

The Hon Ben Carroll
Premier of Victoria
Office of the Premier
1 Treasury Place
Melbourne, Victoria 3002
By Email: ben.carroll@parliament.vic.gov.au

14 October 2026

Dear Premier

Waste to energy policy and Victoria's residual waste capacity

The Waste Management and Resource Recovery Association of Australia (WMRR) writes to express serious concern about Labor's announcement of a mandatory two-kilometer buffer between new waste-to-energy project boundaries and existing homes. This represents another significant change to the investment settings for essential infrastructure while Melbourne's south-east faces an unresolved residual waste capacity crisis.

WMRR is the national peak body representing the waste and resource recovery industry across the supply chain. Our members provide essential public health and environmental services that Victorian households, businesses and councils rely on every day.

Since the adoption of the *Recycling Victoria: A New Economy Strategy* in 2018, your government has encouraged investment in waste to energy through its *sustainable framework*, established a unique cap licensing scheme, invited industry to develop projects within that framework and allocated cap approvals under this scheme. Proponents have committed substantial development capital in response. This announcement creates uncertainty about whether those projects can proceed and where the waste they were intending to manage will go.

The Government must take responsibility for delivering a workable residual waste system. Collecting a bin is only the first step: its contents must have an authorised, available destination.

The southeast requires delivery now

The Government's Victorian Recycling Infrastructure Plan (VRIP) Annual Progress Report 2024–25 projects that Hallam Road landfill will reach capacity by 2030. It identifies continuing landfill pressures in Melbourne's south-east and a potential transfer capacity shortfall if replacement infrastructure is not delivered in time. It also identifies waste to energy as critical to meeting Victoria's future residual waste needs.

Nine (9) councils have already undertaken the Southeast Metropolitan Advanced Waste Processing (SEMAWP) procurement, selecting Maryvale as an alternative to landfill. That process, the lengthy development of the cap scheme and the replacement of the previous infrastructure planning framework with the VRIP have consumed years and significant government and industry funding. They must now translate into operational capacity.

WMRR considers that this Government's failure to deliver a timely, coordinated response has allowed a known challenge to become an increasingly urgent crisis. Further policy changes that delay or remove capacity will compound that failure.

The parliamentary inquiry does not support the announced approach

The Legislative Council Economy and Infrastructure Committee's report, tabled on 25 August 2026, provides a clear basis for addressing these issues. We draw your attention to the following adopted findings and recommendations.

- Recommendation 15: That the Victorian Government provide clear, evidence-based information to the public regarding thermal waste-to-energy.
- Recommendation 26: called for accessible explanations of how separation distances are determined, the relevant factors and their appropriateness. It did not recommend a mandatory two-kilometer buffer. This was the adopted position of a Committee with both Labor and Liberal representation.
- Recommendation 31: That the Victorian Government review how the waste-to-energy approvals process is communicated to communities to ensure the sequencing of approvals does not inadvertently undermine confidence in subsequent consultation and decision-making.
- Finding 42 warned that inconsistent government messaging, particularly from Ministers, could undermine public confidence in waste-to-energy safety.
- Findings 43 and 44 identified uncertainty in the planning framework and the absence of a coordinated statewide strategy for developing waste-to-energy infrastructure.
- Finding 47 recognised increasing land use conflicts as housing expands towards established waste and industrial areas.

The announcement on 11 October 2026 risks repeating the inconsistency identified by the inquiry. Government cannot credibly promote this technology as part of its infrastructure solution while continually changing the conditions for its delivery. Modern waste-to-energy technology is proven internationally and operates safely under stringent standards. WMRR supports its use for residual material within the waste hierarchy, alongside rigorous environmental assessment, enforceable emissions controls, transparent monitoring and meaningful community consultation.

Protect investment and assess the statewide consequences

The announcement exempts currently operating facilities but does not clearly explain the position of proponents holding cap licenses, planning approvals or environmental permissions whose facilities are not yet operating. A cap license does not replace other approvals, but issuing one (1) is a significant government decision around which proponents make investment decisions.

We seek written clarification of:

1. Which existing license holders and projects under development would be subject to the buffer, and what transitional protections would apply to capital already committed in reliance on the Government's framework.
2. Whether the Government has assessed how many proposed facilities, and how much annual treatment capacity, would become unviable under the rule; and whether it will publish that assessment.
3. How any lost or delayed capacity would be replaced, including the consequences for council contracts, transport distances, service costs and ratepayers.
4. How future residential development would be managed around established waste precincts and approved projects.

Address encroachment through coordinated planning

Victoria must plan housing and the essential infrastructure that supports it together. Appropriate separation must be secured through coordinated land use planning, protection of established precincts and assessment of local conditions. Allowing residential encroachment and then restricting the infrastructure needed to serve those communities perpetuates the conflict.

WMRR calls on your government to provide clear transitional arrangements for existing proponents and deliver a time-bound south-east residual waste capacity plan. That plan must identify treatment and transfer infrastructure, contingency destinations, delivery milestones and accountable agencies. It must be supported by coordinated approvals and stable investment settings.

Continued changes in direction make it harder to finance facilities and retain investment in Victoria. Households and businesses ultimately bear the costs of delay. Our industry is an essential service and cannot be treated as a political toy.

We request an urgent meeting with you and the environment minister, together with a written response to the above questions.

Victoria needs a government that takes responsibility for the whole system and delivers the capacity its communities require. We look forward to discussing this with you directly.

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

CC: Ms Jaclyn Symes

Minister for Energy and Resources, Minister for Environment, Minister for Climate Action,

Minister for the State Electricity Commission

Level 17, 8 Nicholson Street

East Melbourne VIC 3002

By Email: jaclyn.symes@parliament.vic.gov.au