HiQ Victoria:
Bulla VIC 3428

Victorian Parliamentary Inquiry into Waste-to-Energy: HiQ submission

2 April 2026

The Legislative Council Economy and Infrastructure Committee Inquiry into the development and expansion of waste-to-energy (WtE) infrastructure in Victoria

Dear Chair

On behalf of HiQ, thank you for the opportunity to contribute to Victoria's inquiry into the development and expansion of waste-to-energy (WtE) infrastructure in Victoria.

Waste management impacts every household and every individual in Victoria and, for that reason, HiQ welcomes the examination of the sector's design, frameworks and future.

Over many years, the Victorian Government has carefully designed and developed legislation and frameworks that recognise the important role WtE plays in the waste hierarchy. These include the *Environment Protection* Act 2017, the *Circular Economy (Waste Reduction and Recycling)* Act 2021, the Victorian waste to energy framework 2021 and the Victorian Recycling Infrastructure Plan (VRIP) 2024.

As you will see in our submission, we believe that, when developed responsibly and managed effectively, the benefits of WtE are clear:

WtE addresses the growing waste challenge, while delivering a dual benefit of energy generation.

Accelerating Australia's circular economy, scaling waste infrastructure and advancing resource recovery has been HiQ's primary focus for many years. Our existing Sunbury precinct is one of Victoria's largest waste management and resource recovery facilities, and for over two decades, we have provided essential services in response to some of the state's most complex challenges.

Our contributions have included:

- the design, construction and operation of major infrastructure to safely process large volumes of materials from Victoria's Big Build
- providing emergency waste services during natural disasters, such as floods and bush fires
- being the first business in Australia to introduce RAT testing for all employees before their shift
- supporting major clean-up efforts to protect Victorian communities, and
- providing ongoing services to accept municipal and construction waste from some of the state's largest businesses, Local Government Areas (LGAs) and the surrounding community.

Since our entrance into the Sunbury community in 2001, we have evolved and expanded our services to embrace emerging technologies, meet rising expectations and deliver consistent services for governments, business and industry.

We believe that addressing the systemic challenges in the waste sector cannot be viewed in isolation and we direct our efforts to establishing the most appropriate solutions across the waste hierarchy. Our integrated circular economy precinct in Sunbury provides solutions spanning resource recovery, recycling, organics composting, waste treatment and safe disposal.

Operating a facility such as ours comes with great complexity. It is a responsibility we do not take lightly, but we also know the benefits its evolution and contributions will bring to Victoria.

The creation of local skilled jobs, the development of industry, significant capital investment, the reduction in greenhouse gas emissions, the diversion of waste from landfill and the generation of energy will benefit the local area and the wider state for years to come.

HiQ encourages the opportunity to discuss this submission and our proposed WtE facility in more detail with the Committee through this Inquiry process.

We look forward to discussing this with you at your convenience.

Yours sincerely

Mark Rodgers
Chief Executive Officer
HiQ Group

Executive Summary

residual waste needs beyond 2080.

As HiQ considers the future impacts technology will have on the Victorian approach to waste management, it is of the firm belief that WtE plays a fundamental role. WtE complements whole-of-hierarchy waste solutions addressing rising residual waste challenges, while supporting broader investment in higher order solutions, including avoidance, recovery and reuse.

In that context, HiQ's submission, outlined within, provides an overarching view of Victoria's waste challenges and sets out the pathway ahead. It also addresses each of the Committee's Terms of Reference sharing a clear perspective on each element of Victoria's WtE landscape.

HiQ's responses to the Terms of Reference are summarised below.

Term of Reference	HiQ Position
1. Suitability of existing WtE plans and policies • HiQ ***supports*** Victoria's policy and legislation and recognises it as an environment that mirrors international best practice providing transparency for decision-makers and communities. • We ***encourage ongoing refinement*** of these frameworks to ensure Victoria stays in-line with global shifts.	**Endorses + Recommends refinement** ●●○
2. The impact of WtE • HiQ ***endorses*** strict management for all major industry and stringent operating conditions through licencing. • HiQ ***calls for action*** to: (i) embed household level *source separation* to ensure waste is appropriately managed at the point of generation, and (ii) higher clarity and planning around reuse and recovery of *WtE byproduct* to support facility commerciality and circularity.	**Calls for action** ●○○
3. Alternative approaches and emerging technologies • HiQ ***endorses*** integrated precinct models to develop whole-of-hierarchy solutions that ensure WtE only manages residual waste and higher order solutions are prioritised. • HiQ notes this is recognised in Government framework, policy and legislation and is a key feature of the HiQ precinct development.	**Endorses** ●●●
4. Adequacy of community consultation • HiQ ***acknowledges*** the importance of community consultation and note its efforts over many years in engaging with the local community. • HiQ ***calls for action*** to increase government and regulator-led consultation where it helps to achieve core outcomes of building social licence for WtE adoption.	**Endorses + Recommends refinement** ●●○

Overview of Victoria's waste challenges

Ambitious targets have been set to meet global standards

achieve net zero emissions. A fundamental focus of these ambitions, and the broader shift towards a circular economy, is to keep materials in use for as long as possible and reduce overall waste generation.

WtE is an essential element to achieving these goals.

Victoria's 2030 targets span the waste hierarchy:

- decrease waste generation by 15%
- divert waste going to landfill by 80%
- halve the volume of organic material going to landfill, and
- ensure every Victorian household has access to FOGO waste recycling services or local composting[1].

Government policies are clear: we must do more, we must do it urgently and we must do it together.

In 2021, EPA Victoria introduced its new waste hierarchy[2], which prioritises waste management techniques from most preferred to least preferred to best protect human health and the environment.

It rightly prioritises avoidance, reuse and recycling as its core focuses. It's important to acknowledge that progress is being made, with household waste disposal per capita currently declining in Victoria[3]. However, waste modelling indicates that expected population growth will outweigh the improvement in individual consumption and waste behaviours.

As we face these challenges, we do so with an understanding of the practical reality that a portion of waste will remain that is not technically, environmentally or economically practicable to recycle - often referred to as TEEP. This will be the case even with continued improvements in recycling systems and behaviour change.

Government policy and the waste hierarchy recognise that, after valuable recyclable materials have been recovered, energy recovery is preferable to landfill disposal.

Meeting Victoria's waste and resource recovery targets is complex. To ensure all Victorians continue to receive the service and support for their growing waste needs into the future, we must develop a coordinated, holistic approach at every layer of the waste hierarchy.

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[1] Recycling Victoria: A New Economy, Victorian Government, https://www.vic.gov.au/sites/default/files/2020-03/02032020%20Circular%20Economy%20Policy%20-%20Final%20policy%20-%20Word%20Accessible%20version%20.pdf. Accessed March 2026.

[2] EPA Victoria, Principle of waste management hierarchy, https://www.epa.vic.gov.au/node/43647#6-principle-of-waste-management-hierarchy. Accessed March 2026.

[3] Local Government Waste Services Report 2019-2020, Sustainability Victoria, https://assets.sustainability.vic.gov.au/susvic/Report-Waste-Local-Government-Waste-Services-Report-2019-20.pdf. Accessed March 2026.

Residual waste is rising and urgent solutions that reduce reliance on landfilling are required

reused or recycled) is projected to nearly double, reaching 8.9 million tonnes of waste generated every year by 2053[4].

This increase will cause several key challenges. It will create substantial environmental issues, including increased greenhouse gas emissions due to increased waste to landfill over many decades, it will expose Victoria to significant disruption risk to waste management services, and it will use constrained landfill space for waste that could be better utilised. These risks will be passed onto ratepayers and residents across the state.

Without alternative pathways, waste will continue to be disposed of in landfill. This is far from the best option, especially as technology evolves. Landfills are major emitters of methane, one of the most potent greenhouse gases, and, if they are not managed with the appropriate controls, can cause environmental and human risk.

The Victorian Government's *Waste sector emissions reduction pledge 2026-30*[5] showed that the waste sector accounted for 4% (3.3 Mt CO2-e) of Victoria's total emissions in 2023. The decomposition of solid waste in landfills accounted for 72% of waste sector emissions (2.4Mt CO2-e) in 2023, making landfill the largest contributor of waste sector emissions.

At the same time, landfill capacity in Victoria is becoming increasingly constrained, with limited new capacity anticipated or permitted by current government policy in the near term.

Over the next 10-15 years, Victoria's waste system will become increasingly exposed to disruption risk, as landfill airspace is exhausted and development of new landfills face significant barriers. Only four metropolitan landfills have a forecast life beyond 2036, including HiQ Sunbury, Wollert, SBI and Werribee[6].

This poses the risk of lower capacity to receive waste and raises the possibility for bulk haulage of waste to landfills and WtE facilities outside of Melbourne and interstate. This would increase costs to ratepayers and taxpayers and introduce a resilience risk as the world faces ongoing geopolitical instability.

It is also important for landfill airspace to be preserved for waste streams that cannot be handled in any other way. Landfill is currently the only option that processes all residual waste types (excluding Category A and B wastes) and is the only system that can respond to disasters by receiving surge volumes, including in natural disasters, economic disruptions or social disruptions (as seen through the pressures on the waste system during the COVID-19 pandemic).

Combined, these factors reinforce the need for alternative solutions to manage residual waste.

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[4] Victorian Recycling Infrastructure Plan, Victorian Government, https://www.vic.gov.au/sites/default/files/2024-10/RV_Victorian-Recycling-Infrastructure-Plan-2024.pdf. Access March 2026.
[5] Waste sector emissions reduction pledge, Victorian Government, https://www.climatechange.vic.gov.au/__data/assets/pdf_file/0031/771745/waste-sector-pledge-2026-30.pdf, accessed March 2026.
[6] Victorian Recycling Infrastructure Plan, Victorian Government, https://www.vic.gov.au/victorian-recycling-infrastructure-plan, accessed March 2026.

Waste-to-energy plays a critical role

Victoria, and especially Melbourne, has a strong track record of innovation in infrastructure, sustainability and environmental management.

WtE's implementation presents significant benefits for managing the state's residual waste stream, supporting the circular economy by reducing the volume of material sent to landfill while enabling resource recovery in the form of energy and materials such as metals and aggregate.

WtE has been identified by the Victorian Government as one way to continue this trajectory, drawing on internationally proven technology adapted to local conditions to enable better management of residual waste, reducing reliance on landfills and generating much-needed resources for the state.

This is safe, proven technology that has been used in thousands of facilities in major cities and residential areas across Europe, the United Kingdom, the USA and parts of Asia for several decades governed by stringent regulation that guides development of all new facilities.

Modern WtE facilities must address the requirements of the European Union Waste Incineration Directive 2000, which has been continuously enhanced and tightened, including through the Industrial Emissions Directive 2010 and the 2019 Best Available Techniques (BAT) Reference Document (BREF).

Together, these regulations establish the standards of modern WtE facilities and have informed Victoria's sector development.

For Victoria's policies, it means planning and regulatory frameworks can follow best practice, proven standards and ensure a high-level of scrutiny on facilities across the state.

Developers of this technology have the substantial benefit of drawing on extensive international experience, including proven design approaches, operational practices and regulatory frameworks to bring the latest, proven technology to Victoria.

This safe technology, used effectively, enables the creation of value from what would otherwise be disposed of, including electricity, heat, steam, recovery of metals and aggregate materials for construction use. In this capacity, WtE can also contribute to Victoria's energy and net zero objectives and future energy needs by generating a substantial and grid stable, continuous supply of electricity from existing waste residual streams.

As demand for reliable base load electricity grows, driven by factors such as electrification, digital infrastructure and emerging technologies including data centres and artificial intelligence, WtE can form part of a diversified and resilient energy mix.

HiQ's proposed WtE facility will generate electricity and heat that can be used onsite, support future co-located industrial development or be supplied to the grid. This aligns with broader planning for employment and industrial precincts, including the Sunbury Road Employment Area, where reliable energy supply will be important to support future growth. WtE generation typically contains a significant

Victoria's ambitious environmental and economic targets can be achieved in a practical, balanced and system-wide manner.

Investment across the hierarchy complements this technology

As the role of WtE in Victoria is considered, it must be done so alongside broader investments in recycling systems, organics processing and waste reduction initiatives.

WtE plays an important part in this.

Investment in this technology supports a transition away from reliance on landfill while higher-order solutions continue to develop and scale. Importantly, WtE does not displace or stall innovation in recycling and waste reduction. Rather, it complements these efforts by addressing the materials that remain after best efforts have been made to avoid, reuse and recycle.

Victoria's waste to energy framework[8] has been carefully designed to prevent overreliance on WtE and ensure investment and innovation is still directed towards all elements of the hierarchy.

By providing a reliable solution for residual waste, WtE can help stabilise the broader system, enabling continued focus and investment in upstream innovation such as improved sorting technologies, product stewardship schemes and circular economy initiatives.

HiQ's plans reflect that focus, with its proposed facility forming part of a broader integrated circular economy precinct spanning organics composting, resource recovery, recycling, treatment and disposal.

Existing and planned co-located activities at HiQ's Sunbury site reflects an integrated model to support circular economy outcomes, reduce transport requirements and maximise the recovery of valuable materials before residual waste is used for energy generation.

A balanced investment across the hierarchy, supported by complementary infrastructure such as WtE, will be essential for Victoria to manage its waste sustainably, reduce environmental impacts and build a resilient and future-ready resource recovery system.

[7]Municipal Solid Waste as a Renewable Energy Source: Evaluating the Potential for Sustainable Electricity Generation in the Minas Gerais Region in Brazil, *Recycling* 2025, https://doi.org/10.3390/recycling10060205 Accessed 2 April 2026.

[8] Victorian waste to energy framework, Victorian Government, https://www.vic.gov.au/sites/default/files/2022-02/Victorian%20waste%20to%20energy%20framework_0.pdf. Access March 2026.

Addressing the Terms of Reference

1. The suitability of existing WtE infrastructure plans and policies

The Victorian Government introduced its waste-to-energy policy in 2020 with the release of *Recycling Victoria: A New Economy*, a 10-year plan which established WtE as an essential part of our waste system. This position was strengthened in subsequent years, including *Circular Economy (Waste Reduction and Recycling)* Act 2021 (CE Act), *the Victorian waste to energy framework 2021* and the *Victorian Recycling Infrastructure Plan (VRIP) 2024* and is recognised in EPA Victoria's waste hierarchy outlined in the *Environment Protection* Act 2017 (EP Act).

Together, these ensure WtE technology is developed in a balanced and responsible way, that impacts on surrounding communities and environments are effectively managed and that operating conditions meet global standards.

HiQ recognises this legislative and policy environment as one that meets global best practice, while encouraging ongoing refinement to ensure Victoria stays in-line with global shifts and continues to deliver world-leading facilities.

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

Compatibility of WtE with surrounding communities, environment and infrastructure is at the core of planning frameworks and regulatory requirements. Ensuring this compatibility is also essential to HiQ's proposed facility, which places co-location and consultation as priority focuses.

To be considered for a Cap Licence for WtE, HiQ undertook a rigorous application process, which included the development and analysis of several planning, environment and community reports that were assessed by Recycling Victoria. These included a traffic engineering assessment and community engagement strategy to ensure all residents and interested parties had access to transparent, detailed information about the proposed facility. Furthermore, as part of environmental and planning applications, HiQ is required to demonstrate a full suite of potential impacts alongside mitigation techniques and approaches.

In HiQ's site identification and subsequent application information, we are clear that our Sunbury site presents clear benefits for infrastructure and the community.

As a government-recognised Hub of State Significance, HiQ's Sunbury site already receives and processes over one million tonnes of waste per year. By developing a WtE facility at this site, we are diverting waste already arriving to the site towards a solution that generates community benefits, rather than disposing of it. Co-location of complementary on-site waste solutions further removes the need for additional transport of byproducts.

As HiQ finalises and submits its environmental and planning applications, more detail will be available regarding any potential impacts. This information will be shared widely and transparently for all interested parties.

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

Victoria's waste-to-energy framework sets a 2.5 million tonne cap on the amount of waste that can be processed through WtE facilities. It is HiQ's view that this cap is beneficial in establishing a system which prevents overreliance on a single technology and reinforces the continued priority of waste avoidance,

system balance; ensuring that sufficient infrastructure exists to manage waste that cannot be feasibly recycled, while maintaining strong incentives for continued investment in recycling and circular economy initiatives.

