

The Hon Ben Carroll
Premier of Victoria
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Dear Premier

WMRR Victorian Election Priorities 2026: A system, not simply a collection service

The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body for Australia's waste and resource recovery (WARR) sector, representing more than 2,300 members from around 400 organisations across the entire material management value chain—from collection, recycling and organics processing to remanufacturing, waste-to-energy (WtE) and landfill.

WMRR brings together all three (3) tiers of government, universities, not-for-profit organisations and private businesses to advance an Australian circular economy that uses fewer resources and keeps materials in productive use for longer. In Victoria, WMRR represents more than 530 individual members from over 90 organisations.

Victoria's WARR sector is essential to public health, environmental protection and the functioning of the economy. Every home, hospital, business and construction project depends on discarded materials being safely managed. After collection, those materials must be sorted, processed and transported to a facility that can recover their value or safely manage what remains. Recovered glass, metals, plastics and other materials then need a manufacturer or buyer able to use them. This work depends on an interconnected network of skilled workers, specialised facilities, transport systems, technology and markets. A collection service is only as reliable as the infrastructure and destinations behind it.

In Victoria the WARR sector contributes \$3.72 billion to Victoria's economy annually and employs more than 12,300 people. Its wider contribution includes supplying recovered inputs to manufacturers, supporting construction and regional industry, and reducing dependence on virgin resources. With the right settings, this essential service can attract further investment, create skilled jobs and help Victoria reduce emissions across the economy.

The carbon opportunity extends well beyond emissions from waste facilities. Reusing a product or replacing virgin material with recovered material can avoid some of the extraction and manufacturing needed to produce its replacement. Processing food and garden waste through appropriate organics facilities can reduce methane generation from landfill. Waste-to-energy can recover energy from suitable residual material that cannot practically be reused or recycled. These activities must follow the waste management hierarchy: prevent waste first, then prioritise reuse and recycling, recover energy from suitable residuals, and safely dispose of what remains. Victoria's climate and industrial policies must recognise these contributions and support investment that delivers measurable benefits across the material life cycle.

Victoria has established important foundations through its Container Deposit Scheme (CDS), kerbside reforms, WtE framework and investment in recycling infrastructure. The *Circular Economy (Waste Reduction and Recycling) Act 2021*, Victorian Recycling Infrastructure Plan (VRIP), Victoria's Big Build, Recycled First policy and Recycling Victoria: A new economy have also set a direction for reform. The next phase must turn these commitments into operating infrastructure, commercially viable markets and predictable investment settings.

The urgency is already evident. The VRIP Annual Progress Report 2024–25 identifies pressing residual-waste capacity challenges in Melbourne's southeast and warns of wider pressures around the mid-2030s. This is not simply a question of how much landfill space remains statewide: facilities must also be able to accept the required volumes each day and be accessible to the communities they serve. Infrastructure decisions made during the next term of government will determine whether Victoria can manage this transition safely and affordably.

Success must be measured by outcomes: waste prevented, materials kept in productive use, virgin resources displaced, emissions reduced, investment delivered and jobs created. Victoria also needs sufficient capacity to safely manage the residual and hazardous wastes that remain. Bin numbers and collection frequency alone cannot measure the performance of this complex, essential industry.

WMRR is therefore seeking commitments to six (6) priority actions during the next term of government.

1. Solve Victoria's infrastructure and residual-waste challenge.

Even with better prevention and recycling, Victoria will continue to generate residual waste—the material left after practical reuse and recovery options have been exhausted. That material still needs a safe destination. The immediate question is where it will go when existing facilities close, and whether replacements will be operating in time. Capacity lost in one (1) part of the system places pressure on the rest, with potential consequences for service continuity, transport costs, emissions and community safety.

The next government must ensure that infrastructure keeps pace with Victoria's growing population and economy by:

- Urgently addressing Melbourne's southeast residual-waste capacity challenge. The approaching closure of Hallam Road Landfill creates an urgent need for replacement capacity and transfer infrastructure. Transfer stations receive material from collection trucks and consolidate it for transport in larger vehicles to processing or disposal facilities. Without sufficient transfer capacity, a distant replacement facility may not provide a practical solution for local collection services. The VRIP Annual Progress Report identifies additional transfer capacity as necessary for transport to the proposed Maryvale WtE facility, and to support alternative landfill destinations if that facility is not operational in time. The proposed Hampton Park Transfer Station requires an urgent, coordinated government assessment, alongside a credible contingency plan for any gap between landfill closure and replacement facilities becoming operational. Decisions must account for delivery lead times, transport requirements and the continuity of essential services.
- Delivering a funded, binding and implementable long-term infrastructure plan covering recycling, organics, residual waste, WtE, hazardous waste, transfer infrastructure and remanufacturing. It must translate identified needs into protected strategic locations, delivery milestones and coordinated approval pathways. Building on the network approach established through the Statewide Waste and Resource Recovery Infrastructure Plan, Victoria needs a clear spatial picture of how facilities, material flows, markets and transport corridors will work together. Strategic sites must be protected from incompatible development and encroachment. Planning and environmental regulators must assess necessary infrastructure within predictable timeframes, while maintaining appropriate standards and community engagement.

