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Submitted via [online portal](#)

8 April 2025

Dear Mr Bradley

**Re: *Victoria's 2026-30 Climate Change Strategy***

Thank you for the opportunity to provide feedback on *Victoria's 2026-30 Climate Change Strategy*. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$17 billion waste and resource recovery (WARR) industry. With more than 2,300 members from over 410 entities nationwide, we represent the breadth and depth of the sector, including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs), including research bodies. In Victoria, WMRR represents over 530 individual members from more than 90 entities.

WMRR members are involved in a range of important activities within the Australian economy, including infrastructure investment and operations, collection, manufacturing of valuable products from resource recovery, energy recovery as well as community engagement and education. Being at the forefront of the ongoing evolution towards whole-of-system thinking and the development of a circular economy, WMRR continues to advocate to drive knowledge and understanding of the value a systems-based approach to material management plays in addressing greenhouse gas (GHG) emissions and carbon abatement. A circular economy also emphasises design, extended producer responsibility and the provision of clear pathways for the use of secondary raw materials in order to keep valuable materials in circulation at their highest and best use for longer. Key to WMRR's advocacy is to urge all levels of government to apply a 'systems lens' and consider WARR within the context of broader supply chains and systems, and recognise the clear role the industry plays in achieving net-zero.

Victoria's *Climate Change Strategy 2021-2025* strongly aligns with WMRR's advocacy for the avoidance of landfilling and eliminating the creation of waste in the first instance - both key factors in effectively managing the impacts of climate change. There is an obvious nexus between the WARR industry's operations and the management and reduction of greenhouse gas (GHG) emissions in particular – with the reduction of organics to landfill expressly referred to within the strategy. The initial strategy's commitment of \$515 million to reform and transform the waste sector (inclusive of the introduction of Recycling Victoria) has assisted in decreasing Victoria's emissions by 31.3 per cent between 2005 and 2022 and bringing forward its legislated commitment to achieve net-zero from 2050 to 2045. Legislating interim targets for 2025, 2030 and 2035, has provided a clear path to net-zero emissions and regulatory certainty to support investment in WARR technologies.

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However, the existing strategy does not recognise the crucial role that utilising secondary raw materials plays in reducing carbon emissions. According to the Ellen Macarthur Foundation's 2021 paper [Completing the Picture: How the circular economy tackles climate change](#), 45% of emissions are associated with making products. This analysis articulates a real and measurable opportunity for governments to reduce emissions by identifying points in our supply chains where more sustainable material product choices can replace virgin materials, and provide both economic and regulatory incentives to drive uptake.

Since the strategy's release five (5) years ago, the Victorian Government has made a firm commitment to transition to a circular economy, with the introduction of the *Circular Economy (Waste and Recycling) Act 2021*, the *Victorian Recycling Infrastructure Plan* and the release of the circular economy plan, [Recycling Victoria: A new economy](#). These all recognise the increased recovery and reuse of materials and reduced use of virgin resources (including energy savings), and reduced transport of materials between precincts as being key outcomes for a circular economy for Victorians. There is a real opportunity for Victoria's *Climate Change Strategy 2026-2030* to recognise that these actions are also instrumental in helping Victoria decarbonise and build greater preparedness and resilience to climate change risks.

#### *The importance of linking circular economy and climate change outcomes*

Australia's circular future is dependent on the growth of secondary raw materials as key contributors to Australian supply chains – something Victoria recognises through its *Circular Economy (Waste and Recycling) Act 2021*, and is promoting through the *Recycled First Policy* and EcologiQ. The EPA's *Draft Strategy of Regulatory Intent* also identifies the circular economy within its regulatory strategy to address risks from climate change. Fortunately, Victoria is now in a position to measurably demonstrate the link between decarbonization and enhancing policy and markets to support secondary raw materials via its recently released [Circular Economy Market Report \(CEMR\)](#). The CEMR shows that Victoria generated 14.5 million tonnes of waste material in 2022–23, with 9.9 million tonnes recovered for reprocessing, resulting in a state-wide recovery rate of 69% with an estimated \$1.8 billion worth of materials put back into the economy in the 2022–23 financial year. Victoria's targets of net-zero emissions by 2045 and of maximising landfill diversion and minimising waste generation have assisted in propelling the state's circular economy performance with a circularity rate of 7.5%, a material footprint of 28.1 tonnes per person and material productivity of \$3.49 per kilogram of materials consumed. This rate has to be understood against other states however, that have large mining and resource sectors, which Victoria does not.

2022 emissions data however demonstrates that Victoria is the third largest state or territory contributor to Australia's emissions (19.6%). Burning coal and gas in power stations to generate electricity accounts for 48% of Victoria's emissions, whilst waste (primarily food and organics breaking down in landfills and treatment of wastewater) accounts for 3.8%. This emissions data shows there is a real opportunity to further reduce emissions where fossil fuel use can be avoided. The utilisation of materials from the resource recovery sector i.e. remanufactured/ reprocessed and recycled materials instead of virgin materials necessarily mitigates the initial production energy expenditure associated with manufacturing. For example, recycling aluminum significantly reduces carbon emissions compared to producing it from virgin materials, requiring only about 5% of the energy and resulting in a substantial reduction in greenhouse gas emissions. Strengthening the strategy's link to the goal of a circular economy would align with existing policies to promote the return of substantial quantities of high-quality secondary raw materials to productive use and is key to Victoria further improving its circularity rate.

Hence in WMRR's view, the *Climate Change Strategy 2026-2030* should expressly acknowledge the interconnectedness of the WARR industry, decarbonization and climate change in driving Victoria's circular economy rather than focusing attention simply on the diversion of material from landfill- which is linear and disappointing. WMRR notes that the existing five (5) point plan articulated within the initial strategy primarily refers to our essential sector in terms of diverting material from landfill. In particular, point four (4): climate smart business and communities (including lower emissions from waste and the creation of a circular economy) specifically references to the 2030 target of halving the volume of organics sent to landfill. This is understandable given the data that two-thirds of Victoria's emissions from the waste sector are coming from the decomposition of organic material in landfill. The initial strategy also aims for waste generation to be down 15 per cent per person in 2030 on 2005 levels, further supporting a focus on reducing volumes sent to landfill. Given Victoria's refreshed focus on circularity and material productivity metrics, it would be prudent for the *Climate Change Strategy 2026-2030* to incorporate more circular thinking by setting targets to further reduce emissions by choosing recovered materials over virgin materials.

WMRR recommends that:

- the five-point plan is revised with a preamble to clearly acknowledge the interconnectedness of recovered resources, carbon mitigation, climate change and investment in innovative technologies as key contributors to the circular economy, which underpins each of the five-points - being the clean energy economy, innovation for the future, resilient farms and forests, climate smart business and communities (including lower emissions from waste), and a climate resilient Victoria.
- the existing Emissions Reduction Pledge for the waste sector - to halve the amount of organic waste going to landfill by 2030 while supporting emerging waste and recycling industries and economic opportunities across the state - is revised to include a commitment to continue designing out waste and increasing uptake of recovered materials in existing supply chains.

Given the momentum Victoria has in 2025 in moving towards net-zero and promoting circular outcomes, expressly including wording in the *Climate Change Strategy 2026-2030* attributing the positive impact of resource recovery activities and replacing virgin materials - undertaken by the WARR sector in creating and using secondary raw materials - has on carbon mitigation would further support Victoria's updated policy and regulatory settings which have already established the state's commitment to a circular economy.

WMRR's responses to the survey questions can be found at [Annexure A](#). Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely



Gayle Sloan

**Chief Executive Officer**

Waste Management and Resource Recovery Association of Australia

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## Survey Questions:

