



Emer Campbell
Director | High-risk and Hazardous Waste
Environment and Climate Change
Department of Environment, Land, Water and Planning

Via email;

VICTORIAN WASTE TO ENERGY CAP

The Victorian Waste Management Association (VWMA) is a not-for-profit association representing Victorian waste recycling businesses. The VWMA operates as a subsidiary of the Victorian Transport Association. The VWMA has 120 business members, ranging from small, family owned and operated companies to multinational corporations. The VWMA members;

- Are waste collection specialists, representing more than 5,000 waste trucks on Victorian roads.
- Include large waste management providers with turnovers in excess of \$100 million each in Victoria.
- Have a total member turnover in excess of \$2 billion.
- Commit to the high standards in regard to protecting Victorian communities, workers and the environment.

We write to you to formalise our concerns regarding Victoria's waste to energy cap. We note the following concerns;

1. The purpose of the waste to energy cap is to ensure material that could be recycled is not sent to energy recovery. However, regulatory oversight for the diversion of valuable resources from energy to recycling is unnecessary, as recycling is an improved environmental and economic outcome. In other words, businesses will not burn for energy a valuable material they could sell.
2. Should the cap be reached - we are concerned it may act as a landfill mandate. For example, in the case of contaminated organics, these materials cannot be sent to land application. Therefore, the only two remaining treatment options are energy recovery and landfill. As a biofuel, contaminated organics in energy recovery do not contribute to climate change. However, should the cap be reached it can mandate these materials to landfill. This would also be the case for all materials suitable only for energy or landfill.
3. Material may flow from interstate to be processed for recycling in Victoria, particularly Tasmania, as Victorian provides important industrial services to our southern neighbour. Undertaking economic activity on behalf of other States is desirable. Therefore, creating a waste to energy cap based on the waste generation of Victoria is inappropriate.

Therefore, VWMA members request the waste to energy cap be revoked as part of *Recycling Victoria*. Instead, in order to stimulate recycling the VWMA recommends the State Government pursue programs to reduce contamination. These include;

- Expanding the upcoming Victorian Container Deposit Scheme to include wine and spirit bottles, and increasing the deposit to 20 cents.
- Mandating contamination reduction education programs as part of local government collection contracts.
- Supporting local government to rollout the implementation of glass recovery services for household and food and garden organics collection (FOGO).

Sincerely,

Alex Serpo

Executive Officer

Victorian Waste Management Association – www.vwma.com.au

Alex@vta.com.au

Level 1, Mirrat House, 46 Kooringa Way, Port Melbourne, 3207
PO Box 5, South Melbourne, 3205
ABN: 95 922 065 177