautionary principle there is insufficient evidence to conclude that any incinerator is safe."*

The second PHAA and Australian National University review found that, *"The transition to a circular economy with renewables-derived electricity attenuates the benefits of WtE-I. This, combined with grassroots opposition to WtE-I and its violations of social justice, renders future WtE-I projects unjustifiable. Public health practitioners need to promote primary waste reduction, recycling/composting, and other non-incinerator waste management practices in Australia."*

You can find more evidence and references to the public health impacts of waste incinerators in chapter 6 of our report Waste Incineration and the Environment.

The impact of waste incineration emissions on the environment and implications for the agricultural sector.

Waste incinerators emit a range of toxic and hazardous pollutants to the atmosphere and also into the ashes and wastewater produced. Please see chapter 3 of our report, Waste Incineration and the Environment which details these emissions and provides the EU and US current emissions limits in tables for the range of pollutants that are covered by the EU BREF and WID.

Unfortunately, there are a range of significant pollutants known to be emitted from waste incinerators for which there are no regulatory standards or APC methods to capture. PFAS is known to be emitted to the air and found also in the APC residues and bottom ash especially. This is significant in that that Veolia and other incinerator

proponents claim to simply reuse this bottom ash in construction materials. This will be a direct pathway to widespread PFAS contamination in the environment as has occurred in the Netherlands and other cities in Europe.

The quantities and fate of EU incinerator residues can found here and demonstrate that industry proponents (and some gov regulators) are deliberately downplaying the real volumes of this hazardous waste and its toxicity. This is a significant and underestimated hazardous waste stream that the Vic government currently has no regulatory framework for. It also demonstrates that waste incinerators do not eliminate landfill…they create hazardous waste landfills. As mentioned, the Basel Convention identifies waste incineration ash as a hazardous waste requiring specific regulatory oversight. It does not support the dilution of ash residues through cementation or other chemical/polymer treatments as is being promoted by the incinerator industry in Australia as a solution to their ash waste problem. The Australian government urgently needs to uphold the Basel Convention to protect the Australian environment and human health from waste incinerator ash.

In addition to the absence of regulatory controls for PFAS, Brominated Dioxins have also been identified as a major persistent organic pollutant found in the emissions and ash. There are currently no regulatory controls for brominated dioxins in the emissions or ash of waste incinerators.

Micro and Nano plastics are also known to be emitted from waste incinerators and again these dangerous pollutants have no regulatory controls for their emissions to air or deposition in the ash residues.

Thes significant pollutants of global concern cannot be ignored by government regulators. To accept that these pollutants are emitted from waste incinerators with no regulatory controls and despite this, open up the whole of Victoria to this industry, is reckless.

You can find more on the toxicity and dangers of waste incineration ash in chapter 3.3 of our report Waste Incineration and the Environment. More reports and evidence can be found about the incompatibility of using waste incinerator ash in the Circular Economy-

1. https://ipen.org/news/toxic-ash-poisons-our-food-chain

2. https://www.researchgate.net/publication/314458332_After_Incineration_The_Toxic_Ash_Problem

3. https://zerowasteeurope.eu/library/toxic-fallout-waste-incinerator-bottom-ash-in-a-circular-economy/

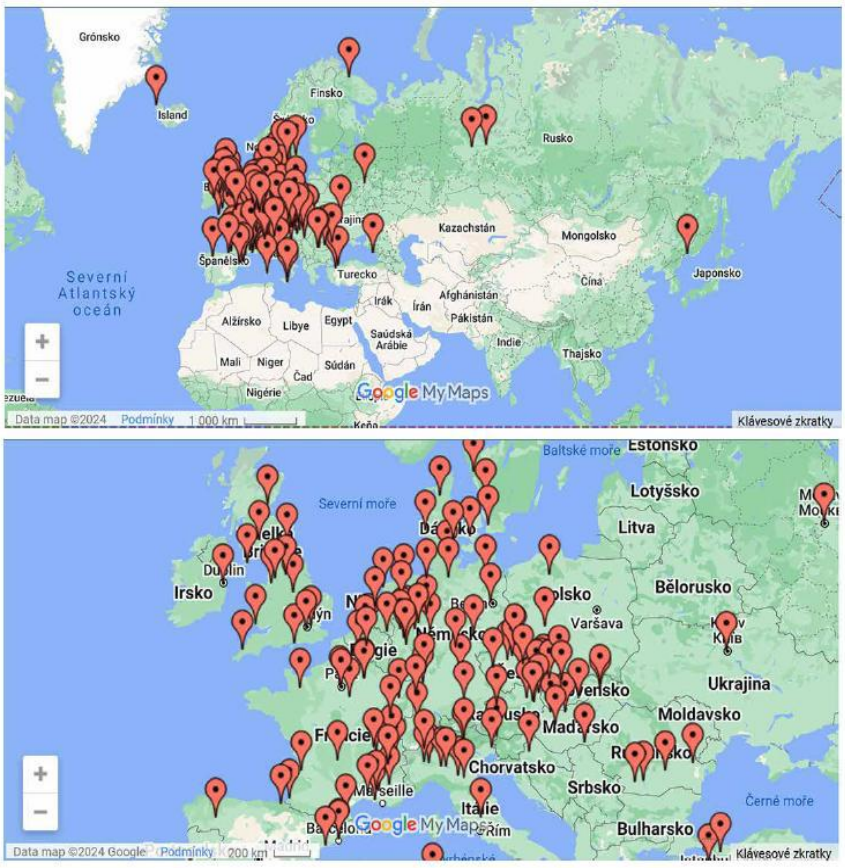
The threat of fires and explosions.

