



Legislative Council Economy and Infrastructure Committee

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

Hearing Date: 26 May 2026

Question[s] taken on notice

Directed to: HiQ

Received Date: 3 July 2026

1. **Moira DEEMING, page 28**

Question Asked:

In terms of emissions and contamination, can you compare the two for us – landfill and waste-to-energy?

Mark RODGERS: Moira, if that is okay, I am happy to share that particular data because I would hate to give you misleading stats. We have it and can share that, but is it okay if I take that on notice and come back?

Response: *See attachment*

Additional questions on notice from David ETTERSHANK

2. **Question Asked:**

Will you publicly release the HiQ cap licence application document?

Response: *See attachment*

3. **Question Asked:**

Can you confirm that you anticipate all waste sorting to be done at household level for MW and at the source for C&I waste and that HiQ has no planned waste auditing or sorting in place at the WtE plant?

Response: *See attachment*

4. **Question Asked:**

What would you like to see the government do, to gain social licence for WtE?

Response: *See attachment*

Parliamentary Inquiry Questions on Notice

Inquiry	Inquiry into the development and expansion of waste-to-energy infrastructure in Victoria
Date	1 July 2026
Directed to	HiQ
Witness	Mark Rodgers
Document purpose	Responses to questions taken on notice

The following responses are provided by HiQ for consideration in response to the questions taken on notice following the Legislative Council Economy and Infrastructure Committee hearing on 26 May 2026.

I. Moira DEEMING, page 28

Question asked: In terms of emissions and contamination, can you compare the two for us - landfill and waste-to-energy?

Response:

The comparison between landfill and waste-to-energy needs to be considered on a whole-of-system basis, noting that both options require strong environmental controls and regulatory oversight.

In broad terms, landfill and waste-to-energy have different environmental profiles:

- Landfill involves the long-term burial of waste. As organic material decomposes, landfill gas is generated, principally methane and carbon dioxide. Methane is a significantly more potent greenhouse gas than carbon dioxide. Landfill also requires ongoing management of leachate, odour, litter, vectors, landfill gas migration and long-term aftercare obligations. These risks can be managed, but they remain long-term liabilities over many decades.
- Waste-to-energy involves the thermal treatment of residual waste that is not practically recyclable or recoverable. It produces energy and materially reduces the volume of waste requiring final disposal. Modern waste-to-energy facilities are subject to strict emissions limits, continuous monitoring and advanced flue gas treatment systems. The main residual streams are bottom ash and air pollution control residues, which must be appropriately tested, classified and managed.

HiQ's position is that waste-to-energy should not replace waste avoidance, reuse, recycling or organics recovery. It should sit below those activities in the waste hierarchy and be used for genuine residual waste that would otherwise be sent to landfill.

From an emissions perspective, the key difference is that landfill creates methane over time from the decomposition of putrescible material, while waste-to-energy produces controlled point-source emissions at the time of treatment. The relative greenhouse outcome will depend on the composition of the residual waste, the efficiency of landfill gas capture, the energy recovered, the carbon intensity of displaced energy and the treatment standards applied.

From a contamination perspective, landfill presents long-term containment risks associated with leachate, landfill gas, odour and future aftercare. Waste-to-energy presents a different risk profile, focused on stack emissions, ash management and operational controls. Those risks are capable of being regulated through modern plant design, continuous monitoring, strict licence limits, transparent reporting and independent EPA oversight.

In summary, HiQ considers that appropriately regulated waste-to-energy can play a role in reducing reliance on landfill for residual waste, while supporting Victoria's circular economy objectives. It must,

however, be delivered as part of an integrated system that prioritises waste avoidance, recycling and organics diversion first.

2. David ETTERSHANK

Question asked: Will you publicly release the HiQ cap licence application document?

Response:

HiQ supports transparency in relation to the assessment, regulation and operation of waste-to-energy infrastructure.

At this stage, HiQ does not propose to publicly release the cap licence application in full, as the application contains commercially sensitive information, project development material and third-party inputs. However, HiQ is supportive of appropriate non-confidential information being made available through the relevant statutory and regulatory processes.

HiQ will continue to cooperate with Recycling Victoria, EPA Victoria and other relevant agencies in accordance with applicable legislative requirements, including any appropriate public consultation, information sharing or disclosure processes.

HiQ is also committed to providing clear public information about the project as it progresses, including the proposed role of the facility, the intended residual waste streams, environmental assessment processes, emissions controls, community engagement opportunities and regulatory approvals required before any facility could be developed or operated.

3. David ETTERSHANK

Question asked: Can you confirm that you anticipate all waste sorting to be done at household level for MW and at the source for C&I waste and that HiQ has no planned waste auditing or sorting in place at the WtE plant?

Response:

No. HiQ does not anticipate relying solely on household-level sorting for municipal waste or source separation for commercial and industrial waste.

HiQ's position is that waste-to-energy should only process residual waste after reasonable opportunities for avoidance, reuse, recycling and resource recovery have been applied. That requires controls across the supply chain, not only at the point of generation.

For municipal waste, source separation by households and councils is an important first step, particularly for recyclables, organics and problem materials. For commercial and industrial waste, source separation and upstream recovery are also important. However, HiQ recognises that additional controls are required to ensure that the material delivered to a waste-to-energy facility is appropriate residual waste.

HiQ would expect a waste acceptance and compliance framework to include measures such as:

- contractual controls on approved waste suppliers;
- waste acceptance criteria and prohibited materials lists;
- pre-qualification of suppliers and waste streams;
- [Periodic](#) load inspection and verification procedures;
- periodic waste audits;
- rejection or quarantine of non-conforming loads;
- record keeping and reporting; and
- ongoing compliance with licence and regulatory requirements.

HiQ does not propose that the waste-to-energy facility would operate as the primary sorting facility for the waste system. Rather, the facility would be designed to receive residual waste after upstream recovery and sorting has occurred. However, the facility would still require appropriate auditing, inspection and compliance controls to ensure that unsuitable materials are not accepted and that the facility operates in accordance with its approvals.

4. David ETTERSHANK

Question asked: What would you like to see the government do, to gain social licence for WtE?

Response:

HiQ considers that social licence for waste-to-energy will require clear government leadership, transparent regulation and genuine community engagement.

In particular, HiQ would encourage government to:

- provide a clear and consistent policy position on the role of waste-to-energy within Victoria's waste hierarchy and circular economy strategy;
- clearly communicate that waste-to-energy is intended for residual waste, not as a replacement for avoidance, reuse, recycling or organics recovery;
- ensure that the community has access to clear, independent information about emissions, health protections, ash management, monitoring and regulatory oversight;
- require transparent and enforceable licence conditions, including continuous emissions monitoring and public reporting where appropriate;
- support early and genuine engagement with host communities, councils and local stakeholders;
- provide clarity on the residual waste streams that are suitable for waste-to-energy and those that should be prioritised for recycling or other recovery pathways;
- ensure that planning, EPA and waste approvals are coordinated so communities can understand the full assessment pathway;
- support site visits, technical briefings and access to independent experts so that community concerns can be addressed on evidence rather than assumption;
- consider appropriate community benefit frameworks for host communities; and
- provide long-term policy certainty so councils, industry and communities can understand how waste-to-energy fits within Victoria's broader waste infrastructure needs.

HiQ's view is that social licence will not be achieved by industry alone. It will require government, regulators, councils, industry and communities to work together under a transparent framework that is clear about the purpose of waste-to-energy, the standards facilities must meet, and the role it plays in reducing reliance on landfill for residual waste.