

2 February 2024

RE. STRIKING THE RIGHT BALANCE FOR WASTE TO ENERGY IN VICTORIA

Introduction

We, the undersigned, appreciate the opportunity to provide our feedback via this joint submission to the Department of Energy, Environment and Climate Change's (DEECA) Waste to Energy Scheme Regulatory Impact Statement¹ and its proposed regulations². We totally agree, it is very important to strike the right balance for waste to energy (WtE) in Victoria especially the types of permitted technologies.

As there's been no prior opportunity, this submission also seeks to inform the Victorian government that **we do not support the incineration of municipal solid waste (MSW)**. We do not believe this expensive, unsafe technology has any legitimate role to play in the state's transition to a circular economy. The public expects all levels of government to work collaboratively to urgently tackle the problems of plastic pollution and packaging waste with effective solutions in keeping with a clean tech, zero emissions future.

The community supports Victoria's transition to a circular economy and agrees the government must strengthen its laws and regulations for the waste, recycling and resource recovery sector. The ABC TV series, War on Waste³ awakened us to unsustainable consumption habits and wasteful business practices. It is pleasing to see the Container Deposit Scheme (CDS) rolling out across the state. We welcome the call in Recycling Victoria's policy for us to "*become world-class recyclers, repairers, resellers and reusers*".⁴ Waste minimisation is everyone's responsibility and all stakeholders need to adopt the waste hierarchy: Rethink ~ Reduce ~ Reuse ~ Repair ~ Recycle.

General comments

While reducing waste volumes going to landfill is common sense, there's growing public concern about the emerging alternative of waste incineration and the proliferation of these projects in Victoria and across the nation. Far from being a transitional solution, burning municipal waste imposes a toxic outdated linear approach on affected communities for the next 25 years. This waste disposal paradigm impedes the transition to a circular economy and will draw investment away from innovative recycling initiatives and their subsequent employment opportunities. This is already happening in WA, where because of its waste contract with Avertas, the City of South Perth says it cannot comply with the state's FOGO deadline.⁵

The Victorian Government claims it supports waste to energy technologies where they: * meet best-practice environment protection; * reduce the amount of waste sent to landfill; * reduce greenhouse gas emissions; * meet best-practice energy efficiency; and * create jobs and economic development. We contend that waste incineration fails to meet these criteria and this technology should be excluded from the WtE framework.

Incinerators are in effect fossil fuel power plants. They are the most expensive and most polluting way to manage waste or make energy. For every 100 tonnes of waste burned, 25 tonnes becomes toxic ash requiring secure landfilling. All incinerators emit large volumes of greenhouse gases.⁶

As more facts come to light and studies are published, our concerns about this flawed waste management practice are escalating. The ACT has recently banned this type of waste processing.⁷ Europe has realised the error in using incineration practices. The European Commission now classifies waste incineration in the same category as nuclear and coal energy, removing all renewable energy subsidies and funds for this sector. The Commission recommends that member states decommission old incinerators and not build new ones.⁸

¹ <https://engage.vic.gov.au/wastetoenergy>

² <https://www.legislation.vic.gov.au/as-made/statutory-rules/circular-economy-waste-reduction-and-recycling-waste-energy-scheme>

³ <https://iview.abc.net.au/show/war-on-waste>

⁴ <https://www.vic.gov.au/victorias-plan-circular-economy>

⁵ <https://www.perthnow.com.au/local-news/contract-costs-blamed-for-go-slow-on-fogo-in-city-of-south-perth-c-12566133?>

⁶ <https://zerowasteaustralia.org/2022/04/22/climate-and-health-impacts-of-waste-incinerators-are-worse-than-landfill/>

⁷ <https://reneweconomy.com.au/act-set-to-ban-waste-incineration-for-energy-citing-community-concerns-33706/>

⁸ <https://zerowasteurope.eu/2021/05/wte-incineration-no-place-sustainability-agenda/>

We cannot fix one environmental problem by creating another environmental problem for future generations.

