

Engage Victoria  
Victorian Government  
1 Treasury Place  
East Melbourne VIC 3002

31 March 2025

To whom it may concern,

**Re: Continued Opposition to Waste-to-Energy Regulations and Cap Licensing Framework Expansion**

We are writing on behalf of Geelong Sustainability to reaffirm our strong opposition to the proposed waste-to-energy (WtE) regulations, particularly regarding the ongoing increase in the waste-to-energy cap. We initially opposed the project when the cap was set at one million tonnes, and we were deeply concerned when it was increased to two million tonnes. Now, with the proposal to increase the cap further to 2.5 million tonnes, our concerns have only intensified.

[Geelong Sustainability](https://www.geelongsustainability.org.au) is a multi-award-winning not-for-profit community organisation and registered charity that supports residents of Geelong and surrounding regions to live more sustainably and address the climate emergency. Since our establishment in 2007, we have been at the forefront of environmental advocacy, community education, and sustainability initiatives, with extensive networks in community, government, and business throughout Geelong and the Barwon region.

From the outset, we have raised significant concerns about the environmental and health risks associated with waste-to-energy incineration, which remain as relevant today as when we first opposed this project. Waste incineration produces more carbon dioxide per megawatt-hour than coal-fired power stations, undermining efforts to mitigate climate change and transition to a net-zero emission future. The burning of waste releases harmful pollutants, which pose severe health risks to nearby communities and workers. Furthermore, instead of supporting waste reduction, reuse, and effective recycling, waste-to-energy facilities encourage ongoing waste production, contradicting the principles of a circular economy.

The initial cap of one million tonnes was already too high, and the proposed increase from two million tonnes to 2.5 million tonnes exacerbates our original concerns and raises new, urgent issues. The continuous expansion of waste-to-energy infrastructure, despite community opposition, signals a disregard for public concern and input. Furthermore, an increase in waste incineration means more emissions, more toxic byproducts, and greater risk to the health and well-being of nearby communities.

Given these persistent and growing concerns, we urge the Victorian Government to halt the proposed increase to 2.5 million tonnes and reassess the environmental and social impacts of waste-to-energy projects in Victoria. Instead of relying on waste incineration, we ask the Victorian Government to prioritise alternative waste management strategies such as improving recycling infrastructure, strengthening organics recovery systems, and implementing policies to reduce waste at the source so the management of the issue is not left to households and communities.

We appreciate your attention to this matter and strongly urge you to reconsider this cap expansion. Our communities deserve a waste management strategy that aligns with sustainability principles, action on climate change and prioritises public health and environmental protection.

Yours sincerely,

**David Spear**

Chair

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