



Dear Minister,

I wish to bring to your urgent attention the disaster that is unfolding at a state level in relation to waste management.

As states are responsible for waste management and while there is no nationally harmonised waste management framework to guide them, the waste to energy incineration industry is exploiting this situation to their advantage. Sadly, this is at the expense of our climate, environment, health and the best interests of state government economies, a Circular Economy and a sustainable, safe and effective waste management system for our citizens.

Waste management is an essential service. It is also a key element of our interconnected material production systems with opportunities to address climate change, pollution impacts, resource reduction and jobs creation, critical issues contained in a range of international conventions to which Australia is a signatory.

[Waste to energy incineration threatens all of this.](#)

Right now, Victoria and NSW especially, face the threat of waste incineration projects that are directly undermining safer, more effective and sustainable waste management outcomes. State governments are driving this with a range of policies that incentivise waste disposal via incineration at the expense of cheaper, cleaner and more effective alternatives. Some have gone so far as to legislate an anti-competitive, industry bias for waste incineration into their waste and circular economy acts. (i.e. Victorian Southeast metro regional council and Recycling Victoria)

Scandalously, industry propaganda is misleading the public, local governments and state governments with claims that waste incineration emits clean air, inert dusts and has no adverse impacts on human health or the environment. Worse still, state governments are repeating these falsehoods in government publications.

For example, the NSW Department of Planning has likened waste incinerators to leaf blowers.

The truth is that waste to energy incineration emits a range of persistent organic pollutants (POPs) the subject of at least three international conventions. The Basel, Stockholm and Minamata conventions classify this industry as being in the top

industrial pollution sources for Mercury, Dioxin and hazardous waste. The [evidence](#) of widespread contamination of POP's in Europe found close to incinerator plants is compelling and cannot be ignored. [12 million people in France](#) have been prohibited from eating their backyard produce as a result of the dioxin contamination caused by their best practice EU standard incinerator. These same standards, as claimed by the NSW Chief Scientific Engineer, are used to justify the previous liberal government's introduction of incinerators into NSW. Yet the NSW state government has acknowledged this pollution threat to human health, prohibiting their establishment in the Sydney CBD but has legislated to permit their operations in regions where food is grown, and key drinking water sources are located. Indeed, the NSW Chief Scientific Engineers report, despite claims, [has not proved](#) that NSW incineration standards will meet international best practice. Indeed, no standards have been applied for PFAS, microplastics or brominated dioxins, all of which are known to be emitted from waste incinerators.

Right now, the Victorian government is expanding the waste burning cap from 2 million tonnes per annum to 3 million tonnes per annum (nearly the entire volume of MSW Vic generates), while at the same time enabling waste management projects that will subvert most of the state's Municipal Solid Waste (MSW) from FOGO systems (food and organic waste collection), recycling and reuse systems, towards waste incineration. Diverting unsorted MSW directly to disposal outcomes is the opposite of a Circular Economy, destroys valuable resources, undermining better waste outcomes and jobs.

The Federal Labor Government has progressed and promoted a solid and commendable Circular Economy agenda for Australia, where resources are preserved, and innovative circular industries can drive the "Made in Australia" agenda that we so desperately need. Waste incineration undermines all this. Indeed, it was the short sighted, fossil fuelled agenda of the previous federal Liberal government. That is why it is so disheartening to see state Labor governments roll out this agenda now.

I urge you to intervene before this train wreck hits the inevitable wall of financial ruin, community distrust and outrage, climate and pollution disasters that as we know are ultimately carried by the health sector and our environment.

The ACT took the lead by banning waste incineration several years ago. As demonstrated, this has led to more sustainable and effective waste technologies and systems. Conversely, WA's two incinerators are still not operational after 15 years, with the Rockingham facility now in receivership and debt of \$740 million.

[Our organisation](#) has been working with international zero waste, toxics and environmental justice experts for more than 20 years. We have subsequently produced a range of reports demonstrating that [waste incineration is driving the triple planetary crisis](#) and is not the best waste management strategy for [Australia's residual waste](#). This is research, that Australian authorities should have undertaken prior to introducing this

dangerous industrial pollution threat into Australia but instead has simply opened the door to what the [UN Special Rapporteur on human rights, toxics and hazardous waste](#) recently described when visiting Australia in 2023 as – “*the end of the line for the fossil fuel industry.*”

Finally, I would welcome the opportunity to support the federal government to develop a nationally harmonised waste management policy that supports a Circular Economy and additionally provide advice and support for [non-combustion technologies](#) which are desperately needed in Australia for the increasing volumes of hazardous waste we generate (largely from non-recyclable plastics) and the huge volumes generated by Australia’s mining and raw materials extraction industries. Its time to stop kicking this can down the road and establish proven, safe and more effective waste solutions. This would be a profoundly worthy endeavour for the Australian government that would place Australia as a real leader in clean renewable energy and a Circular Economy supported by a sustainable waste management system, leapfrogging ahead of the mistakes made in northern Europe and the US, which they are paying dearly for now. It’s a win for our climate, environment, health, jobs, economy and our standing as a caring, international leader at a time when it is so desperately needed.

I look forward to your earliest response,

Yours sincerely,

Ms Jane Bremmer

Chair

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