| Question                                                                                                                   | WMRR response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| <b>What is most important to you in the Victorian Government response to climate change?</b>                               | As detailed in WMRR's submission, Victoria's policy and regulatory landscape in the last five (5) years has markedly shifted towards acute focus on achieving a circular economy. The nexus between improved circularity and mitigating carbon emissions should be reflected in the updated response to climate change. Acknowledging the fundamental link between increased uptake of recovered resources over virgin materials with decreased emissions is vital.                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>What do you see as the biggest opportunities and benefits of taking action on climate change?</b>                       | There is a real opportunity for the state to enhance its efforts towards net-zero by driving an improved uptake of secondary raw materials in supply chains. This not only avoids landfill emissions and minimises negative environmental impacts by avoiding the creation of waste, but in many cases enables less fossil fuel use via recycling and reprocessing when compared to extracting virgin materials or manufacturing 'new' products.                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>What do you think is most important to reducing Victoria's greenhouse gas emissions and achieving net-zero by 2045?</b> | Continuing to recognise the interconnectedness of the WARR industry with net-zero and circular outcomes is most important, as certainty of policy and regulatory settings that commit to achieving net-zero and circularity outcomes will underpin innovation and investment in our essential sector. This flows through to incentivising those proposed projects and innovations within current supply chains which demonstrably emit less GHGs than the alternative.                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>What do you see as the main challenges in reducing greenhouse gas emissions?</b>                                        | There is a lack of incentives for the use of recovered materials in supply chains. Recognition that these materials meaningfully contribute to reducing emissions would be beneficial to both climate change and circular economy outcomes. The traditional thinking that emissions are something to be 'captured' at the end of a process, rather than actively reduced through choosing alternative pathways (such as utilizing recovered materials in supply chains rather than sourcing virgin products) is one of the main challenges for the WARR sector. Whilst landfill diversion impacts can be measured in this regard (via year-on-year emission reductions), there is currently a lack of data on the emissions profile for remanufacturing processes demonstrating the measurable impacts of utilising recovered materials instead of 'new'. |
| <b>What is most important to you in the Victorian Government response to climate change?</b>                               | As per WMRR's submission, it is most important to apply the 'systems lens' to the strategy to recognise the interconnectedness of the WARR sector with achieving net-zero and circular economy outcomes, and complement the recent policy and regulatory instruments that have been introduced in Victoria over the last five (5) years, such as the <i>Recycling Victoria: A New Economy</i> plan, the <i>Circular Economy (Waste and Recycling) Act 2021</i> , the <i>Victorian Recycling Infrastructure Plan</i> and the release of the <i>Circular Economy Market Report</i> .                                                                                                                                                                                                                                                                        |
| <b>What is most important to you in managing the increasing impacts of climate change across Victoria?</b>                 | There is a real opportunity for the WARR sector to contribute meaningfully to further mitigating the impacts of climate change through increased market uptake of recovered resources in supply chains. Ensuring that Victoria's commitment to climate change and decarbonisation works in partnership with the existing circular economy policies and regulations will support increased capacity for the sector to reduce the use of virgin resources via investment and innovation in the WARR sector. This is why it is crucial that the strategy is clear about the opportunity proffered by the WARR sector to help Victoria meet the goals of net-zero and improve Victoria's circularity metrics.                                                                                                                                                 |

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| <p><b>What do you see as the biggest challenges in managing the increasing impacts of climate change?</b></p>     | <p>Cost and accessibility of products is the biggest challenge. In terms of developing strong end markets for recycled materials – which could contribute meaningfully to reducing the impacts of climate change by displacing the emissions associated with extracting and sourcing virgin materials – the biggest challenge is the lack of economic incentives for those in supply chains to choose recovered materials. The economies of scale of global markets, and the lack of local reprocessing infrastructure can result in significant cost differentials between choosing a recycled/remanufactured/recovered/reprocessed product over a new one.</p> <p>Victoria is already doing some work to redress this imbalance, focusing on roads infrastructure supply chains through the <i>Recycled First</i> policy and ecologiQ. Ideally, more would be done to incentivise the procurement and demand for recycled materials. Whilst outside the scope of this strategy, WMRR has advocated for increasing recycled content thresholds across all government procurement and incentivising investment in new facilities and technologies (such as continuing the Recycling Modernisation Fund).</p> |
| <p><b>What could the Victorian Government do to help you manage the increasing impacts of climate change?</b></p> | <p>As mentioned throughout the submission, WMRR fiercely advocates for the principles of the waste hierarchy and an economy that uses less for longer. We have suggested that the <i>Climate Change Strategy 2026-2030</i> looks to include express provisions that link emissions reduction with circular economy outcomes. This will shift the conversation for the WARR sector away from ‘diverting from landfill’ and propel further investment away from disposal solutions and towards solutions focused on the reinvestment of resources into the economy, coupled with the designing out of waste.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |