



FRIENDS OF MERRI CREEK



On behalf of its more than 750 members and over 17,000 social media supporters, the Friends of Merri Creek (FoMC) opposes the approach being taken by the Victorian Government to waste management of domestic and industrial waste through use of waste incineration (Waste to Energy–WtE).

We note that the Inquiry being held by the Legislative Council's Economy and Infrastructure Committee is investigating a number of aspects of WtE including:

- The suitability of existing plans and policies
- The impact of WtE
- Alternatives to WtE
- The adequacy of consultation held so far and
- Any other related issues

Why Friends of Merri Creek is opposed to Waste to Energy (Incinerator) policy and projects.

As FoMC noted in its submission on the development application by Cleanaway for establishing a waste incinerator in Wollert, plastic waste is one of the most significant threats to improving the habitats and visual appeal of waterways such as Merri Creek, affecting both human use of the country through which waterways close to WtE facilities flow and the health of the ecosystems of country and the waterway in proximity to WtE facilities. The proposals to obtain approval for and establish WtE facilities in Victoria do nothing to drastically reduce the use of plastics, (which should be Victoria's goal) and perpetuate the use of fossil fuels to make more plastic while passing the costs of inaction and destruction of existing plastics onto the community.

FoMC is also aware that WtE facilities are banned in many jurisdictions as they are inconsistent with best practice and protection of human health and the environment. They are not permitted to be established in suburban areas such as metropolitan Sydney and Canberra. No case has been made by either the proponents or the government for parts of Melbourne such as South Dandenong, Lara, Sunbury and Wollert or the pulp and paper mill at Maryvale, to be exceptions to bans such as those imposed in Canberra and suburban Sydney.

Reduce, Reuse and Recycle before recovering energy.

To best meet community expectations and the waste hierarchy, the Victorian government should focus on:

- (i) reducing the use of materials that are at present more difficult to repurpose,
- (ii) supporting material reuse options, and
- (iii) encouraging and supporting recycling of waste types that are currently more difficult to reuse,

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- (iv) requiring product stewardship by producers, which is an important part of the circular economy. The WtE model avoids any producer responsibility for the waste their products generate.

before opting for the simplistic “solution” to waste management that burning of waste appears to offer. The above approach would better protect the health of waterways such as Merri Creek and the catchments through which these waterways flow.

Experience in countries with similar waste management systems to Victoria (e.g. United Kingdom) indicate that recycling rates go down as the amount of waste burnt in incinerators rise. That result would be diametrically opposed to the primary waste management goal of the Victorian government and would be a terrible indictment of a government which claims to be environmentally responsible. It would also mean a growing risk to catchments with there being increasing amounts of waste being transported and “managed” on Merri Merri country and other catchments in Victoria.

Contamination of air, land, and waterways

Experience with WtE projects is that fallout from air emissions contaminates land around them, in some cases causing bans on human consumption of food grown on that land. For example, dioxins, which are considered to be among the most toxic byproducts of incineration, are known to have contaminated hundreds of hectares of land around a number of WtE incinerators. This would result in contamination of waterways near WtE incinerators. FoMC fears that the proposed Wollert WtE incinerator would pose the same threat to Merri Creek, undoing 50 years of restoration work that FoMC and MCMC have completed on Merri Merri country (the Merri Creek catchment) with community and Council support.

Burning rubbish increases greenhouse gas emissions rather than reducing them, which the Victorian government is actively attempting to do through its decarbonisation initiatives. It would clearly be counterproductive to the decarbonisation goals.

Failure of consultation

Our involvement in the consultation process adopted by the government and lead by Cleanaway for the proposed Wollert WtE incinerator has left us with no confidence that a fair and proper approach has been taken. Based on what we have heard from other communities involved with WtE incinerator proposals, “window dressing” would be a good description of their (and our) experience. The proponents and government agencies appear to be just going through the process, with a pre-determined outcome in mind.

FoMC was particularly disappointed that EPA staff at the Wollert conference of interested persons (20 June 2024) firstly, did not or were not able to contribute to the conference and secondly, expressed support for the proposal when consulted on a person-to-person basis. Such a biased approach from a supposedly independent regulator reinforced FoMC’s lack of confidence in the government approval process. That lack of confidence is consistent with what we have heard from other communities involved with WtE incinerator proposals.

Making waste management worse

WtE incinerators do not greatly reduce the volume of waste that needs to be disposed of, and they worsen the situation by creating relatively high volumes of more toxic, dangerous and difficult to manage waste types which still need to be safely disposed of. FoMC does not want a high-level toxic

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waste landfill on Merri Merri country or anywhere else in Victoria as they pose a long-term threat to land, groundwater and surface water.

In conclusion

FoMC opposes the approval of waste incinerators on Merri Merri country and elsewhere in Victoria as they would inevitably:

- contaminate air, land, and water,
- delay, halt or reverse Victoria's ability to reduce, reuse or recycle waste materials,
- generate more greenhouse gas emissions, worsening climate change (heating).

FoMC also stands with the community that lives on Merri Merri country which has expressed a strong desire for a clean, healthy environment in which to live and bring up future generations.

Should the government ignore the widespread community opposition to the establishment of WtE incinerators and approve any of the proposals, then the VCAT requirements for the Laverton WtE incinerator should be applied i.e. any approved WtE incinerator should:

- *Only accept waste which would otherwise be disposed of to landfill.*
- *Provide full transparency to the public on air pollution by publishing continuous emissions monitoring data in real time and periodic monitoring data on an approved project website.*
- *Monitor an increased range of pollutants, including condensable particulate matter.*
- *Meet the lower end of the European emission limits.*
- *Conduct continuous emissions monitoring of volatile organic carbon.*
- *Ensure the pollution control equipment can be upgraded if required to reduce emissions of toxic furans and dioxins to the maximum extent achievable.*
- *Ensure that the facility is designed to be able to accommodate future material recovery including steel, e-waste, recyclables, and other hazardous materials.*
- *Restricting the amount of waste products from the project that can be disposed of to landfill to 3% of feedstock by weight.*
- *A requirement for 'waste arising' contracts to be preferred, to avoid locking councils into contractual obligations to supply fixed amounts of waste and disincentivise recycling. (These are a new type of waste contract for councils in Victoria, which means that ratepayers don't pay disposal fees for waste they don't create. This ensures that waste that ought to be recycled, can be recycled.)*

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For and on behalf of Friends of Merri Creek

Note: Nothing in this submission is confidential and this submission is not copyright.