



No Northern Incinerator Wollert Inc

Legislative Council Economy and Infrastructure Committee

Enquiry into the development and expansion of waste-to-energy (WtE) infrastructure in Victoria

Parliament House,
Spring St, EAST MELBOURNE VIC 3002

Dear Committee Members,

Thank you for considering our submission.

We, No Northern Incinerator Wollert Inc, strongly object to the rapid expansion of WtE Incinerators in Victoria.

The protection public health directly and through the environment need to be a key consideration when assessing a single huge incinerator much less a whole industry. The climate impacts both on not creating CO2 and creating a safe place to live on new hot housing growth areas of Melbourne are also critical concerns.

We would like to invite you on a tour of our fabulous diverse community surrounding the proposed Incinerator site so that you can see for yourselves the family focused rapidly growing residential areas that were farmland just a decade ago.

Please do consider carefully this submission which we have worked on in the hope that no community is harmed by one of these Incinerators, when we can have taken action now for better ways to reduce waste.





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Acknowledgement of Traditional Owners and other Aboriginal Peoples

We acknowledge the Wurundjeri people, the traditional custodians of Wollert and the broader north of Melbourne and appreciate their long care of the country. The country was cared for with the view to keep the land healthy for future generations. We also acknowledge the very many Aboriginal and Torres Strait Islander people who live in the north of Melbourne – particularly those who live within closer proximity to the proposed WtE incinerator and their long care of many lands across this continent.

We appreciate that the word 'Wollert' comes from the Woi wurrung language word for possum. In that way we would like to continue to protect this special 'Wollert' from harm.

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We formed a community group in February 2024 to oppose the development of the proposed Wollert WtE incinerator. We are a non-partisan group, remaining steadfast in our efforts to safeguard our region from the potential harmful impacts of this development, prioritising the environmental and health concerns of the local community.

Our group has been active in Melbourne's north since formation, bringing together, supporting and educating our diverse community on this harmful proposal and recently incorporated to become No Northern Incinerator Wollert Inc. Our members come from a variety of work backgrounds including public health professionals. As a result of research and increased evidence, we object to all WtE incinerator proposals in Victoria



Figure 1 Poster painting of one of our young supporters at our General Meeting August 202

We have informed thousands of community members about the Wollert proposal, leading to thousands taking steps to oppose the proposal. A key member has sponsored a petition of over 6,350 signatures objecting to the incinerator, in addition to our Parliamentary petition sponsored by Bronwyn Halfpenny MP and encouraged 764 submissions to the EPA virtually all objecting to the proposal.

The community objecting to this proposal covers Melbourne's North, as the location is on current farmland, well within metropolitan Melbourne amongst priority residential development growth areas, near the edges of multiple jurisdictions. Thus, if permitted to proceed, it would have a huge impact on children and other current and future residents from a range of electorates. At a council level it is in Whittlesea and just over a km from Hume and close to Craigieburn. At the state level it is Northern Metro, in the electorate of Thomastown, within 2km of both Kalkallo and Yan Yean including Donnybrook. At the Federal level it is in the division of Scullin and again within two km of McEwan. We are hugely concerned for the folk who are yet to move to the area and have had no chance to find out about the incinerator plan and could easily find themselves living close to a project harmful to their families

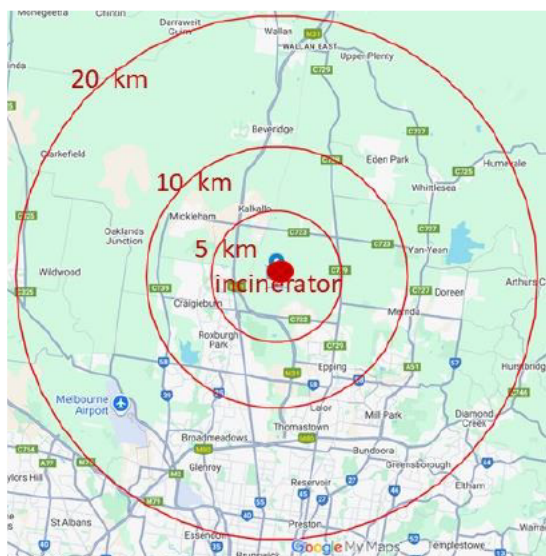


Figure 2 Google Map showing distance from the proposed Wollert incinerator



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Our voice is an important one as we:

- are a diverse group living in Melbourne's fast growing northern suburbs with the environment and the health of the community at heart.
- have invested in the community with our own homes and children, living in this rapidly growing residential area, prioritised by the Victorian Government.
- have members with extensive public health expertise
- have diligently worked through the Victorian Government process and have unfortunately found that there have been major anomalies in the processes.
- have participated in many levels engagement and found that WtE incinerator public statements and advice given by representatives of Recycling Victoria to all stakeholders including other government bodies and local councils aligns directly with waste industry spokes people rather than with independent experts.
- While the industry has many advocates, there is very little advocacy for the community. The industry advocates include proponents, waste industry associations, housing developers (who have been silent on the issue), councillors and council staff through quiet advocacy for the proponents and Recycling Victoria. The people of Melbourne's north and the people who have not moved there yet need to be heard.



Figure 3 No Northern Incinerator Community meeting 31st August 25- Expecting the announced EPA decision



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

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

The Wollert WtE proposal was referred to the minister and given an exemption for an Environmental Effects Statement. If prepared, this would have helped the community understand the potential impacts of the Wollert proposal. And as there are no such incinerators operational in Australia, and our community has not been informed by State or Local Government of the potential impacts, so our many concerns are based on evidence from overseas WtE Incinerators, combined with medical evidence from Australia and abroad.

- i) We are very concerned, horrified in fact, at the potential impact on the health of children, birth weight of children and premature death of other residents.

The potential air toxicity impacts, of the original proposal of burning 380,000 tonnes per year, is so significant internationally that the spread of nitrogen dioxide from the proposed incinerator has been modelled 'The Melbourne plume plotter models the distribution of flue gasses caused by emissions from the proposed incinerator at Wollert, Melbourne'¹. * Cleanaway's proposal is now twice the annual tonnage as is plotted.

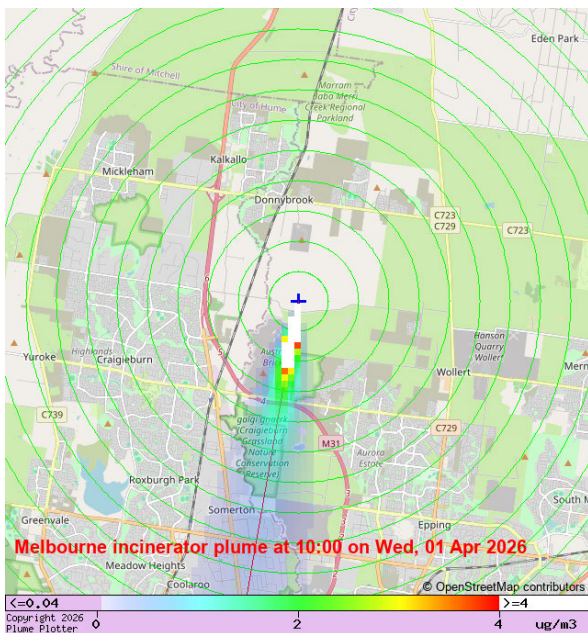


Figure 4 'The map shows the predicted pollution caused by the emissions from the proposed incinerator at Wollert, Melbourne. The red line shows wind direction. Green rings show distance (km). Colours show concentration of oxides of nitrogen at ground level. Maximum: 19.3 µg/m³. The potential cumulative impact for just one year is modelled here <https://www.youtube.com/watch?v=XFRjaDawvGg>

Do check out where the plume plotter shows the polluting plume would be right now

¹ <https://plumeplotter.com/melbourne/about.html> Plume Plotter predicts this fallout using AERMOD, which is one of the most widely used modelling systems for air pollution. It uses the latest local weather conditions and upper air data, which are obtained in real time. Since the incinerator does not yet exist, **Plume Plotter does not use real-time information about its emissions.** Instead, it assumes that the incinerator is operating continuously (8760 hours per year) and emitting pollutants at a constant rate. The emission rates assumed are the long-term **planned** emission rates that were specified by the incinerator developers in their planning application; the other parameters (e.g. emission velocity and temperature) used are also taken directly from the planning application.