In addition to the environment and health impacts of waste incinerator emissions and discharges, this industry is known to be associated with significant fires and explosions. This represents a unique and dangerous scenario for any host community.

The high volumes of plastic waste and the complete unknowns of “residual waste” make waste incinerator fires particularly hazardous. Our materials production systems are increasingly embedded with petrochemicals, plastics and electronic wastes

containing toxic components, including batteries. When these burn uncontrolled in largescale waste incinerator fires, deadly pollution is generated.

European civil society organisations like Arnika have long documented fires and explosions in the waste incinerator sector. This evidence is alarming and shows that this is an industry prone to fires and explosions. Yet the Victorian government and waste incinerator industry continue to ignore this issue or provide any regulatory framework to reduce the risk and address the emergency response needs. Please see chapter 7 of our report Waste Incineration and the Environment which provides extensive evidence of the harm waste incinerator fires are causing all over the world, especially in Europe.



Figures 7.5 and 7.6: *Screenshots of the map on Arnika’s website with Google map showing waste incineration accident cases across Europe. This map is available also in English on Arnika’s English website (https://arnika.org/en/our-topics/waste-plastics/incinerator-accidents-in-european-countries) (Source: Arnika 2022).*

The true operational performance of "best practice" waste incinerators in Europe and the UK.

Waste incineration is not a safe industry as is often claimed. Even if you could ensure that every incinerator complied with their license conditions 100% of the time, they would still emit dangerous pollution. This is because some of the most dangerous pollution from incinerators is created outside the APC systems and stack. As the "cleaned" emissions exit the stack and cool down, they undergo a process known as the 'De Novo Synthesis', where dioxins reform in the cooling gases. This is one of the very reasons, along with *Other Than Normal Operating Conditions* (OTNOC) events (also known as start-up, shut-down and APC bypass events) why Europe has discovered the True Toxic Toll of waste incineration.

The widespread contamination of the environment by the waste incineration industry in Europe has caused civil society to demand an urgent moratorium on this industry.

As mentioned Paris has suffered significantly from their Best Practice waste incinerator with new evidence detailing impacts on surrounding schools.

Similar scenarios were found in the Netherlands where the local municipality immediately placed a moratorium on the industry. You can find more on the biomonitoring projects conducted by ToxicoWatch in Europe here. The evidence generated by ToxicoWatch is free of industry and regulatory bias and demonstrates widespread Dioxin, PFAS, heavy metal and other contamination of the environment within 15kms of waste incinerators.

In the UK – home to Veolia and the many incinerator plant references they promote – the story is just as alarming and more damning.

The true operational performance of the waste incinerator sector in the UK is a story of endless breaches of emissions limits and non-compliance. Yet Veolia continue to claim that their operations emit only clean air, steam and a bit of particulate matter, scandalously promoted by state regulators.

The reference plant for Tarago – the Staffordshire plant – publishes its daily average (and monthly) emissions limitshttps://www.staffordshire.veolia.co.uk/w2r-staffordshire-energy-recovery-facility/w2r-emissions-air-data

This data shows that despite averaging, the levels of hydrogen chloride, sulphur dioxide and oxides of nitrogen remain high. This is highly suggestive that the true emissions that the surrounding community will be exposed to are much higher than these averaged samples. People are not exposed to "averaged data" but to whatever is in the air at the time of exposure. If the averaged figures are so high, then the raw data must contain emissions recorded at much higher levels. This fact correlates with the regulatory non-compliance reports of many incinerators in the UK that are breaching their nitrogen

oxide emissions limits and points to a serious pollution problem that this industry is unable to control.

The UKWIN – a civil society environmental justice organisation in the UK- - have long been documenting the non-compliance and regular emissions breaches that this industry is causing in the UK which include many Veolia plants.