Local communities and environmental groups are justifiably worried about the potential for serious impacts on public health and the urban and natural environment. Communities want to be able to manage their resources efficiently within their own region. It is an environmental injustice to impose the toxic pollution from burning municipal waste from metropolitan areas onto regional communities.

Specific feedback

Finding the right balance ~ proposed cap

The Victorian waste-to-energy framework aims to support sustainable and appropriate investment. The government is well aware of the dangers of over reliance on WtE facilities. In 2020, Infrastructure Victoria advised, “*long-term secure feedstock contracts are necessary for waste-to-energy projects to be financially viable, which risks creating perverse incentives to increase waste*” (RIS, p21). As Food Organics Garden Organics (FOGO) processes, product stewardship schemes and other circular economy projects expand there will be reduced residual waste feedstock available for WtE facilities.

The Victorian Government initially committed to a cap of 1 million tonnes per annum (tpa) of ‘permitted’ waste that could be processed in thermal WtE facilities. Then without explanation, the three plants already approved for Maryvale, Laverton and Dandenong totalling 950,000 tpa were reclassified as “existing operators” and excluded from the cap. **The public is still waiting for an explanation for this decision.** It also appears that due to the impending closure of Hampton Park Landfill, a fourth project, South East Metropolitan Advanced Waste Processing, has been given “existing operator” classification.

The rush to approve waste incineration plants across the state raises serious doubts about whether the government is really serious about facilitating its circular economy transition, *Recycling Victoria: A new economy*⁹ or merely seeking an expeditious way to divert waste from landfill.

1. We don’t believe the proposed cap strikes the right balance.
2. We do not support doubling the volume of waste permitted to be heat treated. As none of the existing operators’ projects have advanced past the design stage, we think they should come under the same regulations. One million tonnes is already too much!
3. We call on the government to pause the scheme until some of the “existing operators” have commissioned their plants and there is real evidence by which to judge their efficacy and safety.

Permitting the right WtE technologies

At first glance it sounds attractive to convert waste into energy. However closer scrutiny shows that there are two very different categories: cold and hot technologies.

- Hot (thermal) technologies: burn waste and destroy the resource permanently. They include gasification, pyrolysis, plasma arc and combustion or incineration.
- Cool technologies: treat waste while extracting energy without destroying the resource or creating toxic emissions. They include composting and anaerobic digestion.

We support the implementation of cool technologies. However we have serious concerns about the hot technologies especially incineration. Globally, incineration has failed to deliver on its claims:

- As a waste treatment technology, it is unreliable and produces a secondary waste stream more dangerous than the original
- As an energy production method, it is inefficient and wasteful of resources
- As an economic development tool, it is a catastrophe
- Its environmental problems are still being tallied
- Its serious public health impacts are well documented in the scientific literature¹⁰
- It is profoundly unpopular and undemocratic.¹¹

⁹ <https://www.vic.gov.au/victorias-plan-circular-economy>

¹⁰ <https://onlinelibrary.wiley.com/doi/full/10.1111/1753-6405.12939>

¹¹ <https://www.no-burn.org/wp-content/uploads/Waste-Incineration-A-Dying-Technology.pdf>

While incineration proponents claim the new generation of devices has solved all previous problems, no new furnace design or filtration system is going to alter the fundamental issue ~ **waste disposal removes materials from useful circulation, which further impoverishes the planet.**

As Europe and the US moves beyond this technology, its promoters are now coming to Australia to find customers.

We must learn from the experiences and mistakes of other cities and not repeat them.

4. We call on the government to remove incineration as an acceptable thermal technology in its WtE scheme.
5. We request that thermal waste projects require sizeable buffers and they should not be permitted in IN2Z industrial zones.

WtE business economics & excessive capital costs

The capital investment (CapEx) and operating expense (OpEx) of waste incinerators are eye-wateringly high. A large plant capable of burning 400,000 tpa such as the Kwinana in Perth, or the projects planned for Lara and Wollert will cost around \$700 million to construct.^{12, 13}

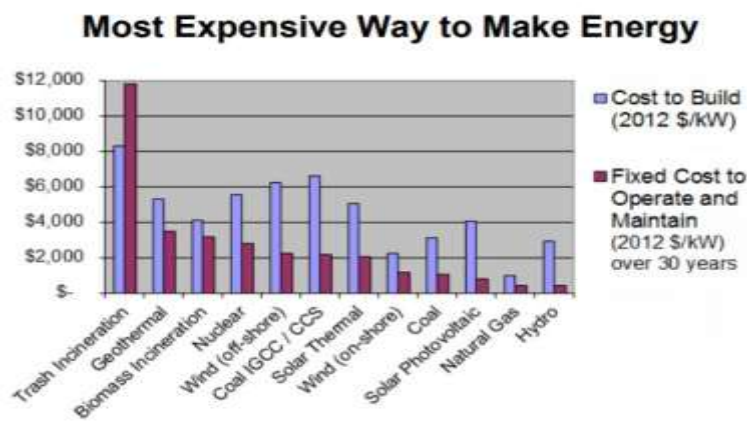
Given the massive capital cost, all waste incinerator proposals should be accompanied by a viable business case, including projects already approved. Local communities facing the threat of a nearby incinerator are entitled to know it won't become a stranded asset. Proponents should be required to lodge a substantial bond in case of default or other misadventure.

The Regulatory Impact Statement (RIS) suggests the WtE gate fee of \$185/tonne, which conveniently equals the sum of the landfill gate fee of \$56/tonne and the waste landfill levy of \$129/tonne. If a 400,000 tpa plant operated as its design maximum it would generate \$74m in revenue. Assuming a profit margin of 30% it would make \$22m. However with a capital cost of \$700m, it would take over 30 years to redeem its investment! A WtE gate fee of \$185/tonne is more than three times the current landfill fee. It is a serious oversight that the RIS did not model the impact on ratepayers of these very high WtE gate fees.

The Lara plant claims it will generate 35mW of electricity, which would equate to a CapEx cost of \$20,000/kW. As furnace temperatures must reach 850°C to prevent dioxins formation and 1100°C to prevent PFAS deposition on land and in waterways, the operational energy requirements are massive.

Given that large scale solar generation typically costs around \$1800/kW, it is more than ten times cheaper to build than a WtE plant. **It is misleading and greenwashing to claim waste incinerators are efficient waste to energy plants.** This has long been the case as the graphic below shows for US electricity generation from 2013.¹⁴ Nor is the energy renewable as it comes from burning plastics which are made from fossil fuels.¹⁵

Overseas studies have shown in reality, WtE facilities export little energy to the grid.



Source: "Updated Capital Cost Estimates for Utility Scale Electricity Generating Plants," Energy Information Administration, April 2013, p.6, Table 1. Full report here: www.eia.gov/forecasts/capitalcost/pdf/updated_capcost.pdf

¹² <https://www.perthnow.com.au/local-news/perth-council-rethinking-waste-to-energy-contract-after-repeated-delays-c-10402312>
¹³ <https://www.watoday.com.au/national/western-australia/what-a-waste-perth-councils-dump-dilemma-as-waste-to-energy-plant-beset-by-delays-20230627-p5djwv.html>
¹⁴ <https://ntn.org.au/10-reasons-why-burning-waste-for-energy-is-a-bad-idea/>
¹⁵ <https://engage.vic.gov.au/download/document/33748>

6. We challenge the byline that the Victorian waste to energy framework is “*supporting sustainable and appropriate investment*”.
7. All WtE proposals should be accompanied by a Business Case, including those projects already approved.
8. DECCA needs to evaluate and justify the economic impact on councils and ratepayers of the high WtE contract costs.

Toxic air pollution and greenhouse gas emissions from incinerators

According to the World Health Organization, air pollution is one of the greatest environmental risks to public health. All waste incinerators, regardless of technology, produce pollution. It cannot be eliminated, only mitigated to some extent by extensive air pollution controls and regular maintenance.¹⁶

Waste incinerators produce a range of toxic gases including: Carbon Monoxide, Oxides of Nitrogen (NOx), Ozone, Sulphur Dioxide, Coarse and Fine Particulate Matter (PM10 and PM2.5), Dioxins, Furans and heavy metals. Some of these chemicals have no safe exposure thresholds.

Many of these gases are also classed as greenhouse gases. All signatories to the Kyoto Protocol committed to reduce their greenhouse gas (GHG) emissions by an average of 5.2 per cent on 1990 levels. Six GHGs are targeted including: Carbon dioxide (CO2), Methane (CH4), Nitrous oxide (N2O), Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs) and Sulphur hexafluoride (SF6).

The modelling for the climate impacts of the waste to energy industry have failed to fully account for forecast changes in the carbon intensity of the energy grid and changes in municipal waste composition which will decrease the claimed climate benefits of waste-to-energy. The next 30-40 years, the potential lifespan of an industry that is just emerging now in Victoria, will see dramatic changes in the both the waste management sector and the electricity sector. Without properly grappling with these changes, **the government cannot justify supporting the establishment of an industry which produces high levels of scope 1 greenhouse gas emissions.** As a baseload generator, waste to energy facilities will increasingly displace genuine renewables, instead of the coal fired generators upon which the modelling has been based. This is false carbon accounting and cannot be justified with the current understanding about greenhouse gas emissions and their detrimental impact on the climate.

Health and environmental impacts

The Victorian government and the EPA are given the green light to WtE incinerators with insufficient safeguards and little recognition of the significant community concern. Many people are unaware that they will be impacted by nearby facilities that are adjacent to residential homes, agricultural land and sensitive environmental areas.

While DEECA may consider these concerns fall under the EPA’s purview, we believe they are fundamental to getting the right settings and we don’t believe recent public health studies have been adequately heeded.

A systematic literature review led by Dr P W Tait at ANU found old and new incinerators carry potential health risks including significant associations with some cancers, birth defects, infant deaths and miscarriage. They found ingestion was the dominant exposure pathway and recommended that “*new incinerators should be located away from areas of food production*” and that “*food grown near an incinerator should be avoided.*” **While newer incinerator technologies may reduce exposure, they concluded, “based on a precautionary principle there is insufficient evidence to conclude that any incinerator is safe”.**¹⁷

New evidence has emerged from France, Switzerland and the Netherlands about the performance and pollution impacts of modern waste incinerators operating under EU’s Best Available Technology (BAT) and associated regulatory standards for emissions and discharges.¹⁸ In November last year, the French Health Authority had to issue an alert to millions of residents across 410 municipalities around Paris to not eat eggs from their backyard chooks or produce grown due to high levels of dioxin and other pollutants.¹⁹ This follows similar contamination of eggs in the Netherlands close to a waste incinerator that also operates to the EU BAT standards.^{20, 21}

¹⁶ <https://www.who.int/health-topics/air-pollution#>

¹⁷ <https://onlinelibrary.wiley.com/doi/full/10.1111/1753-6405.12939>

¹⁸ <https://www.toxicowatch.org/copy-of-media-en-1?fbclid=IwAR3vVzcxj1RoAIlSdRofqg4otWotBBCGr7J1jNFnnbcUeixV1pnjHnO98LA>

¹⁹ <https://www.euronews.com/green/2023/11/21/millions-in-france-warned-not-to-eat-eggs-from-backyard-chickens-due-to-forever-chemical-p>

²⁰ <https://ipen.org/projects/waste-incineration-toxics-eggs#>

²¹ <https://www.sciencedirect.com/science/article/pii/S2405665022000166?via%3Dihub>

As more studies are released there is increasing evidence that the EU's best practice technology standard for waste incinerators is still allowing extensive persistent organic pollution to escape into the surrounding environment despite operators' claims they are meeting their EU regulation. If ever there was a time to uphold and apply the Precautionary Principle, it is now.

*The Department of Health has an important role in protecting the health of Victorians from the potential health effects of environmental hazards.*²² **Why then has Victoria embarked upon the establishment of this new waste incineration industry without first conducting a Public Health Risk Assessment to assure our health?**

9. We question why Victoria is the only Australian state that approves large waste incineration projects without requiring an Environmental Effects Statement ~ it should be a mandatory requirement.
10. We call upon the Chief Health Officer (CHO) and the Deputy CHO (Environment) to undertake a study of scientific literature regarding the health impacts of waste incineration and to publish their findings.
11. We urge the government to put a moratorium on incineration projects while it fully investigates the public health risks and the growing evidence regarding the bioaccumulation of toxins in soils, agricultural produce and the environment.

Community support & engagement

We note that many communities across the state (and the country) that are pushing back against the present rush of incineration projects. If the state government is serious about transitioning to a zero waste circular economy, it should not impose huge incinerators on communities that do not want or need them.

The Victorian government seems to be copying NSW's approach. In September 2021, then energy and environment minister, Matt Kean, was more cognisant of the concerns of local communities worried about environmental and air quality impacts. He said, their plan was about "*getting the balance right between supporting investment in NSW, driving a circular economy and reducing carbon emissions while also respecting the concerns of local communities*".²³

At the Waste to Energy Scheme consultation information session held using MS Teams on 17 January 2024, in contrast to industry representatives, community attendees were denied the opportunity to submit questions or use the chat function. This discriminatory approach seems contrary to DEECA's community charter.²⁴

12. We expect the Victorian government to consult more constructively with affected local communities and environmental groups about its WtE policy and regulations.

UN Cleaner Production Principles ~ Pollution Prevention

*"Cleaner production is the conceptual and procedural approach to production that demands that all phases of the life-cycle of a product or process should be addressed with the objective of prevention or minimization of short and long-term risks to humans and the environment. A total societal commitment is required for effecting this comprehensive approach to achieving the goal of sustainable societies." — United Nations Environment Program*²⁵

The four principles of Clean Production are:

1. **The Precautionary Principle:** When an activity raises threats of harm to human health or the environment, precautionary measures should be taken *even if* some cause and effect relationships are not fully established scientifically.
2. **The Preventive Principle:** It is cheaper and more effective to prevent environmental damage than to attempt to manage or cure it.
3. **The Democratic Principle:** Clean Production involves all those affected by industrial activities, including workers, consumers, and communities.
4. **The Holistic Principle:** Society must adopt an integrated approach to sustainable resource use and consumption.

13. We recommend the Victorian government applies the UN Cleaner Production Principles to its WtE scheme.

²² <https://www.health.vic.gov.au/public-health/environmental-health>

²³ <https://reneweconomy.com.au/controversial-incineration-projects-shifted-out-of-sydney-in-waste-to-energy-plan/#>

²⁴ <https://www.deeca.vic.gov.au/communities-and-regions/community-charter>

²⁵ <https://www.unep.org/resources/report/environmental-agreements-and-cleaner-production>

Developing innovative waste/recycling/reuse solutions

Much of Australia's recyclable rubbish was sent overseas until August 2019, when then Prime Minister, Scott Morrison announced a ban on the export of waste plastic, paper, glass and tyres.²⁶ The public agrees that systemic change is needed to cut waste, boost recycling and resource reuse. However the public is looking to the government to develop policies and legislation that will drive investment in genuine reuse and recycling programs and circular economy initiatives.

- A high priority should be given to the development of regional circular economy hubs and modern materials resource recovery facilities (MRRFs). The Greater Geelong region has not had a functioning MRRF for several years following the collapse of SKM. **There are many times more jobs in recycling than disposal.**
 - Barwon Water has been leading with various projects across the G21 region:
 - The Regional Renewable Organics Network will leverage existing water and sewerage infrastructure to reduce the amount of organic waste that going to landfill, create valuable resources for use in agriculture and advanced sustainable materials and at the same time produce renewable energy.²⁷
 - Their Colac RON working with the Australian Lamb Company takes its organic trade waste and converts it into renewable electricity.²⁸
 - They recently won the Water Minister's Climate Innovation Challenge award for its research project into reclaiming cellulosic fibres from wastewater. Surely it would be much easier to recycle cellulose from other waste streams, starting with not allowing it to be incinerated.
 - A US recycling tech company Resynergi is accelerating plastic circularity using a Continuous Microwave Assisted Pyrolysis reactor, which generates clean products with a 68% reduction in carbon dioxide equivalent.²⁹
 - Amazon shareholders are pushing the company to "reduce its plastics footprint by committing to make all packaging curbside recyclable, reusable, or compostable."³⁰
 - In 2022 US Target launched its Target Zero initiative to advance zero waste solutions by signalling for consumers the products and packaging would be designed to be refillable, reusable or compostable; made from recycled content; or made from materials that reduce the use of virgin plastic. They recognise that this will require industry-wide collaboration to create change at scale; materials innovation to reduce plastic waste; improvements to recycling infrastructure and access; and the availability of affordable recycled content.³¹
14. We urge the government to use its powers to drive investment in genuine reuse and zero waste programs and circular economy initiatives.
15. We support Boomerang Alliance's call for comprehensive product stewardship schemes that require industries to pay for collection and recycling programs for their products.

Tackling the plastics problem

Tackling plastics usage is the really big challenge ~ fundamental to achieving a circular economy.

The collapse of the REDcycle soft plastics recycling scheme has left the public with no option but to put their packaging waste on their red-lidded bin. Some people are annoyed that recycling labels are still telling them to recycle the packaging via REDcycle. Consumers want action on soft plastics especially packaging.

In June 2023, Australia's environment ministers pledge to work together to achieve a Nature Positive Australia to leave our environment better off for our kids and grandkids. Environment Minister Tanya Plibersek said that despite the collapse of a major soft plastics recycling scheme, the federal government has set a target to recycle or reuse 100 per cent of plastic waste by 2040 and end plastic pollution. Commonwealth, along with the states, also promised to reform packaging regulation by 2025 and to create a better circular economy by 2030.³²

²⁶ <https://www.theguardian.com/environment/2023/jun/09/australian-governments-impose-mandatory-packaging-rules-on-industry-to-cut-waste>

²⁷ <https://www.yoursay.barwonwater.vic.gov.au/rron>

²⁸ <https://www.barwonwater.vic.gov.au/about-us/major-projects/renewable-organics-networks>

²⁹ <https://www.esgdrive.com/news/resynergi-secures-capital-to-accelerate-plastic-recycling/704630/>

³⁰ <https://www.asyousow.org/resolutions/2023/12/15-amazon-sustainable-packaging-policies-plastics>

³¹ <https://www.esgdrive.com/news/target-sustainability-report-plastics-reduction-net-zero/696051/>

³² <https://www.dceew.gov.au/sites/default/files/documents/emm-communicue-09-june-2023.pdf>

THE PLASTICS PROBLEM



Source: Dept of Agriculture, Water and the Environment - National Plastics Plan 2021³³

16. We call on the Victorian and federal governments to drive packaging reforms and positive change in order to achieve their targets.

In 2016, a ground breaking report from the World Economic Forum, Ellen MacArthur Foundation and McKinsey & Company, titled *The New Plastics Economy: Rethinking the future of plastics* was published. The report found “applying circular economy principles to global plastic packaging flows could transform the plastics economy and drastically reduce negative externalities”. **The overarching vision of the New Plastics Economy is that plastics never become waste; rather, they re-enter the economy as valuable technical or biological nutrients.**³⁴

- Create an effective after-use plastics economy
 - Radically increase the economics, quality and uptake of recycling.
 - Scale up the adoption of reusable packaging
 - Scale up the adoption of industrially compostable plastic packaging for targeted applications
- Drastically reduce the leakage of plastics into natural systems and other negative externalities
 - Improve after-use collection, storage and reprocessing infrastructure in high-leakage countries
 - Increase the economic attractiveness of keeping materials in the system environmental impact of plastic packaging leakage
- Decouple plastics from fossil feedstocks

The externalities related to the use of plastics and plastic packaging are concentrated in three areas:

- degradation of natural systems as a result of leakage, especially in the ocean;
- greenhouse gas emissions resulting from production and after-use incineration; and
- health and environmental impacts from substances of concern.

17. We urge the Victorian government to boldly tackle the plastics problem and embrace the vision for a New Plastics Economy.

An extended producer responsibility scheme would deliver better outcomes than the current WtE scheme. In 2022, California took a bold step to address plastic pollution by enacting the Plastic Pollution Prevention and Packaging Producer Responsibility Act (Senate Bill (SB) 54), which dramatically overhauls how single-use packaging and single-use

³³ <https://www.agriculture.gov.au/sites/default/files/documents/national-plastics-plan-2021.pdf>

³⁴ <https://www.weforum.org/publications/the-new-plastics-economy-rethinking-the-future-of-plastics/>

plastic foodware will be offered for sale, sold, distributed, and imported in the state, and tackles plastic pollution at the source. EPR systems hold producers financially accountable for the cost of managing their packaging and products in the waste stream, which incentivises them to redesign their packaging and products to use less material and be more environmentally conscious.³⁵

18. We encourage the government to establish an extended producer responsibility scheme ASAP.

Summary of our views & recommendations

Below is a full list of our views and recommendations:

1. We don't believe any of the three proposed cap limits strike the right balance.
2. We do not support doubling the volume of waste permitted to be heat treated. As none of the existing operators' projects have advanced past the design stage, we think they should come under the same regulations. One million tonnes is already too much.
3. We call on the government to pause the scheme until some of the existing operators have commissioned their plants and there is real evidence by which to judge their efficacy and safety.
4. We call on the government to remove incineration as an acceptable thermal technology in its WtE scheme.
5. We request that thermal waste projects require sizeable buffers and they should not be permitted in IN2Z industrial zones.
6. We challenge the byline that the Victorian waste to energy framework is "*supporting sustainable and appropriate investment*".
7. DEECA needs to evaluate the impact on councils and ratepayers of the high WtE contract costs.
8. Local communities facing the threat of a nearby incinerator are entitled to know it won't become a stranded asset. Proponents should share a basic version of their business case and the government should require a bond in case of default.
9. We continue to question why Victoria is the only state that approves large incineration projects without requiring an Environmental Effects Statement.
10. We call upon the Chief Health Officer (CHO) and the Deputy CHO (Environment) to undertake a study of scientific literature regarding the health impacts of waste incineration and to publish their findings.
11. We urge the government to put a moratorium on incineration projects while it fully investigates the public health risks and the growing evidence regarding the bioaccumulation of toxins in soils, agricultural produce and the environment.
12. We expect the Victorian government to consult more constructively with affected local communities and environmental groups about its WtE policy and regulations.
13. We recommend the Victorian government applies the UN Cleaner Production Principles to its WtE scheme.
14. We urge the government to use its powers to drive investment in genuine reuse and zero waste programs and circular economy initiatives.
15. We support Boomerang Alliance's call for comprehensive product stewardship schemes that require industries to pay for collection and recycling programs for their products.
16. We call on the Victorian and federal governments to drive packaging reforms and positive change in order to achieve their targets.
17. We urge the Victorian government to boldly tackle the plastics problem and embrace the vision for a New Plastics Economy.
18. We encourage the government to establish an extended producer responsibility scheme ASAP.