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Nitrogen Dioxide (NO₂) Doctors for the Environment wrote in their Parliamentary inquiry report on pollution '**NO₂ acts a respiratory irritant, causing cough, shortness of breath, wheeze and asthma. Other health impacts of NO₂ exposure include atopy, reduced lung function, lower birth weight in newborns and increased risk of premature death**'. Existing data suggest that there is an effect threshold for the adverse effects on NO₂ on health. However, it is three to five times lower than the current NO₂ standard.² We have taken NO₂ as one example of a toxin and are also worried about many more.

- ii) We are concerned about the noise and smell of the proposed plant and the impact this has on all aspects of life – especially with young families.
- iii) We are concerned about the potential 600 truck movements per day, the additional pollution, noise and the hazards on our roads
- iv) We are concerned about our water quality – given the cumulative air quality impacts The cumulative impacts on our water catchments Greenvale and Yan Yean are of great concern especially as they are both within 15km of the planned incinerator.
- v) We are concerned about deaths and direct harm caused by the plant to workers and other community members

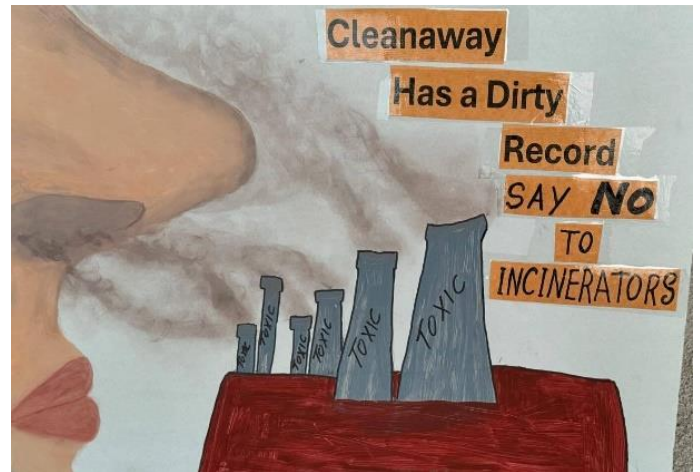


Figure 5 Community Poster expressing concern produced an event in Epping

Cleanaway has had nine deaths in Australian workplaces since 2022 – Five of these in the last two years!! This is a horrendous ongoing record which leads to the community's complete lack of trust³⁴.

² INQUIRY INTO THE HEALTH IMPACTS OF AIR POLLUTION IN VICTORIA

Doctors for the Environment Australia 22 April 2021

https://www.parliament.vic.gov.au/495f7a/contentassets/3586a4999e254ab7b01cf5004caf67b7/submission-documents/068_2021.04.22---doctors-for-the-environment-australia_redacted.pdf

³ Cleanaway death toll hits 5 in two years after fatality in Melbourne Australian Financial Review

<https://www.afr.com/companies/manufacturing/cleanaway-death-toll-hits-5-in-two-years-after-fatality-in-melbourne-20251218-p5nopn>

⁴ Australia: Worker dies at Cleanaway's Ravenhall waste facility

<https://www.wsws.org/en/articles/2025/12/27/mpnz-d27.html>

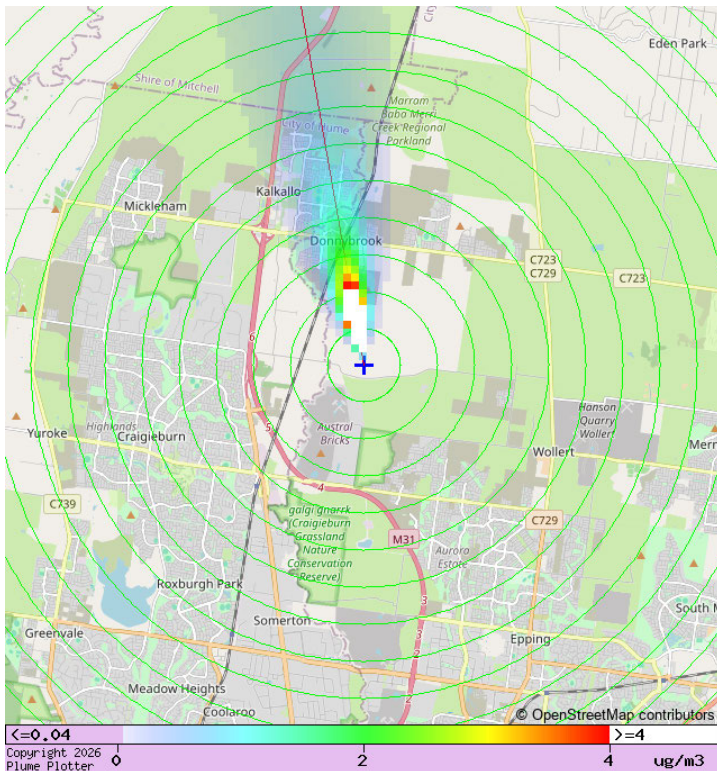


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- vi) We are concerned about our property values – who would want to live in an area where they know has a huge WtE incinerator.
- vii) We are worried about the fires or other emergencies occurring – especially given the lack of road infrastructure in Donnybrook and northern Wollert. The community feels like a ‘sitting duck’ with no way out. Battery fires have been surging and are a now a huge hazard in waste trucks and facilities⁵
- viii) With Dumping of rubbish and soil in the area an existing problem, we see trucking in an additional 760,000 tonnes of rubbish and then trucking out toxic ash and fly ash – increasing the potential harms of rubbish in the environment
- ix) We are concerned about our natural environment – the trees, creeks and our remaining growling grass frogs and sun moths.



Figure6 Community Poster Painting - Appreciating Wollert



Melbourne Plume Plotter

Melbourne incinerator plume at 18:00 on Thu, 02 Apr 2026⁶

Showing this image at a different time to the image on page 4 as there is never a time that there wouldn't be a plume – the air always goes somewhere. At the moment it would be going over Donnybrook.

⁵ Industry survey: Battery fires in waste & recycling June 2024 <https://acor.org.au/wp-content/uploads/2024/06/240603-ACOR-battery-fire-survey-summary.pdf>

⁶ Melbourne Plume Plotter <https://plumeplotter.com/melbourne/>



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

Public Health and the precautionary principle need to be our overriding consideration.

There is no known safe level of incineration of waste⁷. Waste incineration, in all its guises, should not become embedded in the waste management systems of Victoria.

Given this we have also found that the Victorian ‘cap’ system is designed to protect investments, rather than any community safeguards, and is completely opaque both in terms of quantity and in terms of how it was allocated, The National Waste Expo of October 2025 was informed by Recycling Victoria, promoting only business certainty.

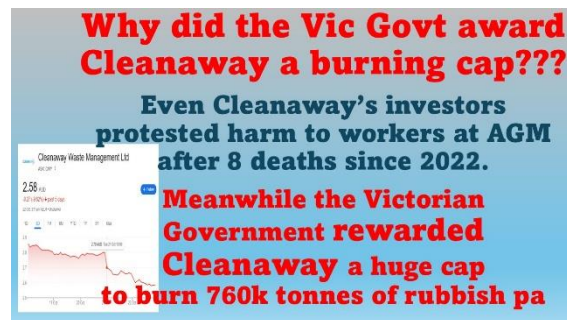
At the beginning of our Incinerator process in February 2024 (despite it being four years after the publication of the research referenced above) we were assured at meetings by authorities that the existing cap across the state would be a safeguard we could rely on. Then came the news on 17 Aug ‘25 ‘The Head, Recycling Victoria has determined and issued (*additional*) 7 licences totalling 2,350,000 tonnes per annum ‘. Cleanaway Operations Pty Ltd, the proponent of the Wollert Incinerator proposal, was at the top of the list, and was ‘awarded’ a Cap amount of 760,000 tonnes per annum⁸ double the original annual tonnage for the plant despite its deplorable safety record. This announcement was made without any public documentation on decisions. Requests have been made for the rational, but information has not yet been forthcoming⁹.