Infrastructure planning must also support emissions reduction. Organics processing, recycling and remanufacturing need reliable pathways to market; WtE must serve suitable residual waste within the hierarchy; and landfill remains necessary for materials that cannot be safely recovered. Investment decisions should consider service resilience and whole-of-life emissions, including transport and avoided production, rather than assess individual facilities in isolation.

Waste and resource recovery infrastructure is essential infrastructure. Victoria must plan for its delivery before a capacity shortfall becomes a service crisis.

2. Expand CDS. Lose the fourth bin. Focus on outcomes.

Victoria's CDS allows people to return eligible beverage containers for a refund through a dedicated collection network funded by beverage suppliers. Victoria should build on this investment by expanding the scheme to include wine and spirit bottles. An expanded scheme would capture more beverage glass separately from other recyclables, providing high-quality material for recycling, and bring Victoria into line with all other Australian mainland states in 2027.

This should be accompanied by reconsideration of the mandatory separate household glass bin—the fourth bin alongside general waste, mixed recycling and food and garden organics. With an expanded CDS and existing kerbside recovery infrastructure, councils should be able to demonstrate the most effective approach for their communities, including how they will recover glass outside the CDS. Decisions should compare actual recovery, material quality, cost and whole-of-life emissions—including collection and transport—rather than assume that an additional bin necessarily delivers a better result.

Requiring households and councils to fund another collection service should depend on the additional benefit demonstrated. Victoria should use the recovery infrastructure it has already funded and allow service arrangements that achieve strong outcomes without unnecessary duplication.

The objective must be more glass returned to productive use at the lowest reasonable environmental and economic cost.

3. Create clear, coordinated and accountable regulation.

Victoria's institutional changes make clear accountability essential. Sustainability Victoria (SV) previously supported circular economy programmes and investment; Recycling Victoria (RV) had responsibilities for sector oversight and reform. Following SV's closure and RV's integration into EPA Victoria, industry needs to know who is responsible for circular economy policy, infrastructure planning, market development, service standards and environmental regulation. These functions must have clear mandates, adequate resources, certain enforceable timeframes and consistent engagement with industry.

EPA Victoria's environmental protection and compliance role is essential. Equally, Victoria needs a distinct function responsible for developing markets, facilitating infrastructure and supporting investment. WMRR seeks a clearly accountable circular economy and market-development function within DEECA, with responsibilities distinguishable from those of the regulator. Industry should not have to navigate overlapping mandates or uncertainty about where investment barriers will be resolved.

The next government must establish coordinated approval pathways across EPA, DEECA, planning authorities and councils, with published assessment requirements, statutory decision timeframes and consistent, proportionate, risk-based regulation. A facility may need separate decisions about where it can be built, how it can operate and, for certain WtE projects, its allocation under Victoria's limit on thermal treatment capacity. These decisions must operate as a coherent pathway, with clear sequencing and requirements, so investors can understand what is needed and when a project can proceed.

Policy certainty has a direct bearing on investment. Facilities require substantial capital, long development periods and confidence in future feedstock and markets. Unclear responsibilities and unpredictable approval processes can delay projects, increase financing costs and leave essential capacity undelivered. Government must provide regular senior-level industry engagement, early notification of regulatory changes and workable transition arrangements.

Clear regulation protects the environment and gives businesses the confidence to invest in the infrastructure Victoria needs.

4. Create markets—not simply more recovered material.

Victoria's circular economy depends on recovered materials replacing virgin resources in products and infrastructure. A processor can produce recycled plastic, glass or aggregate, but needs a buyer willing and able to use it. Without that demand, collecting more material does not complete the recovery process or provide a reliable return on investment. Government's purchasing power and infrastructure expenditure can help create demand, give investors' confidence and support manufacturers adopting recovered inputs. Victoria's Recycled First Policy, and Ecologi were established to encourage the use of recycled and reused materials in transport infrastructure. WMRR welcomes these foundations, but stronger, measurable implementation across government is needed.

The next Victorian Government must:

- Introduce progressively increasing mandatory recycled-content requirements across government procurement and major publicly funded infrastructure, with clear minimum percentages, delivery timeframes and public reporting of actual use. Procurement should also assess whole-of-life emissions and recognise verified benefits from replacing virgin inputs, alongside performance, safety and value for money.
- Revise specifications that unnecessarily exclude or restrict recovered materials, enabling products that meet appropriate performance and safety standards to compete with virgin alternatives. Government should work with industry to resolve testing, certification and approval barriers that prevent suitable recycled products from gaining market acceptance.
- Review the delivery, utilisation and commercial outcomes of publicly supported recycling infrastructure, including facilities funded through the Recycling Modernisation Fund. Government support must extend beyond awarding grants to working with industry to bring projects into operation, overcome barriers to market adoption and secure sustained demand. Success must be assessed by whether facilities are operating, outputs are finding viable markets and recovered materials are replacing virgin inputs. Processing capacity, utilisation, investment, jobs and verified environmental benefits should be considered together.

The goal must be to sustain replacement of virgin resources with recycled and recovered materials across the supply chain. Demand gives processing infrastructure a commercial purpose and supports further investment. Without it, additional capacity risks producing stockpiles rather than circular outcomes.

5. Put responsibility where it belongs.

Victoria cannot continue asking households, councils and the WARR industry to carry the consequences of increasingly complex products while those who design, manufacture, import, sell and profit from them bear insufficient responsibility. A battery concealed inside a discarded product can enter a collection truck or sorting facility and ignite when damaged. Products made from incompatible materials may be difficult to separate and recycle, while harmful chemicals can compromise recovered outputs. These are problems that recovery facilities cannot eliminate simply through better collection or processing. They require action before products reach the waste stream.

The next Victorian Government must:

- Accelerate mandatory stewardship for batteries and battery-embedded products, committing to a mandatory Victorian framework in 2027 aligned with NSW's *Product Lifecycle Responsibility Act 2025*. Battery fires threaten workers, collection vehicles, facilities and the continuity of essential services. Safe collection and treatment must be funded by those placing these products on the market, supported by effective public education and enforceable obligations.
- Commit to securing nationally consistent, mandatory extended producer responsibility (EPR) arrangements for packaging, solar panels, e-waste and other priority products, while progressing state action where national reform is delayed. Schemes must address design, repairability, reuse, harmful substances, recycled content and end-of-life management, with independent oversight, transparent reporting and verified recovery destinations.

EPR requires producers to take responsibility for the products they place on the market, including funding their management after use. It does not create the cost of managing discarded products; that cost already exists. Too much is currently transferred to councils, ratepayers, recyclers and the wider community. Producer responsibility allocates those costs more fairly and gives producers an incentive to prevent them through better design. Well-designed schemes can also provide reliable funding and material flows, supporting investment in safe collection, recycling and remanufacturing.

The principle is straightforward: those placing products and packaging on the Victorian market must take responsibility for their impacts throughout the life cycle. Industry cannot deliver circular outcomes on its own if products enter the system without a viable recovery pathway.

6. Provide policy certainty with transparent long-term levy settings.

The landfill levy is a charge on disposal that helps make recovery more competitive with landfill. Discarding materials after one (1) use loses their economic value and can require further extraction and manufacturing to replace them. Keeping materials in productive use offers an opportunity to reduce both resource demand and associated emissions. Victoria's levy should support that transition by improving the economics of recovery and helping fund the infrastructure and markets needed to make it viable.

The next Victorian Government must establish a transparent, long-term landfill levy trajectory, coordinated with other mainland states and informed by the costs and economics of recovery. Investors need sufficient notice to assess projects, secure finance and enter long-term contracts. Levy settings must work alongside infrastructure delivery, market development and consistent enforcement so that higher disposal costs support genuine recovery outcomes.

At least 50% of levy revenue should be reinvested in waste and resource recovery infrastructure, market development, hazardous-waste management, education, data and regional capability. This reinvestment should follow a published, multi-year programme with clear priorities and transparent reporting. Government should track whether funding brings facilities into operation, increases utilisation, secures markets, attracts private investment and creates jobs, alongside verified resource and emissions benefits.

Victoria must also connect waste and circular economy policy with its climate and industrial strategies. Funding and procurement decisions should recognise emissions avoided across material life cycles, not only emissions recorded at individual facilities. This requires credible measurement and recognition of the sector's essential-service role and its responsibility for managing materials discarded by the wider economy.

The levy must help turn discarded material into productive value. Predictable settings and transparent reinvestment can give industry the confidence to build the capacity Victoria needs.

WMRR and its Victorian members stand ready to work with all parties to deliver these reforms. The next term of government is an opportunity to secure reliable essential services while attracting investment, supporting manufacturing and reducing emissions across the economy. We seek clear commitments to these six priorities, with accountable delivery, defined timeframes and regular engagement with industry.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Gayle Sloan".

Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia