



11th April 2025

Dear Rachel and Ministers,

I am deeply dissatisfied with your reply to my correspondence (MC25-003650)

Indeed, it is insulting. Not only to myself but to the many communities all over Australia who are facing the threat of waste incinerators in their communities right now.

I raised serious, referenced issues of concern related to public health impacts, environmental pollution impacts, climate pollution impacts, agricultural produce and trade impacts and human rights impacts inherently associated with waste to energy incineration.

Your reply has not addressed any of these concerns. Your deference of my correspondence directly to your own department demonstrates to me that you do not have a clear understanding of these issues and seemingly do not care.

The Departments correspondence demonstrates the contradictory nature of federal and state policy and legislation in relation to waste management and the Circular Economy.

The action plan established a waste management hierarchy to guide decision-making.

This hierarchy places energy recovery above *treatment* and *disposal*, however the view that waste to energy incineration is not disposal is a very [contested](#) concept given that waste to energy incineration emits twice the climate pollution of gas (per unit of energy). Europe is considering removing the R1 status of waste to energy incinerators right now because of this. It seems to be completely counterproductive to compare waste to energy incineration with fossil fuels or gas, when our energy system is set for decarbonisation, making this classification and placement in the waste hierarchy – above disposal - even more nonsensical. The implications of mischaracterising the benefits of waste to energy incineration's relatively miniscule energy contribution, is having widespread adverse implications for the Australian environment, public health and energy market. Simply put, a waste to energy incinerator that relies on plastic waste – as they all do – will never be anything other than a fossil fuel-based energy industry. Indeed, this is why the [fossil fuel](#) industry is [pushing](#) them into Australia.

Under the hierarchy, waste avoidance is the priority, followed by recycling and then energy recovery where there are no higher value uses available.

While state governments make huge financial investments in waste incineration infrastructure, the same investment for waste avoidance, recycling, reuse and composting infrastructure is not there. States are simply not upholding this hierarchy. State governments still rely on waste *disposal* systems which include mixed waste collection systems which generate significant volumes of residual waste (i.e. compaction trucks and Material Recovery Facilities). Recently in Victoria a largescale *waste transfer station* (residual waste compacted into bales and transferred to the Maryvale incinerator) advertised as a resource recovery facility (clearly not) was rejected by the EPA. While this decision is supported, it is unclear how the Victorian EPA could reject a waste transfer station on the grounds of human health and environmental impacts, but not a 460 000 tpa (Lara) or 300 000tpa (Wollert) waste incinerator. Both of these projects are close to residential areas, including schools and childcare centres.

There are clearly *higher uses available* for many materials in the residual waste stream given that public places predominantly only provide for residual waste bins. Significant volumes of recyclable metals, paper/cardboard and plastics are found in the residual waste stream, yet no State currently provides any further sorting or separation processes specifically for residual waste. There is clearly a direct correlation between the generation and volumes of residual waste that States generate and the waste management systems they employ. If you do not provide any recycling or composting bins, all waste goes to the residual waste pile, and this is the case for most public places, events, businesses and industries. Nordic countries that have relied on waste incineration are now looking to invest in [residual waste pre-sorting](#) to further reduce the loss of value in their residual waste streams going to incinerators.

Further, our organisation [investigated](#) the best options for Australia's residual waste management - something that state governments do not appear to have done prior to investing in waste incineration technologies - and found that incineration was the worst outcome for climate, air quality and health costs. Landfill with full pre-treatment was the best. This is a Zero Waste model that ensures that all valuable materials in the residual waste stream are removed (metals, paper/cardboard, plastics) and that organics are stabilised (composted), and that the remaining wastes are sterilised and stabilised to eliminate the potential for leaching chemicals into landfill or the environment. Unlike waste incineration which emits dangerous persistent organic pollutants directly to the air and simply reduces residual waste to a quarter of its volume as a highly toxic and hazardous waste ash – requiring secure landfill as the most expensive and polluting technology option. Waste incineration directly subverts the waste hierarchy, incentivises residual waste production and destroys finite resources, unlike landfill with full pre-treatment. It is a curious phenomenon that in a vast country

like Australia, that we have a “landfill crisis”. Much smaller countries with higher populations do not seem to have the same crisis. Could it be that this crisis is being manufactured by the waste incineration industry who appear to be the direct beneficiaries?

Once waste is converted to energy it is lost from the circular economy. Waste to energy can play a part in Australia’s long-term waste solution where it is consistent with the waste hierarchy and does not divert valuable materials away from recycling.

While the federal government may acknowledge that ‘*once waste is converted to energy it is lost from the Circular Economy*’ – it is clear we are really talking about incineration because waste to energy that involves Anaerobic Digestion (the only other EfW technology in Australia) retains the carbon in our biosphere, so it is not lost. Indeed, there are 10 waste to energy incinerators proposed or under development just in WA, NSW and Victoria alone, compared to very few other technologies. Indeed, it is the threat of waste incineration that is causing widespread public outrage not Anaerobic Digestion plants.

Yet the NSW and Victorian government Circular Economy policies and legislation, enshrine waste to energy incineration as part of a CE and use this to justify the six projects in Victoria and the two projects in NSW, culminating in nearly 2 million tonnes of waste burning. This alone will emit nearly 3 million tonnes per annum of climate pollution. How do you explain or defend this clear contradiction between federal and state policy? How can the federal government promote a Circular Economy while states are burning the very finite resources which are needed for a Circular Economy via their own Circular Economy policies and legislation? Does this contradiction demonstrate the need for national leadership on waste management? Wouldn’t a nationally harmonised waste management framework that placed a moratorium on waste incineration be a more effective way for Australia to achieve a Circular Economy?

The clear environmental, public health and trade threats that waste incineration poses deserves national recognition and protection. The absence of a robust, evidence-based legislated framework on waste management that excludes waste incineration, which protects Australians regardless of where they live, leaves these important issues, our human rights, our children’s future, the protection of cultural heritage, food production and biodiversity, to state and local governments where vested interests are thriving and dominating at their expense.

While I am fully aware of the existence and roles of state industrial regulators, there is a very good reason we have National Environmental Protection Measures (NEPMs).

PFAS is already a major contamination issue across Australia. Waste to energy incinerators emit PFAS into the air and ash. Microplastics are already a global pollution

crisis and brominated dioxins (persistent organic pollutants) are not captured by the Air Pollution Control units of waste incinerators and have no regulatory standards.

Finally, I would like to draw your attention to the [growing evidence of contamination](#) around best practice waste incinerators in Europe. [Biomonitoring is revealing](#) widespread persistent organic pollution. It would be reckless and indefensible to ignore this evidence and prevent a similar contamination threat in Australia.

These known pollution threats cannot be ignored and swept under the carpet just to enable a competitive advantage for a highly controversial waste disposal technology at a state level. Australian's need strong leadership on this issue to defend our health and environment. Your correspondence to me suggests that you are not interested, and I therefore urge you in the strongest possible terms to reconsider.

Please introduce an immediate moratorium on this industry and instigate a full independent inquiry so as to create a level playing field for public health protection, our agricultural sector and other Australian businesses and industries, local, state and federal regulators and agencies who are clearly struggling under the weight of this industry's propaganda to defend themselves and our best interests.

I look forward to your reply,

Yours sincerely,

Jane Bremmer

Chair

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