Cap licences issued

Recycling Victoria has concluded the application process for thermal waste to energy cap licences. The Head, Recycling Victoria has determined and issued 7 licences totalling 2,350,000 tonnes per annum to the following waste to energy facility operators, subject to conditions that each licence holder must meet.

Licence holder	Date of issue	Cap amount (tonnes per annum)
Cleanaway Operations Pty Ltd	17 August 2025	760,000
HIQ EFW Victoria Pty Ltd	17 August 2025	750,000
Knox Transfer Station Pty Ltd	17 August 2025	15,000

Figure 7 No Northern Incinerator Wollert Facebook Post 23rd October 2025 **The Victorian Government rewarded SNEAKY Cleanaway a cap licence even as its own investors protested at the shocking harms of Cleanaway including 4 worker deaths in the last 15 months”**



The Australian Financial Review reported on the Cleanaway AGM protest¹⁰.

⁷ ‘based on a precautionary principle there is insufficient evidence to conclude that any incinerator is safe.’ Australian and New Zealand Journal of Public Health Volume 44, Issue 1, February 2020, Pages 40-48

The health impacts of waste incineration: a systematic review <https://www.sciencedirect.com/science/article/pii/S132602002300732X>

⁸ Waste to Energy Scheme licences Under the Waste to Energy Scheme, Recycling Victoria issues 2 different licences - cap licences and existing operator licences. <https://www.vic.gov.au/waste-energy-scheme-operating-licences>

⁹ LEGISLATIVE COUNCIL NOTICE PAPER No. 157 Thursday, 5 March 2026 <https://www.parliament.vic.gov.au/493228/globalassets/house-paper-documents/house-paper-7084/np157.pdf#:~:text=dated%2019%20November%202025%2C%20tabled,allow%20sufficient%20time%20to%20respond%3B>

¹⁰ Australian Financial Review <https://www.afr.com/.../cleanaway-gets-investor-rebuke-on...>



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

The framework that is supposed to be in place appears to be in flux, with the abolition of Recycling Victoria, the lack of accountability and transparency of processes to date and a base of Victoria's 'Circular Economy Plan', which, by specifically including WtE incinerators, contradicts UN framework and differs from the Australian Federal Framework.

From our experiences, the framework safeguards, appear to be in place for industry certainty rather than for community and planetary health.

Here are the steps we have encountered so far, giving us no confidence in the existing processes as a means of fair assessment.

Environmental Effects Statement.

Exemption given for the original Wollert Statement – making it difficult for the public to have independent information to progress on.

Cap License RV

This process is opaque at best and hugely concerning to our community. As documented in the previous section – the total additional cap was calculated and Cleanaway's cap awarded for twice the annual tonnage as its original application. The basis for this is still hidden from us. There are multiple applications to gain the details of the process – but although the cap was awarded in August 2025 – no public information has yet been disclosed. At the Australian Waste Expo, Recycle Victoria gave a presentation on their assessment criteria – sadly it was only given in generalities. When one of the criteria for being awarded a cap was Health and Safety, a member of No Northern Incinerator Wollert asked how many workplace deaths would have been required to exclude Cleanaway from the process. No specific answer was given in line with the lack of specifics for all of the criteria.

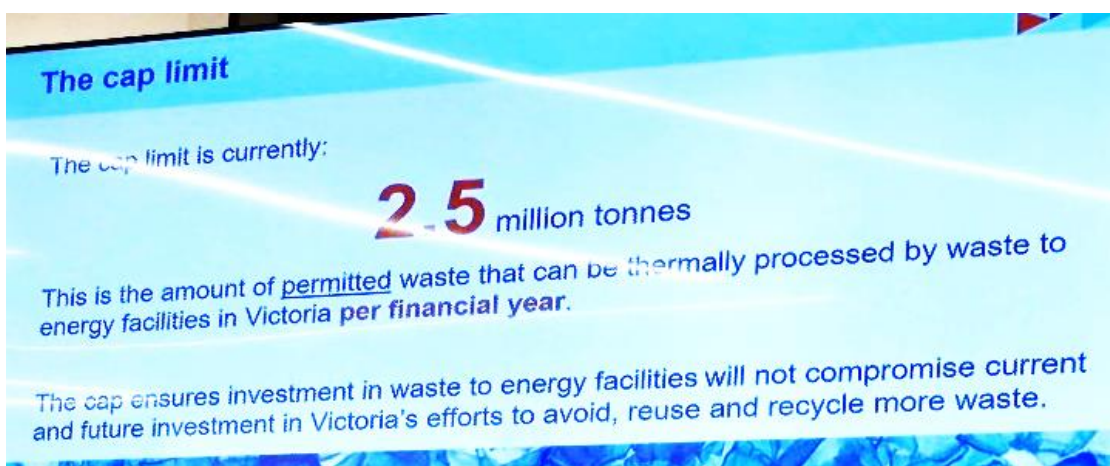


Figure 8 Recycling Victoria presentation 29 October 2025
Australian Waste Expo Conference 2025 'The cap ensures investment in WtE facilities will not compromise current and future investment ...'



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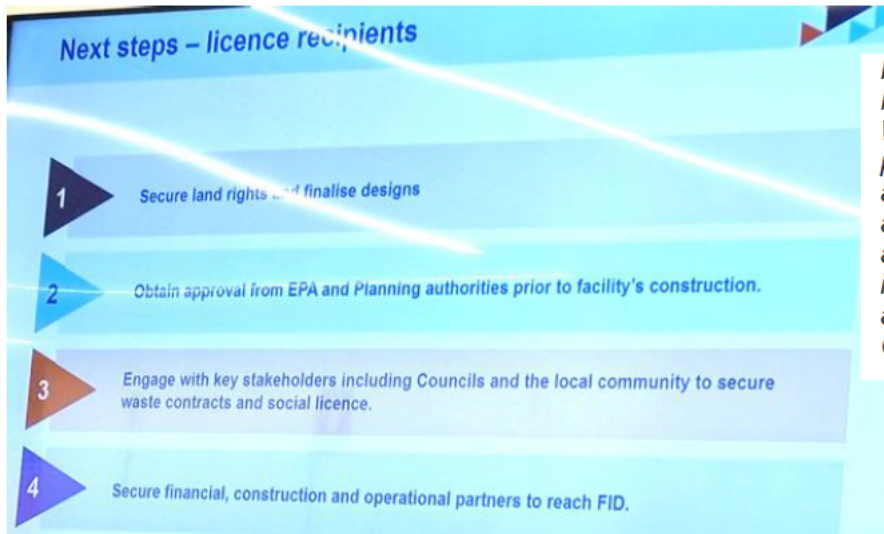
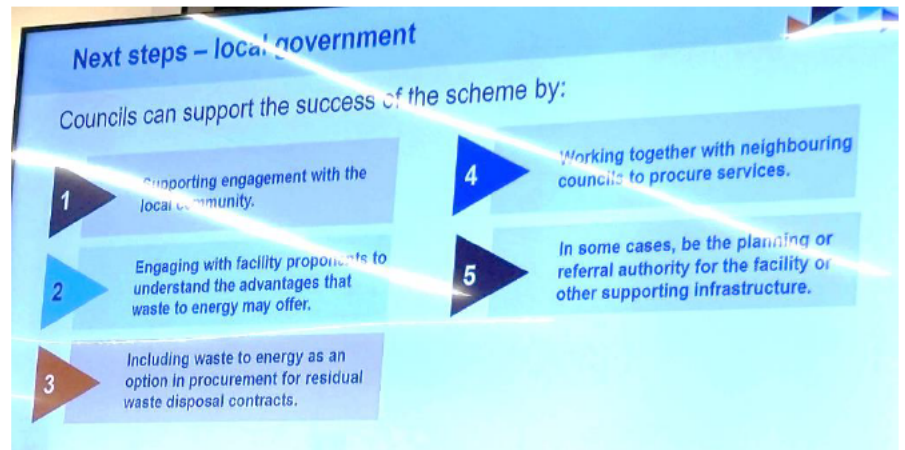


Figure 9 Waste Expo October 2025 Recycling Victoria presentation on WtE & the cap process. The processes described excluded any assessment or evaluation – Every aspect is focused on 'obtaining approval'. This would be normal for industry – but this shows lack of accountability to be our Victoria Government

Figure 10 Recycling Victoria presentation 29 October 2025 Australian Waste Expo Conference 2025 Councils can support the success of the scheme by ...'