Domestically, this policy is preferrable when compared with other jurisdictions. New South Wales, for example, has specified four discrete regions where WtE facilities can be developed and has no cap. With Victoria regulating the specific issue of system-wide processing, while allowing flexibility for industry to optimise business cases, it provides a clearer and more sound solution for the development of this infrastructure.

c) the regulatory framework to establish and manage WtE facilities

Victoria's regulatory framework for WtE facilities is developed to provide a comprehensive, multi-layered approach, currently led by Recycling Victoria (for cap licences and existing operator licences under the CE Act) and EPA Victoria (for development and operating licences under the EP Act). These are underpinned by the EU's BAT Reference Document for Waste Incineration (2019), the most well-developed international standard.

Proponents are currently required to operate under two licences: a Cap Licence issued by Recycling Victoria, and an Operating Licence issues by EPA Victoria. In the merging of Recycling Victoria and EPA Victoria set to occur later 2026, HiQ encourages an investigation into opportunities to streamline this licencing approach.

In terms of the existing environmental regulatory framework, proponents are required to obtain a Development Licence and, subsequently, an Operating Licence, both of which require completion of detailed technical assessments across a range of environmental and social aspects. In practice, these licences complement each other and provide proponents with clear conditions for ensuring they meet regulatory requirements at every stage.

Development licence applications typically include assessments of air quality, human health, noise, traffic, greenhouse gas emissions and climate change risk, supported by specialist studies and modelling. As demonstrated in the supporting technical documentation for the proposed facility, this process is designed to systematically identify potential risks and impacts, assess their likelihood and consequence, and define mitigation measures in accordance with established standards and guidance.

A key feature of Victoria's regulatory approach is the General Environmental Duty (GED) under the *EP Act*, which places a proactive obligation on proponents to minimise risks to human health and the environment so far as reasonably practicable. This shifts the focus from reactive compliance to upfront risk identification and management. Technical assessments are required to adopt recognised methodologies and standards and are subject to detailed review by regulators. In practice, this means that potential impacts must be clearly mapped, transparently assessed and supported by evidence-based mitigation measures before approvals can be granted.

In addition to technical scrutiny, the approvals pathway includes formal public exhibition and consultation processes. These provide opportunities for community members and stakeholders to review project information, ask questions and provide feedback. Proponents are expected to respond to this feedback

International experience supports the value of such structured approaches.

Jurisdictions with established WtE sectors, including the majority of western Europe, have recognised the detrimental impact that landfilling waste has on the environment and have effectively placed bans on organic waste to landfill. These jurisdictions combine strong regulatory oversight with strategic planning mechanisms to ensure WtE complements, rather than replaces, recycling systems. It ensures that infrastructure development is aligned with long-term environmental objectives, while maintaining flexibility to adapt as technologies and recovery systems continue to evolve, and embedding community participation and feedback at every stage.

2. The impact of WtE, including from

Major industry, such as waste management, require comprehensive management plans to ensure any impact is managed and opportunities are leveraged. HiQ's operations in Victoria support an integrated approach. With the site's existing waste and resource recovery activities, spanning recycling, organics processing, soil treatment and landfilling, our proposed WtE facility will support effective source separation, effectively manage any impact and deliver economic benefits for the local community and wider state.

a) separating recycling and organic material from WtE streams

It is important to begin with the acknowledgement that WtE infrastructure is designed to operate as part of an integrated waste management system. It focuses specifically on residual waste that cannot be feasibly reused or recycled, aligned with the TEEP principles and ensures that all materials that can be better processed in other ways are. In Victoria, a key principle underpinning the development and implementation of WtE, is that only residual streams of waste are suitable for thermal treatment, as outlined in the Victorian waste to energy framework (page 9)[9]. This is a principle that HiQ is actively supporting, through the development of our integrated precinct.

Effective separation of recycling and organic material is therefore fundamental to the operation of our proposed WtE facility and for the effectiveness of the circular economy precinct.

For WtE, this will be undertaken in two parts:

1. **Source separation:** Material is separated at the point of generation, through the use of Victoria's four-bin system, which plays a critical role in ensuring recyclable and organic materials are diverted away from household residual waste streams before they reach a WtE facility as well as similar source separation systems for businesses. This source separation approach is a critical measure as a first step to source separation, however, HiQ acknowledges that it requires ongoing focus and further embedding to achieve effective behaviour change across communities.
2. **Facility controls:** Waste acceptance procedures, including pre-authorisation of suppliers, weighbridge checks, documentation review and visual inspections, are implemented to ensure only permitted waste is received and processed. Loads that do not meet acceptance criteria are rejected or redirected to appropriate facilities. For HiQ, this means directing it to its onsite resource recovery facility or licenced landfill, reducing transport requirements and embedding a

[9] Victorian waste to energy framework, Victorian Government, https://www.vic.gov.au/sites/default/files/2022-02/Victorian%20waste%20to%20energy%20framework_0.pdf. Accessed March 2026.

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

HiQ supports strict regulations where they serve to minimise and monitor any potential emissions, encourage ongoing technology advancements and establish transparency and certainty for communities and regulators. Victoria has set stringent requirements for emissions, waste and byproduct management, which mirror international standards and global best practice.

As WtE infrastructure advances across the country, HiQ also welcomes and encourages federalisation of policy and emissions standards, where they support the goals of certainty, consistency and established standards for the operation of WtE in Australia.

EPA Victoria has established operating licence conditions[10] which set up a framework for risk management, record keeping and reporting. Any approved WtE facility would be subject to these conditions at a minimum.

More broadly, WtE facilities will be subject to strict operating conditions and regulatory oversight. HiQ's proposed facility will be designed to manage emissions and byproducts using established technologies and stringent controls and will comply with commissioning and operating conditions outlined in any Development Licence and Operating Licence issued.

Advanced air pollution control systems will be in place to treat flue gases before they are released through the facility's stack. Continuous emissions monitoring systems are typically employed in these facilities to track performance in real time and ensure compliance with regulatory limits, alongside ongoing monitoring and regulation by EPA Victoria.

Operating conditions established in Victoria mirror internationally recognised standards, including BAT for WtE, which are widely applied in jurisdictions such as the European Union. The proposed facility is designed with reference to these standards and comparable international facilities, reflecting a proven approach to emissions management. In Victoria, compliance is enforced through EPA licensing, which requires ongoing monitoring, reporting and independent verification.

WtE facilities also produce by-products such as Incinerator Bottom Ash (IBA) and air pollution control residues (APCr). IBA typically makes up 20-25% of the waste received, usually consisting of glass, ceramics, stones, dirt and metals that is recovered while APCr makes up around 3-5% of waste received and is responsibly and safely disposed[11]. WtE has transformed residual waste into byproducts which can now be recycled.

The two byproducts would be managed through established processes. IBA can be processed to recover metals and into aggregates that can be reused in road bases and other construction applications. APCr is handled and disposed of in accordance with regulatory requirements or better carbonated to light weight

[10] WtE operating licence conditions, EPA Victoria, https://www.epa.vic.gov.au/a08-waste-energy#operating-licence-conditions. Accessed March 2026.

[11] Energy-from-Waste (EfW) FAQs, Waste Management and Resource Recovery Association Australia, https://www.wmrr.asn.au/Web/Web/WARR_Industry/Energy_from_Waste_FAQs.aspx#:~:text=Residues,5%25%20of%20the%20waste%20received. Accessed March 2026.

As HiQ completes and finalises its environmental and planning applications, detailed assessments of emissions, air quality, human health and other environmental factors will be completed. These assessments are subject to regulatory review and public exhibition, ensuring that potential impacts are transparently evaluated and addressed prior to any approvals being granted.

Life Cycle Assessments of Greenhouse Gas impacts from WtE facilities consistently demonstrate a far better outcome compared to landfill.

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

WtE presents substantial economic benefits for communities and the wider state. With investments of up to $2 billion being placed in communities, the economic opportunities to be realised by local areas and the wider state are substantial.

In particular, these opportunities come in the form of:

- stabilising and diversifying waste management mix by providing a better alternative to landfill for residual waste, thereby reducing reliance on a single solution
- generating a consistent source of energy that can support on-site operations, local industry and the broader grid. Behind-the-metre solutions can also provide discounted energy, helping lower bills for businesses and the community
- creating price and rate stability for waste services through the establishment of long-term contracts
- improving efficiency and transport costs by co-locating WtE within a broader resource recovery precinct, and
- boosting local economies through job creation, supply chain support, hospitality and retail spend and community contributions.

Overall, WtE provides a complementary solution within Victoria's waste management system. By focusing on residual waste, operating within a robust regulatory framework and integrating with broader resource recovery infrastructure, it supports environmental, operational and economic outcomes without displacing recycling or other higher-order waste management practices.

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

It is HiQ's belief that effectively addressing the systemic challenges in the waste sector cannot be viewed in isolation. Integrated precincts that embed a range of technologies will ensure all materials are processed in the most appropriate way and that the significant benefits of the shift to a circular economy is embraced.

Government.

Five of these recommendations specifically related to WtE, of which four were supported in full and one supported in principle. These recommendations included:

- that the government develops a policy statement on WtE to provide certainty to investors and local government
- that the Victorian Government implements WtE technologies in Victoria, in conjunction with a future circular economy policy, as an alternative to landfill for residual waste
- that the Victorian Government remain 'technology agnostic' when developing a policy statement on WtE and that a policy statement should further emphasise the use of best practice technologies that minimise any impact on the environment and on public health
- that the Victorian Government ensure that WtE projects are informed by regional requirements that take into consideration the long-term needs and capacities of local councils, and
- that the Victorian Government develop a strong regulatory framework around public health outcomes for any WtE technologies adopted in the state, including in relation to monitoring of air and emissions, and that further clarity would need to be provided around hazardous waste disposal of byproducts and residues.

In subsequent years, within the scope of HiQ's observations on the policies released, regulatory requirements established and processes enforced on the industry, the Victorian Government has taken several measures to respond to these recommendations. This includes the release of:

- ***Environment Protection* Act 2017**[12]**,** which came into effect in July 2021 and legislates the principles of waste management hierarchy, formally recognising the recovery of energy in preference to containment and disposal.
- ***Circular Economy (Waste Reduction and Recycling)* Act 2021**[13], which recognises energy recovery from waste as a preferred step to treatment and landfilling.
- **Victorian waste to energy framework 2021**[14], which recognises WtE and supports WtE where they meet best practice environmental protection requirements, reduces waste to landfill, supports waste avoidance, reuse and recycling and demonstrates social licence with affected communities. This framework sets the capacity, site identification and operations of WtE in Victoria.

[12] Environment Protection Act 2017, Victorian Government. https://content.legislation.vic.gov.au/sites/default/files/2025-10/17-51aa021-authorised.pdf. Accessed March 2026.

[13] Circular Economy (Waste Reduction and Recycling) Act 2021, Victorian Government, https://www.legislation.vic.gov.au/as-made/acts/circular-economy-waste-reduction-and-recycling-act-2021. Accessed March 2026.

[14] Victorian waste to energy framework, Victorian Government, https://www.vic.gov.au/sites/default/files/2022-02/Victorian%20waste%20to%20energy%20framework_0.pdf. Accessed March 2026.

operating environment to enable best practice, balanced and safe development of WtE in Victoria - an environment that HiQ endorses. HiQ's integrated circular economy precinct is designed to manage waste in the most sustainable and effective way - whether that is treatment, organics composting, resource recovery, recycling or by recovering energy and byproduct for use in other ways.

It is important to acknowledge concerns raised in the 2020 Inquiry and by communities in Victoria and across the country, regarding WtE and a perceived potential for it to prevent innovation from taking place in higher-order waste management solutions.

Modelling is clear. With the VRIP projecting residual waste levels rising to 8.9 million tonnes per year by 2053, Victoria's WtE cap allows approximately one-third of total residual waste generated in the state to be processed by WtE[15]. This model ensures Victoria has a reliable stream of energy recovery facilities to process a portion of residual waste, while encouraging alternative technologies and methods to be designed and implemented as technologies continue to evolve over the coming years and decades.

When residual waste management options have been explored globally, there is a common outcome that technology does not currently exist that adequately manages residual waste at the scale and outcome required. Over many years, alternative solutions have been explored to manage this material, including pyrolysis, hydrothermal conversion, gasification and mechanical-biological treatment. However, these attempts to convert residual waste have not been successful, largely due to their inability to scale and achieve poor recycling outcomes.