The ongoing non-compliant operations of the waste incineration industry is increasingly being reported publicly.

1. http://www.merton.tv/incinerator-breaches/ (details 78 incidents of non-compliance 2019 – 2025)

2. https://insidecroydon.com/2025/08/27/polluting-viridor-exposed-over-nearly-1000-licence-breaches/(details nearly 1000 breaches)

3. https://www.bbc.com/news/articles/c627evk7yrzo

1. https://observer.co.uk/news/national/article/toxic-fumes-from-waste-incinerators-breach-legal-limits-emissions(across the UK) *"The network of 53 incinerators in England breached their environmental permits 352 times last year. Annual performance documents obtained under freedom of information laws reveal that some incinerators were in violation of their permits more than 30 times in just one year."*

2. https://ukwin.org.uk/incinerators/library/Hull/237 (even plants using RDF – which is residual waste processed into a fuel – have significant emissions breaches as a result).

3. https://ukwin.org.uk/facts/The carbon pollution especially is high with civil society paying significantly for these costs.

More on the UK's waste incineration non-compliance over a decade can be found here and the adverse impact of waste incineration on UK's recycling sector here.

2c. Non-Compliance in the US.

The Energy Justice Network has long documented the non-compliance, climate, environment and health impacts of waste incineration in the US. Attached to this submission is a good analysis by EJN of the claims made by US incinerator proponents about expected emissions, compliance and safety.

Please see:

Quantitative Analysis of Projected Emissions from Proposed Miami-Dade County Trash Incinerator, *An Evaluation of Miami-Dade County's Claims that a New 4,000 Ton/Day Mass Burn Incinerator will Result in No Unacceptable Pollution Impacts, January 24, 2025.*

Recommendations

We recommend that the Vic government invests in sustainable Zero Waste infrastructure as opposed to the current Waste to Energy framework that is prioritising waste to energy infrastructure. The Victorian Circular Economy Act and associated waste to energy framework appear to prioritise waste disposal technologies and infrastructure such as Waste Transfer Stations – which merely bale residual waste prior to export for disposal. This plan represents an investment in a single waste disposal technology – waste incinerators – at the expense of the many more technologies, services and industries that support more sustainable waste management outcomes. In effect, this plan is anti-competitive and locks in a single technology when Europe and the US are diversifying and investing in Advanced Waste Sorting to reduce reliance on waste disposal, reduce climate pollution and the associated toxic air pollution and ash and meet their countries ambitions for a true circular economy.

Of particular concern is the approach that the South East Metro Melbourne local governments have entered into resulting in a business created for the sole purpose of entering into waste to energy incinerator contracts exclusively.

We recommend that the Victorian government invests in:

1. Mechanical Recovery Biological Treatment - for both residual waste treatment prior to landfill/storage, and as a way to generate energy. More here and attached.

2. Advanced Waste Sorting - is the direction that Nordic countries are now taking after overly investing in waste incineration….this is how they will reduce residual waste and avoid incineration. More here and here.

3. Non combustion technologies can safely dispose of both residual wastes and hazardous wastes, while also generating energy. Australia urgently needs this technology to safely manage the fastest growing waste stream - hazardous waste. Australia's plans to further invest in mining and extractive industries should come with a plan to safely manage their inevitable hazardous wastes.

Final comments:

In 2026, no waste should be going to landfill that has not been pre-treated to remove organic wastes and their methane generating potential, as well as stabilisation of remaining putrescibles and chemical contamination, reduction and stabilisation of all plastics, so as to render residual waste benign and safe for disposal in landfill or containerisation at significantly reduce volumes.

Investment in zero waste practices has the potential to significantly reduce the volumes of residual waste requiring disposal. Once this is implemented there is no justification for waste incinerators while safer and more effective waste disposal technologies described above, exist.

Given non-recyclable plastic waste is the predominant material found in the residual waste stream and that burning this waste is merely burning fossil fuels, addressing the proliferation of soft plastics and other non-recyclable plastic waste should be a priority.

Residual waste research facilities should be attached to every Materials Recovery Facility or Resource Recovery Facility, so as to generate the data and evidence needed to make producers design their materials, packaging and products for circularity. Continuing to ignore our residual waste and hide it in landfills and incinerators, is a pathway to more climate pollution, more wasted finite resources and a more contaminated environment.

We urge the Victorian Government to bring the expertise to the table in designing a truly sustainable and effective zero waste city model for Melbourne and across Victoria. It's time to put the waste disposal sector to the back of the room and let the zero waste and circular economy industries and advocates be heard upfront and supported by government to implement what Victoria and Australia can afford and deserve - a sustainable zero waste city model.