After seeing this presentation Fig 9 we understood why members of our group were asked by both Whittlesea Councillors and Whittlesea Council staff to engage with Cleanaway the proponent of the Wollert WtE incinerator plan.

We as community members could see how the State government and Councils were working together to push this scheme through without consideration of the local community and the larger health and environment impacts of the actions. This type of approach is what we expect of industry advocacy but not of our state government.

As a group we want Victoria to be protected from WtE incinerators. As an interim step to cast a light on the cap process at minimum we recommend an Auditor General's investigation.

Development License EPA

We jumped high over the hoops participating in EPA processes exceeding participation of any previous process in the state, with our group nearly the only means of community members discovering the consultation process. This resulted in 764 submissions to the original licence application and the production of an independent report from Mosaic Lab, independent consultants showing all of the questions that remained and that there was no social licence for the project. Disappointingly, the EPA did not undertake the process as we



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had been informed, in terms of timing, questions answered and the actual criteria of assessment. The lack of transparency, of processes and standards leaving us to conclude we cannot trust their ability to assess this proposal, much less monitor any incinerator that would be developed.

- i) **The development License decision time frame was stretched to triple the stated time frame (from four, to over 12 months), leaving stakeholders in a state of uncertainty, and shocked when it was specifically extended at Cleanaway’s request and then no decision was made. This combed with other anomalies, further reduced confidence in the EPA assessment system.**

We were informed that the EPA decision time frame was to be four months -to either issue or if Cleanaway could not demonstrate the requirements at that time, it would be refused.

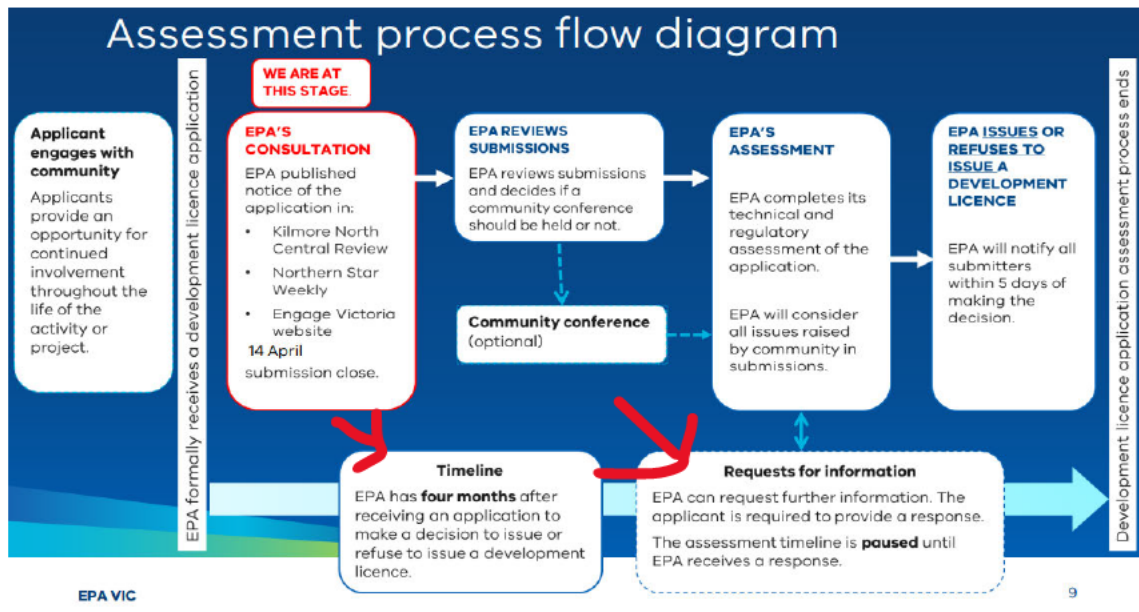


Figure 11 Table Extract of information emailed from EPA, 5th March 2024

There was no communication from the EPA after the four months had been reached. In February 2025 after approx. 6.3 months (accounting for paused times), it was announced that the decision would be made in 'Early 2025'. Then, at the end of July 2025, 12 months after the initial announcement (accounting for paused times), it was announced that the decision announcement would be made in another month at the request of Cleanaway.



Figure 12 Community members outside an early Cleanaway session in 2024 part of the long EPA Process



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EPA Timeline Published on Engage Victoria ¹¹	Timing
Development licence and planning permit submission period open 20 February 2024	Day 0
Q&A closes 10 April 2024	
Development licence submission period close 14 April 2024	
RFIs issued - statutory clock paused 11 April 2024 - 3 May 2024	Pause of 23 days
In-person Conference of Interested Persons 5 pm, Thursday, 20 June 2024 - 9 pm, Thursday, 20 June 2024	
Online Conference of Interested Persons 6 pm, Tuesday, 25 June 2024 - 9 pm, Tuesday, 25 June 2024	
Conference report published 15 August 2024	
RFI issued - statutory clock paused 15 August 2024 RFI responses received 11 October 2024	Pause of 58 days
Second submission period 28 October 2024 - 19 November 2024	
RFIs issued - statutory clock paused 7 November 2024 RFI responses received 24 January 2025	Pause of 79 days
RFI responses received 24 January 2025	
*EPA's decision on this development licence application is due to be published in early 2025 ...' Published 5 February 2025 (not recorded on timeline)	Days 352 Less paused 160 Total 192 Months 6.3
*EPA's decision timeline for this application has been extended to 30 August 2025 at the applicants' request. This is to allow them to confirm outcomes from Recycling Victoria's Waste to Energy cap licence process.' Published 30 July 2025 (not recorded on timeline)	Days 526 Less paused 160 Total 366 Months 12
EPA assessment Ongoing	
'EPA makes a decision ' 30 August 2025	Days 558 Less Paused 160 Total Days 398 More than 13 months
Development Licence application withdrawn 27 August 2025	Just about 13 months

*Information directly sourced from Engage Victoria Updates¹² not listed on the timeline

Then after 13 months the EPA announced it had not made a decision, but that due to the decision of Recycling Victoria of rewarding Cleanaway with the largest cap licence of the state, Cleanaway withdrew their application in order to resubmit a larger one at a later date.

Virtually all of this process happened before any cap was allocated to Cleanaway.

¹¹ <https://engage.vic.gov.au/project/cleanaway-operations-pty-ltd-app024914/timeline>

¹² <https://engage.vic.gov.au/project/cleanaway-operations-pty-ltd-app024914/updates>



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- ii) **The community jumped enormous hoops and reviewed complex documentation to object to this proposal, despite the lack of independent advice.**

There is no objective information supplied with the only information sessions on the content being provided by the proponent (Cleanaway). The EPA provided information on the EPA process but no independent information on the proposal or measures that could be referenced.

MERC Development Licence Public Documents	MB
Development Licence Applicationpdf 9.06 MB	9.06
Appendix B Waste Feedstockpdf 11.55 MB	11.50
Appendix C Design drawingspdf 13.52 MB	13.52
Appendix D Community and Stakeholder Engagementpdf 7.62 MB	7.52
Appendix E Best Available Techniques and Technology Assessmentpdf 753.01 KB	0.75
Appendix F Hazardous Substances Industrial Hazardspdf 1.07 MB	1.07
Appendix G Ecology Assessmentpdf 7.08 MB	7.08
Appendix H MERC Environmental Risk Assessmentpdf 958.03 KB	0.96
Appendix I Air Quality Assessmentpdf 9.56 MB	9.56
Appendix J Greenhouse Gas Assessmentpdf 2.29 MB	2.29
Appendix K Climate Change Assessmentpdf 3.25 MB	3.25
Appendix L Noise and Vibration Technical Reportpdf 7.35 MB	7.35
Appendix M Human Health Risk Assessmentpdf 13.15 MB	13.15
Appendix N Hydrology and Flooding Technical Reportpdf 4.59 MB	4.59
Appendix O Soil Contamination Baseline Groundwater Investigationpdf 19.21 MB	19.21
Appendix P Waste Management Technical Reportpdf 1.74 MB	1.74
Appendix Q Waste Flow Analysis Redactedpdf 1.45 MB	1.45
Appendix R Bushfire Risk Assessmentpdf 7.11 MB	7.11
Appendix S Waterway Assessmentpdf 2.09 MB	2.09
	123.25

Here, as an example, are listed the 19 complex documents amounting to 123 MB that form part of the Wollert Incinerator proposal¹³.