Leading WtE facilities, aligned to global best practice and domestic regulations and requirements, are a critical element to improving how we extract as much value from resources across their lifecycle, but it is not the only one, and we encourage investment and innovation at every level.

As any infrastructure is developed, we prioritise engagement with the community to demonstrate the safety and importance of these technologies, while showing the huge benefits it could bring.

When they are delivered, Victoria stands to benefit from significant environmental and economic value, including creating hundreds of local jobs, reducing greenhouse gases, contributing millions each year to the local economy and supporting local communities.

4. The adequacy of community consultation

Developing complex infrastructure requires community consultation from proponents and operators, regulators and governments.

HiQ has a demonstrated commitment to ongoing engagement, having commenced WtE discussions in 2023 and continuing consistently in the years since. This commitment will continue for the duration of the facility's life. We also encourage government- and regulator-led consultation where it improves

[15] Victorian Recycling Infrastructure Plan 2024, Victorian Government, https://www.vic.gov.au/sites/default/files/2024-10/RV_Victorian-Recycling-Infrastructure-Plan-2024.pdf. Accessed March 2026.

HiQ's consultation began in 2023 and, in subsequent years, has involved into a comprehensive engagement program aligned with recognised best practice principles, including the IAP2 Public Participation Spectrum.

All engagement has been designed to ensure stakeholders are informed, have accessible opportunities to participate and can provide feedback to inform project development, planning and environmental approvals.

Throughout this time, HiQ has engaged with a broad range of stakeholders, including government agencies, local council, Members of Parliament, adjoining landholders, local residents and the wider community. We are guided by a focus on providing clear, accurate and accessible information while enabling meaningful two-way communication.

HiQ has deployed a wide range of activities to maximise reach and accessibility, including:

- community information sessions and webinars held across key project phases to provide detailed project information, share updates and answer questions
- pop-ups at Sunbury Square Shopping Centre and attendance at local events (including Sunbury Show) to provide a mechanism to hold constructive conversations with interested parties
- a letterbox drop to over 15,000 registered houses in Sunbury and Bulla, informing them of the proposal and ways to get involved
- direct engagement including one-on-one briefings with adjoining landholders and key stakeholders such as Hume City Council, EPA Victoria, members of the Department of Transport and Planning and the broader Victorian Government agencies, including Sustainability Victoria, Invest Victoria and others. This has included dedicated site tours and visits to introduce the site to each stakeholder and demonstrate its tangible value
- a dedicated project website and online engagement hub providing comprehensive information about HiQ's facility, WtE technology, technical details and project development updates, including responding to over 350 community questions in writing during the course of the engagement, which are all available online for ongoing transparency
- regular project updates distributed to a growing mailing list of stakeholders and community members, providing project updates
- ongoing access to a dedicated project email address and phoneline, encouraging direct enquiries with community members
- engagement with local and state media to support accurate information sharing within the community, as well as advertising ahead of information sessions
- site tours for interested parties to provide site context.

The scope of engagement undertaken to date is reflected through:

- an email distribution list of over 250 subscribers, receiving updates at milestones of the project
- over 150 residents engaging in discussions across eight pop-ups held at Sunbury Square Shopping Centre and 60 residents at the Sunbury Show 2025
- online information sessions held with approximately 170 interested parties

HiQ recognises that new infrastructure and technology can cause concern in the communities they operate in and we take our role in the community seriously. Effectively addressing these concerns requires collaborative efforts across proponents and the government. HiQ welcomes any effort to better work together across institutions to deliver a consistent, clear and transparent way of engaging communities on infrastructure that affects, and benefits, them.

5. Any other related matters

As mentioned, HiQ Sunbury is a Hub of State Significance, with a proven track record and capability to handle complex infrastructure and technology. It is now focused on the next generation of waste management, energy generation and resource recovery, and has substantial plans to support the growing Sunbury community and provide the amenities it will need for the long-term.

HiQ is earmarked within the Sunbury South Precinct Structure Plan for industrial and employment land, with nearby land zoned for residential growth.

As HiQ designs an integrated precinct aimed at shaping the state's future needs, leveraging existing planning pathways, WtE will be an anchor facility to support broader innovation. Its this approach that will see WtE form one part of a circular economy precinct, supporting communities and business for years to come.