Final comments

"The significant problems we face cannot be solved at the same level of thinking we were at when we created them." Albert Einstein

Australia's waste management system is at a crucial crossroad. How all levels of governments respond will determine whether the transition to a circular economy becomes a reality or it is a mere pipe dream.

³⁵ https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220SB54

Please contact Vicki Perrett on m: 0425 802 116 or email vickip3223@gmail.com to discuss the matters raised by the undersigned community members in this joint submission.

Sincerely,

- Vicki Perrett - 3223 resident, President of [Bellarine Catchment Network](#), past President & Life Member of [Geelong Sustainability](#), past Vice President of [RICE \(Regional Innovation for a Circular Economy\) Inc](#)
 - Charles Street - 3212 resident, convenor of [Say No to Lara Incinerator action group](#)
 - Mik Aidt - 3219 resident, Director on behalf of [Centre for Climate Safety](#)
 - Jacqueline Bennett - 3220 resident, on behalf of [Humans in Geelong Inc.](#)
 - Margot Busch - 3226 resident, President on behalf of [Ocean Grove Coastcare](#)
 - Jan Calby - 3216 resident, President on behalf of [Geelong Environment Council](#)
 - John Englart - 3060 resident, Convenor of [Climate Action Merri-bek](#), coordinator [Sustainable Fawkner](#)
 - Laura Grufas - [AP4CA Geelong - Bellarine - Surf Coast Parents for Climate](#)
 - Robert Patterson - 3331 resident, Convenor on behalf of [A Different Approach Community](#)
 - Lizette Salmon - 3690 resident, on behalf of [Wodonga Albury Towards Climate Health \(WATCH\)](#)
-
- Jackie & John Bath - 3212 residents, members of Say No to Lara Incinerator action group
 - Hazel Boyle - 3212 resident, member of Say No to Lara Incinerator action group
 - James & Jane Compston - 3212 residents, members of Say No to Lara Incinerator action group
 - Lorena Cook - 3212 resident, member of Say No to Lara Incinerator action group
 - Les Dew - 3250 resident, member of Say No to Lara Incinerator action group
 - Ryan Dew & family - 3212 residents, member of Say No to Lara Incinerator action group
 - Annie Duncan - 3212 resident, member of Say No to Lara Incinerator action group
 - Wilma & Laurie King - 3212 residents, members of Say No to Lara Incinerator action group
 - Neve, Nick & Miriam Lovadina - 3212 residents, members of Say No to Lara Incinerator action group
 - Grace Martin - 3212 resident, member of Say No to Lara Incinerator action group
 - Janet Street - 3212 resident, member of Say No to Lara Incinerator action group
 - Melanie Szocs - 3212 resident, member of Say No to Lara Incinerator action group
-
- Abhijith Anand - 3754 resident
 - Alan Barlee - 3219 resident, member of Centre for Climate Safety
 - Karen Bowley - 3747 resident, member of WATCH
 - Sarah Brown & Andrew Barrett - 3219 residents, members of Geelong Sustainability
 - Karen Campbell - 3226 resident, member of several sustainability groups
 - Janet Campbell - 3223 resident, member of several sustainability/environmental groups
 - Jenny Davies - 3690 resident, member of WATCH
 - Dr John Iser - 3226 resident, member of many sustainability and environmental groups
 - Finy Francis - 3754 resident
 - Robin Gardner - 3222 resident, member of several sustainability/environmental groups
 - Bruce Key - 3690 resident, member of WATCH
 - Louis de Koker - 3216 resident, member of several sustainability/environmental groups
 - Jenny Knox & Malcolm Fisher - 3223 residents, member of several sustainability/environmental groups
 - Katherine Lawford - 3064 resident, member of several sustainability groups
 - Jeanne Nel - 3216 resident, member of several sustainability/environmental groups
 - Rosemary Nugent OAM - 3218 resident, member of several sustainability/environmental groups
 - Graeme O'Leary - 3223 resident, member of several environmental groups
 - John Pearce - 3223 resident, member of several sustainability/environmental groups