The bias towards the proponent continued during the process. Even at the 'Conference of Interested Persons' on 20 June 2024, organised by the EPA under s236 of the Environmental Protection Act (2017), and facilitated by Mosaic Lab – Cleanaway, directly and through their many varied consultants, were given many tables in the foyer to again try to gain 'social license' – but no community or health group were permitted to have a table to advise or help community members gain an objective understanding. Neither were we or nor any other community group were permitted to present at the conference, despite the proponent given time to present, but to participate with all other members of the public. We were then left to have a table outside in the dark and then protest outside the room

We also noted that Capire Consulting Group, who had previously worked for the EPA preparing a independent report for the Lara WtE incinerator Conference is employed by Cleanaway to conduct PR on the Wollert proposal

Figure 13 Community members outside the 'Conference of Interested Persons' June 2024 organised by the EPA - While the proponent had many displays inside we were not permitted to present or have any information inside the room.. See our little card table on the bottom right



¹³ <https://engage.vic.gov.au/cleanaway-operations-pty-ltd-app024914>



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- iii) **The community showed that Cleanaway does not have a social licence to develop the 380,000 tonne pa WtE Incinerator in Wollert. This was demonstrated to the EPA by the responses to the Wollert EPA process as well as in the independent report for the EPA by Mosaic lab. This was not acted on by the EPA.**

Virtually all of the 764 responses to the EPA enquiry were objecting to the proposal. This was followed by the independent report by Mosaic Lab.

Through the first round of EPA submissions, we were informed that if it was shown that there was no social licence for the project it could not proceed.

The community then demonstrated that there is no social license – but as has been previously stated – we were just put on hold and no decision was made by the EPA.



Figure 14 Front cover & extract of the Mosaic Lab Report - showing that there was no social licence for the WtE Incinerator . ‘The community is distrustful that EPA will listen to the community concerns and will take these concerns into consideration when deciding about the permitting of the proposed waste-to-energy facility.’

Questions to be answered

The following questions were shared by participants at the two Conference of Interested Persons sessions and have been themed under similar areas of interest. It has also been identified, who needs to be responding to these questions.

EPA to seek answers and respond

Where these questions can be answered now (outside of the assessment process) it is expected that it will happen shortly after the release of this report, ideally within 4 weeks.

Community engagement and communications

- What is the EPA engagement process and timeframes going forward?
- How will EPA consider accessible and inclusive engagement i.e., information in multiple languages, use of larger venues with good access and parking?
- What does the reporting process back to the community look like so they can see how their feedback has been utilised?
- How much weight does community feedback have in the decision-making process?
- Where will the input from the community be shared?
- How has the EPA ensured their commitment to accountability concerning this proposal?
- Will there be transparency in the monitoring of emissions and the communication of findings?
- How can EPA support more meaningful engagement with better and accessible information?

Working with Traditional Owners and other stakeholders

- What is the Department of Transport and Planning doing as part of the consultation process and how does it fit with EPA's process? Is there still an opportunity for the community to engage in the planning decision?
- With the council in administration, how is (or will) EPA engage with the Whittlesea Council?
- What arrangements are in place with VicRoads for the transport of highly toxic ash wastes to their final destinations? Will VicRoads permit such transportation?
- What other organisations have been engaged in this process?
- Were state MPs invited to the meeting? If not, can another meeting be arranged?
- Has the Wollert Fire Brigade been consulted, and can these volunteers manage the potential scale of harm?

EPA integrity and authorisation

- What does EPA use as a criterion to base its assessment on?
- Who makes the final decision if there is a conflict between community sentiment and EPA approval?

The questions are still outstanding.

We had, and still have, pages and pages of questions/concerns that was reflected in the report both on process and on the actual proposal. Answers to these questions were not communicated to folk who had participated in the process.

The lack of response has added to the lack of social licence of the project.

Figure 15 The initial Questions from the Mosaic Lab Conference of Interested Persons Report



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- iv) **While the community showed that Cleanaway does not have a social licence to develop the 380,000 tonne pa WtE incinerator in Wollert, Cleanaway have stated that they intend to reapply to the EPA for a licence on the same site for an incinerator with twice the annual tonnage.**

Although the consultants might be delighted by the extra work, we as community members are very disappointed by the EPA. We have not been given any indication of what might happen next and the consideration of the work and the questions left open on the previous consultation.



Figure 16 No Northern Incinerator Wollert folk outside our first public meeting April 2024

- v) **We do not trust the EPA to safely monitor such a large and dangerous plant as the planned WtE incinerator in Wollert**
- Due to experience with the EPA in northern Melbourne,

One example is the much smaller EPA- licensed facilities in the North of Melbourne have been subject to catastrophic, polluting and life-threatening chemical fires¹⁴
 - Because of our own experience of the EPA in the current process with a complete lack of consistency, clarity and transparency
 - Due to the experience of WtE incinerators severely polluting and breaching regulations in overseas operating incinerators

¹⁴ <https://www.theage.com.au/national/victoria/the-intensity-is-enormous-175-firefighters-battle-huge-toxic-inferno-in-melbourne-s-north-20190405-p51b1k.html>



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A recent example of this was the Croydon plant in the UK where there were 916 breaches of environmental standards over 2 years.¹⁵

- d. The Environmental and Occupational Health and safety record for Cleanaway is shocking. The 9 workplace deaths since 2022 are the top of the iceberg when it comes to safety. This does not give the public any confidence of safety for staff or the environment

Cleanaway's dismal record of both safety and environment harms^{16 17} are so widely known that their own shareholders protested at the 2025 AGM

In a recent shareholder briefing¹⁸ the company showed that it has received 92 Environmental notices in the last 2.5 years. It also noted that its Total Recordable Injury Frequency Rate was up to a frightening 4%.



Cleanaway FY24-Half-Year-Results-Media-Release-and-Presentation



Figure 17 Students supporting our opposition to Cleanaway's proposed WtE Incinerator

¹⁵ Incinerator broke air pollution limits 916 times 28 August 2025 <https://www.bbc.com/news/articles/c627evk7yrzo>

¹⁶ <https://en.wikipedia.org/wiki/Cleanaway> Incidents

¹⁷ Australian Financial Review <https://www.afr.com/chanticleer/cleanaway-s-safety-record-costs-the-boss-but-was-it-enough-20250903-p5ms3v>

¹⁸ <https://cleanaway2stor.blob.core.windows.net/cleanaway2-blob-container/2024/02/FY24-Half-Year-Results-Media-Release-and-Presentation-2681782.pdf>



Planning Permit DTP

- i) **There is confusion and lack of transparency over the current status and overall process of the Cleanaway planning permit..**

While the Engage Victoria site, where people were sent for information on the Cleanaway proposal, indicates in the Participate section that the consultancy is closed, we can see on detailed planning information and on the department website that the Ministerial Planning permit is not closed ¹⁹ At the same time we understand, from an email, that the planning process, for the application of a 380,000 tonnes pa incinerator plant has been 'paused'. There is no information of what this status might mean.

It was also noted that for many months the Engage Victoria website listed an old, not working email address to access information regarding the planning process,

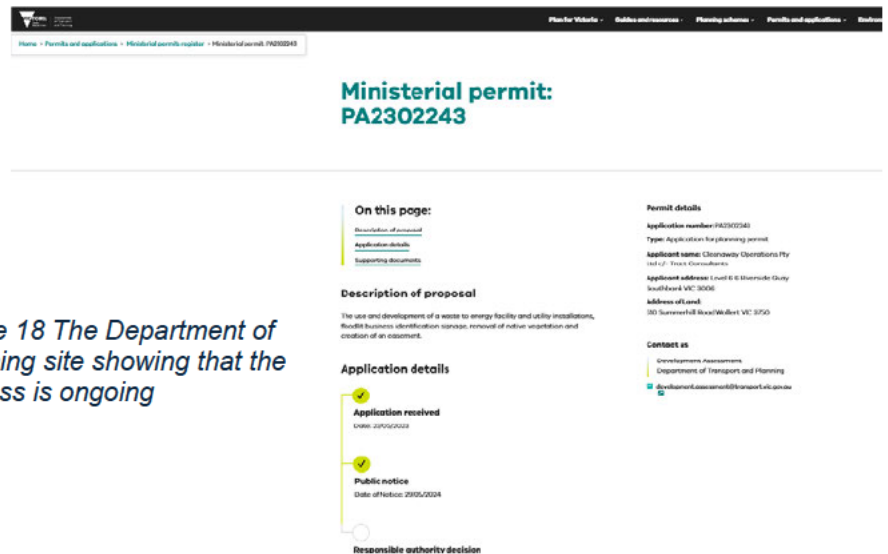


Figure 18 The Department of Planning site showing that the process is ongoing

In addition to these issues there appears to be no publication of the survey data or the objections/submissions or even the number and source of submissions on the proposal. There is no indication of whether this may happen. Even the EPA published the objections to the proposal. This situation adds to the uncertainty and doubts about the process.

So in sum, there is absolute confusion around the status of the planning process and the objections to it. Whether this is the intent or not it takes away from public and our confidence in the process which in fact, deeply affects us in our day to day lives.



Figure 19 A poster painted at our community day in Epping

¹⁹ <https://www.planning.vic.gov.au/planning-approvals/ministerial-permits-register/ministerial-permits/11ba0f26-67f8-ed11-8f6e-002248933fc5>



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- ii) **This residential areas of young families, planned 15 years ago, is a dreadful and dangerous place to build a WtE incinerator.**

Basically, we are horrified that there is a plan to build this toxic incinerator in the middle of the Government planned Northern Growth Corridor ²⁰ with tens of thousands of people planned to live within 6 km of the site by 2030.

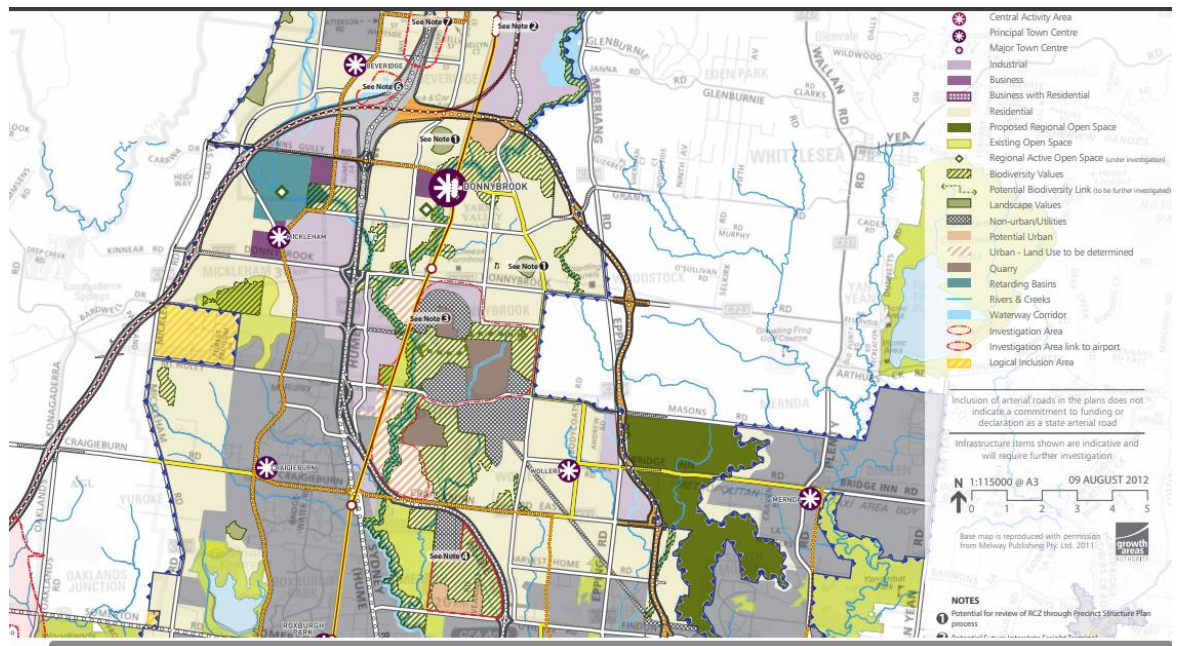


Figure 20 An extract of the North Growth Corridor Plan 2011

While this was a plan and development is still being undertaken, people in their tens of thousands now live in Wollert, Donnybrook and Craigieburn

- iii) **The closest primary school is now just 2.8 km away from the proposed incinerator site with so many more schools and child care facilities planned within 5 km of the proposal.**

There is no indication that the health of these children will be taken into account in the planning process



Figure 21 The Barrawang Primary School (opened January '23 - Just 2.8 km from the planned incinerator site)

²⁰ Northern Growth Corridor Plan 2011 <https://vpa-web.s3.ap-southeast-2.amazonaws.com/wp-content/uploads/2012/11/North-Growth-Corridor-Plan.pdf>



- iv) **There are 20 complex documents, totalling over 100 MB of data making up the planning application. These were produced over a period, most around 2023 by a variety of consultants most around 2023.**

- PA2302243- Air Quality Assessment 16.09 MB
- PA2302243-Transport Impact Assessment-UPDATED 14.52 MB
- PA2302243- Greenhouse Gas Assessment 3.72 MB
- PA2302243- Growling Grass Frog Assessment 10.84 MB
- PA2302243- Human Health Risk Assessment 6.73 MB
- PA2302243- Kangaroo MP 16.15 MB
- PA2302243- Matted Flax Assessment 8.07 MB
- PA2302243- Noise & Vibration Report 7.29 MB
- PA2302243- Planning Report 14.42 MB
- PA2302243- Socioeconomic Report 6.98 MB
- PA2302243- Waste & Resource Management Report 3.49 MB
- PA2302243-Architecture & Landscape Design Strategy 18.52 MB
- PA2302243-Bushfire Risk Assessment 12.44 MB
- PA2302243-Hazardous Substances & Industrial Risk 3.18 MB
- PA2302243-Landscape Character & Visual Impact Assessment 16.35 MB
- PA2302243-Sustainability Management Plan 6.4 MB
- PA2302243-Targeted Golden Sun Moth Assessment 8.13 MB
- PA2302243- Soil Contamination & Groundwater Report 7.28 MB
- PA2302243- Hydrology and Flood Risk Assessment 9.78 MB
- PA2302243- Transport Impact Assessment SUPERSEDED 6.6 MB



Figure 22 A picture from a community tour of the area

- v) **We are horrified to see that in the Planning application documents, Cleanaway used outdated 2016 census data as the basis of their conclusions in their socioeconomic study.**

It alarms us that the same department that has planned the Northern Growth Corridor, that has now come to pass, is considering a permit for a huge toxic incinerator – with an at least 60 meter smokestack producing a plume 24 hours a day 7 days a week.



Figure 23 Current farmland buffer between housing estates (photo taken with drone). It is the proposed WtE Incinerator site 510 Summerhil Rd Wollert. With 600 truck movements a day and 60 meter smoke stack with 247 tonnes



Operational Licence

We do not have any experience of the Operational Licence application.

The prospect, after our experiences in the planning and EPA processes, adds to our conviction that it these incinerators need to be stopped before communities are subject to working on these processes.

(2) the impact of WtE, including from –

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

Separating organic materials from waste streams, improves the quality and value of all waste streams is what is important. This was explained well by The Australia Institute in its submission to the NSW WtE inquiry²¹.

Burning away plastic and other carbon-containing waste converts it to dangerous carbon dioxide, which will exacerbate the climate crisis. Increasing carbon dioxide is a climate bomb rather than “gases that naturally exist in our air”, as stated by the proponent’s website

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

We have been given no information of how bottom or fly ash could be treated, transported and or buried as part of the application processes on the proposed Wollert incinerator. This is an alarming omission from the information provided and yet another reason why these incinerators should not be built in Victoria.

We do know that on 20 June 2025, Heidelberg Materials Australia Resource Recovery Pty Ltd of Wollert advised EPA of its decision to withdraw a development licence application for dealing with hazardous ash²². We have no idea of whether a new different development licence will be applied for at the Wollert site.

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

The broader cost to the community of the harms caused by the operation of WtE incinerators has not been published. In health terms alone they would be substantial and long term.

The cost to local businesses and local agriculture we image would also be significant.

²¹ <https://australiainstitute.org.au/report/submission-to-nsw-select-committee-on-proposed-energy-from-waste-facilities/>

²² https://engage.vic.gov.au/heidelberg-materials-australia-resource-recovery-pty-ltd-app037261?fbclid=IwY2xjawQ66ulleHRuA2FlbQlxMQBicmlkETEzZVhFNnM4OFdrQ2NoTTFic3J0YwZhcHBfaWQQMjlyMDM5MTc4ODlwMDg5MgABHmFCcgYkhj3ZEUlWlHvdv3DKKeCZ7C2NABQM-Zh0_z483HJ8aed4YS5YjHzeS_aem_uaNq4cd0k1ooyubxE9GuMA



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The most important guiding principle in the preparation of new waste management regulations, and project approvals, must be the “Precautionary Principle”;

“The precautionary principle is a strategy used to prevent harm to the public or the environment when scientific knowledge is incomplete. It suggests taking preventive action in the face of uncertainty, rather than waiting for conclusive evidence of harm.”

The sincere application of the Precautionary Principle would eliminate waste incineration (in all its forms) from consideration.

Wollert has a huge landfill that takes a large proportion of Melbourne’s waste. It is estimated to be 69 million tonnes in capacity and estimated to last between 70 and 100 years²³.

(4) the adequacy of community consultation; and

First the precautionary principal and public health concerns should take precedence before community consultation

Given Community consultation – This was/is conducted poorly for the Wollert incinerator proposal, other than the documentation of the EPA conference of interested persons.

Second – in this rapidly growing area many people impacted do not yet live in the area – so consideration needs to be made of those who are not yet in the area.

Third The EPA outreach was initially appalling. Of those who came to the initial meetings we found only two people who found out through the EPA. The remainder found out through our social media outreach (except for one fellow who found out by googling his own address)

Forth The initial EPA meetings were only successful in being a means of us gathering together. The initial meeting comprised of someone describing verbally, with jargon, the EPA process without any reference to any absolutes.



Figure 24 Opposing the Incinerator proposal was voted a top priority by the Residents of Epping North and Wollert at the 2025 AGM.

Fifth No account was initially taken to accommodate language diversity for our multicultural community

Sixth Engage Victoria Information was confusing and selective – those engaged were not kept informed of the process (see previous comments)

All of this made the EPA process look good when compared with Planning Permit Process. Basically, there was an information session in March 2024 (combined with the EPA). Even the email address was not changed on the Engage Victoria site when the department changed names.

²³ <https://www.heidelbergmaterials.com.au/en/sustainability/wollert-resource-park/waste-and-resources>



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(5) any other related matters

When young families are looking to buy a home they are not told that there are plans for an giant WtE incinerator on that nice farmland nearby.

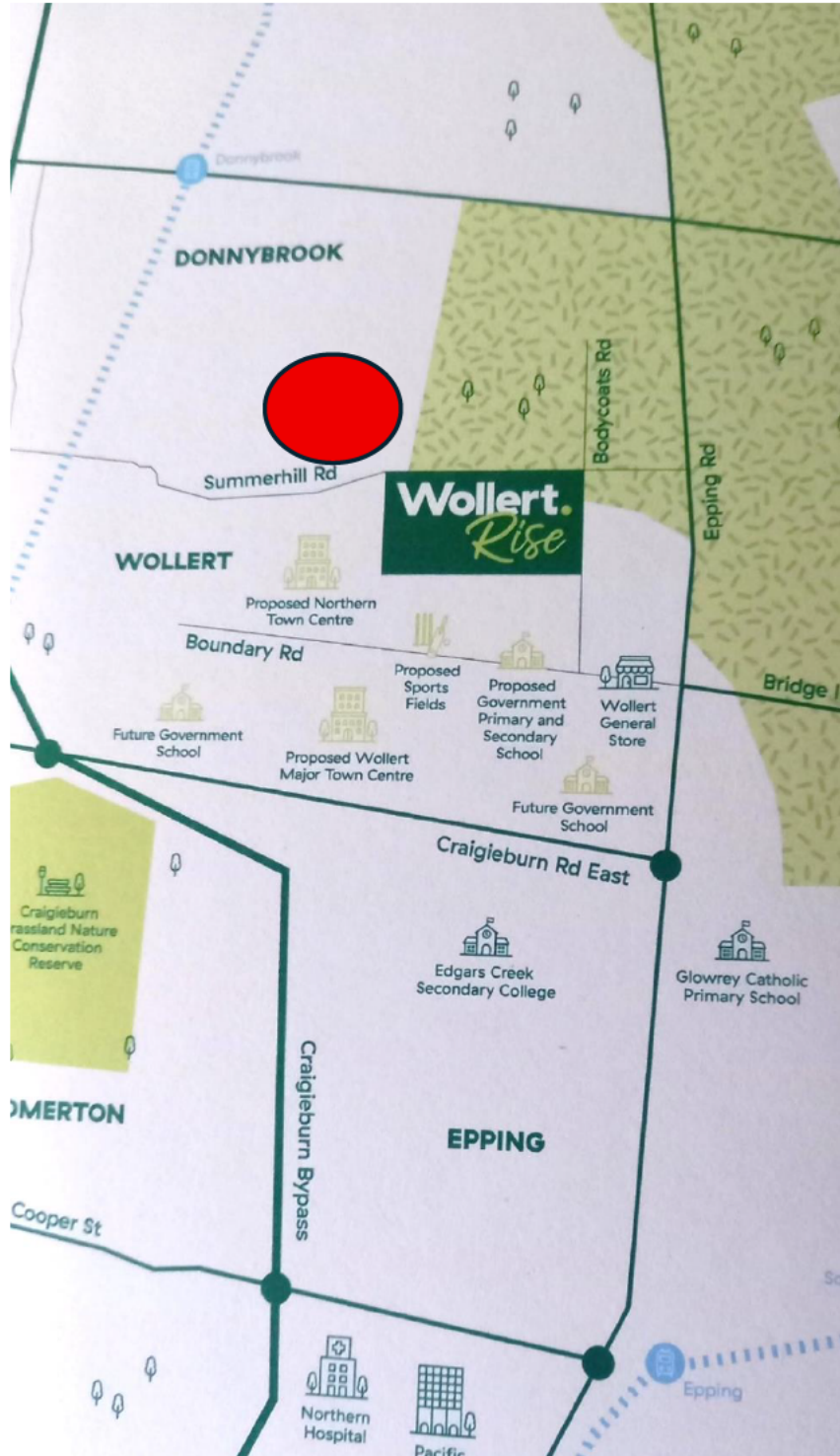


Figure 25 Wollert Rise Brochure . We have added in the approximate location of the proposed incinerator in red





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We and our children live, study and work in the areas around the proposed Wollert Incinerator. We are hugely concerned for the safety of our children and the vulnerable due to the increasing evidence of harms of toxicity produced by this type of incinerator.

So far thousands of us have signed petitions, completed submissions, held up signs, delivered fliers, lobbied councillors and staff and have even gone to parliament. The health of our future and our children's future should not be up to us continuing this process repeatedly, especially while the state government is actively supporting industry to undertake this toxic plan.

So many folks have bought their forever land and homes in this area and look to be indebted for decades – lured by the idea of clean air and farmland nearby so suitable for young children. And there are so many folks in the process of purchasing now or in the future without any idea that the farmland that is near their property might turn to producing toxic waste 24/7 for the next 25 years.

This submission has given just a glimpse of what the community has dealt with so far in trying to protect Melbourne's north from toxic incinerators – We are following in the steps of folks from Craigieburn before us.

The only way we will be able to have Environment Protection for our community is if our government, rather than acting in support of industry, legislate and resources making a healthy environment. To recommend that these incinerators not be built in metropolitan areas would be a good first step in that process.



Figure 26 Wollert Rise Brochure

Parts of Wollert Rise are just 3km from the proposed incinerator site (currently farm land)



Additional References

1. Cancer Australia (2023) “Australian Cancer Plan”, particularly “Strategic Objective 1 Maximising Cancer Prevention and Early Detection”.
Summary report available at
https://www.canceraustralia.gov.au/sites/default/files/publications/pdf/2023_ACP%20Summary%20Report%20DIGITAL_V9.pdf
2. DEECA (2021) “Waste to Energy Framework”. Department of Energy, Environment & Climate Action.
Available at <https://www.vic.gov.au/waste-energy>
3. DEECA (2025) “Climate Action Targets”. Department of Energy, Environment & Climate Action.
Available at <https://www.climatechange.vic.gov.au/climate-action-targets>
4. DT&F (2024) “Economic Growth Statement”. Department of Treasury and Finance.
Available at <https://www.vic.gov.au/economic-growth-statement>
5. DT&P (2023) “Ministerial Guidelines for the Assessment of Environmental Effects” 8th Edition 2023. Department of Transport and Planning Victoria.
Available at <https://www.planning.vic.gov.au/environmental-assessments/environmental-assessment-guides/ministerial-guidelines-for-assessment-of-environmental-effects>
6. EPA Engage Victoria (2025) “Striking the right balance for waste to energy in Victoria”.
Available at
https://engage.vic.gov.au/wastetoenergy?fbclid=IwY2xjawJavAdleHRuA2FibQIxMQABHRMuAxHPELN0MRD7J75Zdc6eqMTKesY81JCIH9TP3uxrhRC8LGoLPzwxMQ_aem_oj6ZM8RSIXb7IBheQZxBng
7. Euronews (2023) “Millions in France warned not to eat eggs from backyard chickens due to forever chemical pollution.”
Available at <https://www.euronews.com/green/2023/11/21/millions-in-france-warned-not-to-eat-eggs-from-backyard-chickens-due-to-forever-chemical-p>
8. GAIA (2013) “Waste Incinerators: Bad News for Recycling and Waste Reduction”
Available at <https://www.no-burn.org/wp-content/uploads/Bad-News-for-Recycling-Final.pdf>
9. Jelinek at alia (2022) Dioxins – “The old dirty (dozen) guys are still with us – II”
Available at https://www.researchgate.net/publication/361094192_Dioxins_-_The_old_dirty_dozen_guys_are_still_with_us_-_II
10. Jelínek Nikola, Petrлік Jindřich, Bremmer Jane, Kuepouo Gilbert, Ochieng Griffins, Ožanová Sarah, Bell Lee (2024) “Waste incineration and the environment”, Toxics Free Australia. Available at https://www.toxicsfreeaustralia.org.au/wp-content/uploads/2024/09/Jelinek_2024_Waste-Incineration.pdf
11. Maxey, Ahmina (2025) “What’s wrong with burning trash anyway ? So very very much.” Conservation Law Foundation, Boston Massachusetts USA.
Available at <https://www.clf.org/blog/whats-wrong-with-burning-our-trash-anyway/>
12. Orellana, M.A. (2023) Statement within “Australia: Deep divide between Government and community narratives on toxics fuels anger and distrust, says UN expert.” *UN Office of the High Commissioner for Human Rights*



No Northern Incinerator Wollert Inc

- Available at <https://www.ohchr.org/en/press-releases/2023/09/australia-deep-divide-between-government-and-community-narratives-toxics>
13. Parliament of Victoria (2020) "Inquiry into recycling and waste management" Legislative Council Environment and Planning Committee
Available at <https://www.parliament.vic.gov.au/get-involved/inquiries/inquiry-into-recycling-and-waste-management/reports>
 14. PHAA (2024) "Waste Incineration Policy Position Statement." Public Health Association of Australia, Canberra A.C.T., September 2024.
Available at <https://www.phaa.net.au/common/Uploaded%20files/SIG%20documents/Ecology%20and%20Environment%20SIG/PPS%202024/0520 - EE - Waste Incineration - 2024.pdf>
 15. Rollinson A.N. (2018) "Fire, explosion and chemical toxicity hazards of gasification energy from waste." *Journal of Loss Prevention in the Process Industries*, Volume 54, July 2018, Pages 273-280. Elsevier (Publ.)
Available at <https://www.sciencedirect.com/science/article/abs/pii/S0950423018301323>
 16. Stallard et alia (2024) "Burning rubbish now UK's dirtiest form of power" by Esme Stallard, Matt McGrath, Patrick Clahane & Paul Lynch. BBC News.
Available at <https://www.bbc.com/news/articles/cp3wxqje5pwo>
 17. Stockholm Convention on Persistent Organic Pollutants (POPs) (2019). See in particular Annex C Part II(a)
Available at <https://chm.pops.int/Portals/0/download.aspx?e=UNEP-POPS-COP-CONVTEXT-2025.English.pdf>
 18. Tait P.W. et alia (2020) "The health impacts of waste incineration: a systematic review", reported in *Aust NZ J Public Health*. 2020; 44:40-8; doi: 10.1111/1753-6405.12939.
Available at <https://onlinelibrary.wiley.com/doi/full/10.1111/1753-6405.12939>
 19. Tishman (2019) "U.S. Municipal Solid Waste Incinerators: An Industry in Decline."
Available at https://www.cleanairactionnetwork.org/files/ugd/95c1d5_673206dcda994e578a3f9f5b862b4bf2.pdf
 20. ToxicoWatch (2025) "Biomonitoring projects: Netherlands, Basque Country Spain, Belgium, France, Slovakia, Spain, Czech Republic, Lithuania" ToxicoWatch
Available at <https://toxicowatch.org/biomonitoring-projects/#1622>
 21. Vahk J. & Arkenbout A. (2025) "New data links waste incinerators to toxic contamination in surrounding environments – Spain, France, Netherlands." ToxicoWatch 1 April 2025.
Available at https://zerowasteurope.eu/press-release/new-data-links-waste-incinerators-to-toxic-contamination-in-surrounding-environments-spain-france-netherlands/?fbclid=IwY2xjawKet2BleHRuA2FibQIxMABicmlkETF3eUQ0SXN0Zk5KcjN5RVpiAR6a_WSL8X4ID3XJd8lml0ZEKxozzpIRT1MqIWIPfqiS53bQNSs_D3YI83UJT_Q_aem_-NYZt4BX7QvWTMaSNbeTlw
 22. Victorian Legislation (2017) "Environment Protection Act 2017"
Available at <https://www.legislation.vic.gov.au/in-force/acts/environment-protection-act-2017/017>
 23. Victorian Legislation (2023) "Circular Economy (Waste Reduction and Recycling) (Waste to Energy Scheme) Regulations 2023"



No Northern Incinerator Wollert Inc

- Available at <https://www.legislation.vic.gov.au/in-force/statutory-rules/circular-economy-waste-reduction-and-recycling-waste-energy-scheme/002>
24. ZWE (2021) “The EU is clear: Waste-To-Energy incineration has no place in the sustainability agenda.” written by Kassandra Makavou for Zero Waste Europe.
Available at <https://zerowasteurope.eu/2021/05/wte-incineration-no-place-sustainability-agenda/>
25. ZWE (2025) “Call for a moratorium on new waste incineration in the EU” A letter to the President of the European Commission from Zero Waste Europe
Available at <https://zerowasteurope.eu/wp-content/uploads/2025/09/ZWE-Sep25-joint-letter-moratorium-on-new-waste-incineration-1.pdf>
26. ZWE (2025) “New data links waste incinerators to toxic contamination in surrounding environments – Spain, France, Netherlands” Zero Waste Europe.
Available at https://zerowasteurope.eu/press-release/new-data-links-waste-incinerators-to-toxic-contamination-in-surrounding-environments-spain-france-netherlands/?fbclid=IwY2xjawJZT-RleHRuA2FibQlxMAABHeLUPqqftzkJp-tXKe-Krd-oCn2EBqetD003YKXGx3dPgEaZkjeuFBF2IA_aem_5NtKUG2L9Aa_AEY_c4xJSQ#:~:text=Brussels%2C%201%20April%202025%20-%20A,%2C%20France%2C%20and%20The%20Netherlands