
HUME CITY COUNCIL

Submission to The development and expansion of waste-to-energy (WtE) infrastructure in Victoria Parliamentary Inquiry



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Advocating for
a better future





"Council fully supports the need to embrace the circular economy. We cannot continue to fill our landfills with waste. Waste to Energy is one way to help support this approach but in the absence of clear independent messaging from the Government on the environmental and health impacts of this technology we cannot support the development of new facilities so close to our families."

– Mayor of Hume City,
Councillor Carly Moore

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Acknowledgement of Country

Hume City Council recognises the rich Aboriginal heritage within the municipality and acknowledges the Wurundjeri Woi-wurrung, including the existing family members of the Gunung-Willam-Balluk clan, as the Traditional Custodians of this land. Council embraces Aboriginal and Torres Strait Islander living cultures as a vital part of Australia's identity and recognises, celebrates and pays respect to Elders past and present.

Executive summary

Hume City Council holds concerns regarding the proposed thermal waste to energy development in Sunbury. No other known operational or planned facility in Victoria is located as close to residentially zoned land as the HiQ proposal.

This proximity has heightened community opposition, primarily driven by concerns about potential impacts on health and wellbeing and traffic.

These concerns are further exacerbated by the absence of clear, independent and transparent messaging from the Victorian Government regarding the safety and impacts of waste to energy technology, leaving local communities exposed to conflicting narratives between proponents and community advocacy groups.

Council is also concerned about the implementation of the State's waste hierarchy and circular economy policy settings. Inconsistent kerbside diversion rates across Victoria, raise questions about

whether recyclable and organic materials are being adequately separated prior to thermal treatment. Council considers this separation fundamental to ensuring waste to energy is a waste treatment option.

Finally, Council notes shortcomings in the transparency of the waste to energy approvals process. The issuing of cap licences prior to final planning and environmental approvals has contributed to a community perception that approvals are predetermined, limiting trust and confidence in the process.

Council strongly believes that meaningful, government-led community engagement should occur once waste to energy proposals is formally identified, not just subject to Parliamentary inquiries such as this.



Introduction

Hume City Council is pleased to put forward its submission to the Legislative Council Economy and Infrastructure Committee's inquiry into The development and expansion of waste-to-energy (WtE) infrastructure in Victoria.

Council understands the important role that the circular economy plays in ensuring that communities have alternative ways to reduce waste going to landfill and the Victorian Government's ambitious policy directions - Circular Economy (Waste Reduction and Recycling) Act 2021 and the Circular Economy (Waste Reduction and Recycling) (Waste to Energy Scheme) Regulations 2023 aims to drive outcomes under that approach.

One of the Victorian Government's strategic drivers in implementing this policy is through the proposed development of waste to energy facilities – providing new ways of turning waste material into energy and diverting it away from landfill.

Despite the best endeavours of the Government, waste to energy facilities can be contentious as they are relatively new technologies in local communities and without adequate information on the potential impacts, community concerns arise.

Council's submission to this inquiry considers the proposed development within our community – one which we are requesting that the Victorian Government refuse to grant approval for. We do not oppose this type of development in totality but take this position after listening to the community who have raised their concerns around its location, coupled with inadequate clear and transparent messaging from the Victorian Government on its impacts.

We do not take this position lightly but is presented to this inquiry in the best interests of our community.



Recommendations

- 1.** The Victorian Government refuse to grant approval for the development of the proposed HiQ and Wollert thermal waste to energy facilities.
- 2.** The Victorian Government consider all future residential development close to the proposed HiQ development as there is still residential development planned for the future.
- 3.** The Victorian Government mandate that any future waste to energy developments implement minimum buffer zones based on independent, scientific plume and emissions modelling aimed to prevent any harm or impact on residential areas.
- 4.** Should the Victorian Government approve the waste to energy facility in Hume City, then the Victorian Government should expedite and fund the duplication of Sunbury Road from Melbourne Airport to Bulla-Diggers Rest Road.
- 5.** Should the Victorian Government approve the waste to energy facility in Wollert, then the Victorian Government should expedite and fund further upgrades to the Hume Freeway.
- 6.** The Victorian Government to provide clear messaging to communities on the environmental and health impacts of waste to energy.
- 7.** That the Victorian Government mandate stringent conditions on the separation of waste and organics before it is put through the thermal waste to energy process.
- 8.** That community engagement on proposed waste to energy facilities be led by the Victorian Government and occur as soon as any level of Government (Local, State or Federal) is made aware of a potential proposal.
- 9.** That the Victorian Government continue to explore other options for the disposal of waste materials.
- 10.** That any future Waste to Energy framework requires granted licensees to include social investment in the local community, noting the changes in community support from the Visy facility in Coolaroo.

The impact of Waste to Energy projects on residential communities and transport

Proposed locations in proximity to current and proposed residential areas.

The location of proposed waste to energy developments further exacerbates community concern. A community opposed on the grounds that they fear it will impact on people's health and wellbeing are heightened if proposed developments are located close to residential areas.

Two of the proposed thermal waste to energy developments that had cap licenses issued in August 2025 are planned to be in Melbourne's outer north (See Table 1 below).

Table 1 - Cap licences issued¹

Licence holder	Date of issue	Cap amount (tonnes per annum)
Cleanaway Operations Pty Ltd	17 August 2025	760,000
HiQ EFW Victoria Pty Ltd	17 August 2025	750,000
Knox Transfer Station Pty Ltd	17 August 2025	15,000
(location to be confirmed)		
Liquid Power Co Pty Ltd	17 August 2025	50,000
Melbourne Water Corporation	17 August 2025	450,000
Recovered Energy Laverton Pty Ltd	17 August 2025	280,000
Zerogen Holdings Pty Ltd	17 August 2025	45,000
Total		2,350,000

¹Other locations are yet to be confirmed.

²www.vic.gov.au/waste-energy-scheme-operating-licences

The Cleanaway proposal is planned for a neighbouring municipality (City of Whittlesea) whilst the HiQ proposal will be located within Hume City, southeast of the suburb of Sunbury.

That these two sites are accounting for 65% of the total cap amounts issued indicates that there will be significant traffic movements coming in and out of those sites. This leads to more trucks on our roads and will impact on an already congested network and additionally reinforce Council's recommendation for the expedited duplication of Sunbury Road from Melbourne Airport to Bulla-Diggers Rest Road.

Notably the HiQ development is planned in close proximity (800m) to proposed residential areas (as committed to through the Sunbury South and Lancefield Road Precinct Structure Plans) (see Image 1).



The impact of Waste to Energy projects on residential communities and transport (cont'd)

Impact on residential communities

No other known currently operating or planned waste to energy development are planned, in construction or in operation as close to residential areas as is proposed for the HiQ development in Hume City (see Attachments).

Given the proximity of the proposed HiQ development and the concerns raised by the local community, Hume City Council seeks that the Victorian Government refuse to grant approval for the development of the thermal waste to energy facility in Sunbury.

Council requests that the Victorian Government reconsider plans for future residential development planned in proximity to the proposed HiQ development particularly as there are plans for more residential development in the area.

Additionally Council recommends that the Victorian Government mandate that any future waste to energy developments have minimum buffer zones based on independent, scientific plume and emissions modelling aimed to prevent any harm or impact on residential areas.

Impacts on traffic

Should the Victorian Government choose to approve the HiQ waste to energy development against Council's wishes, it is important to note that this will lead to additional traffic movements to and from the proposed site on Sunbury Road.

Sunbury Road carries around 27,000 vehicles daily, far exceeding the safe capacity of a singlelane rural arterial.

For many years, and well prior to the proposed HiQ development, Council has long advocated for the duplication of Sunbury Road (the only direct arterial feeder road to the HiQ site). Sunbury Road is one of only two ways to connect Sunbury with the city of Melbourne and includes a direct connection to the Tullamarine Freeway.

Whilst the Victorian Government has duplicated Sunbury Road from Bulla-Diggers Rest Road to Sunbury, the section between Melbourne Airport and Bulla-Diggers Rest Road remains singlelane, creating a new and serious bottleneck for residents travelling along Sunbury Road - including for Bulla and Sunbury.

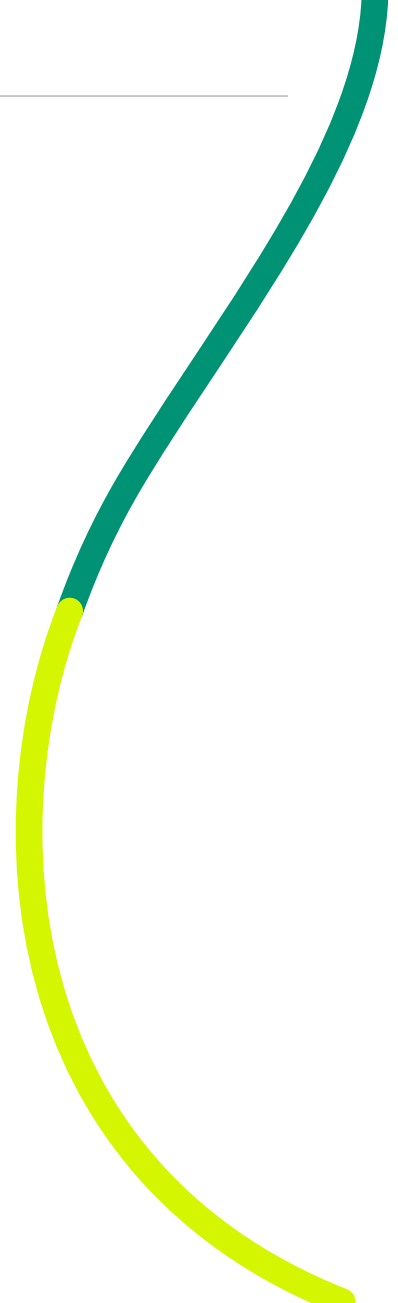
This is leading to frequent congestion, risky overtaking, and limited visibility contributing to ongoing safety incidents and compromises emergency access during crashes or bushfire emergencies, leaving communities isolated.

Should the Victorian Government approve the development of the HiQ waste to energy facility against Council's wishes, it is Council's expectation that the Victorian Government fund and expedite the duplication of Sunbury Road between Melbourne Airport and Bulla-Diggers Rest Road to provide greater certainty for people travelling to and from Sunbury in amongst what is expected to be an increase in trucks coming to and from the proposed site.

Additionally, the proposed development at Wollert is likely to lead to additional traffic on major arterials including the Hume Freeway.

Should the Government approve the Wollert development it is Council's expectation that funding be provided to upgrade the Hume Freeway with additional lanes in each direction.

Ultimately Council believes that any future waste to energy facilities should be located adjacent to existing transport corridors.



The inadequacy of messaging from Victorian Government

There is community concern around waste to energy within Hume City. This is attributed to whether there are any detrimental impacts (health and wellbeing and environmental) to local communities.

The Victorian Government's own messaging on whether waste to energy is safe (see image 2) provides little-to-no surety to local communities that share concerns around the development of new waste to energy facilities.

Image 2 – Victorian Government messaging - is waste to energy safe?

Is waste to energy safe?

The safety of Victorians and our environment is our priority. The Victorian Government has established a robust framework to regulate waste to energy. The Environment Protection Authority Victoria (EPA), planning authorities and Recycling Victoria each have a role to play in ensuring that thermal waste to energy facilities meet best-practice emissions controls, environment protection and local planning requirements, whilst also contributing to circular economy outcomes.

There are some waste to energy facilities already operating in Victoria that are subject to conditions set through planning permits. These facilities must also comply with obligations set under the [Environment Protection Act 2017](#).

³ www.vic.gov.au/waste-energy

In the absence of clear messaging from the Victorian Government on the impacts of waste to energy this can lead to two opposing sides with vastly different messages. This is clearly the case in our community with the proponent (HiQ) and the No Sunbury Waste Incinerator group.

As a result, Council recommends that the Victorian Government create clear transparent messaging that provides independent transparent advice on the impacts of waste to energy developments.



Victorian Government approvals and processes

Waste diversion from landfill

Council understands the current policy approach for waste to energy includes the separation of recycling and organics before it reaches waste to energy plants but is concerned about its implementation.

Rates of Kerbside collection waste diverted from landfill in Victoria is inconsistent right across the state, with some Council's having a diversion rate of 15%, whilst others rate as high as 75%.⁴

Hume City is in the bottom third of all Councils with a diversion rate of just over 40% so Council recommends that any future waste to energy development must include detailed processes for the separation of recycling and organics prior to being subjected to the thermal waste to energy process.

Approvals and community engagement

Council appreciates that the Victorian Government needs to have a transparent approvals process for waste to energy proposals. The wider Hume City community is only aware of that process from Victorian Government after the announcement of the two cap licenses issued in August 2025 (see Annual Caps below).⁵

Community engagement on a development is led by the proponent (in this case HiQ in Hume City) which is indicative of the lack of transparent messaging from the Victorian Government as outlined above.

This followed by the designation of the cap license being issued ahead of the final approval process by the Victorian Government (subject to Planning and Environmental permits), leads local communities to believe that it is a foregone conclusion that a development will take place.

Without this Parliamentary Inquiry, local communities would not be able to participate in any official engagement process to the Victorian Government.

Council recommends that the Victorian Government lead significant community engagement with local communities once a waste to energy development is proposed (to either Local, State or Federal Government) to get an understanding of local community sentiment.

Additionally Council recommends that any future Waste to Energy framework requires granted licensees to include social investment in the local community, noting the changes in community support from the Visy facility in Coolaroo



⁴ www.localgovernment.vic.gov.au/strengthening-councils/performance-reporting

⁵ The sunbury and Bulla communities were aware because of community engagement led by the proponent – HiQ.

Investigate other options

Under Victoria's plan for a circular economy⁶, the Victorian Government is committed to a “cleaner, greener Victoria with less waste and pollution, more jobs and a sustainable and thriving circular economy.”

That the Victorian Government cannot assure Victorians that waste to energy is safe (see page 11), it is important that other safe avenues for the treatment of waste are explored.

Council therefore calls on the Victorian Government to investigate other alternative ways to manage waste in line with Goal 4 in the Recycling Victoria A new economy position paper – Reduce harm from waste and pollution.

⁶ www.vic.gov.au/victorias-plan-circular-economy



Conclusion

This Parliamentary inquiry has provided local communities with an opportunity to have their say on relatively new technologies for our state and our country. In its absence, there was no avenue for the community to do so. With a proposed waste to energy facility planned in our community Council was presented with an opportunity to put forward its thoughts on the matter.

Given the proximity of the proposed HiQ waste to energy facility to existing and future residential areas in our community, the scale of community concern, and the absence of clear assurances regarding health, environmental, and traffic impacts, Hume City Council formally requests that the Victorian Government refuse approval for the HiQ thermal waste to energy facility in Sunbury.

Council further recommends that the Victorian Government establish a mandatory minimum buffer based on scientific data for any future waste to energy facility developments.

Supporting this it is recommended that clear, independent and transparent Government-led communication on the impacts of waste to energy is essential to restoring community confidence and ensuring informed public discourse.

Hume City Council remains committed to advocating for outcomes that protect community health and wellbeing, ensure infrastructure adequacy, and uphold the integrity of Victoria's waste and environmental policy objectives.

Attachments

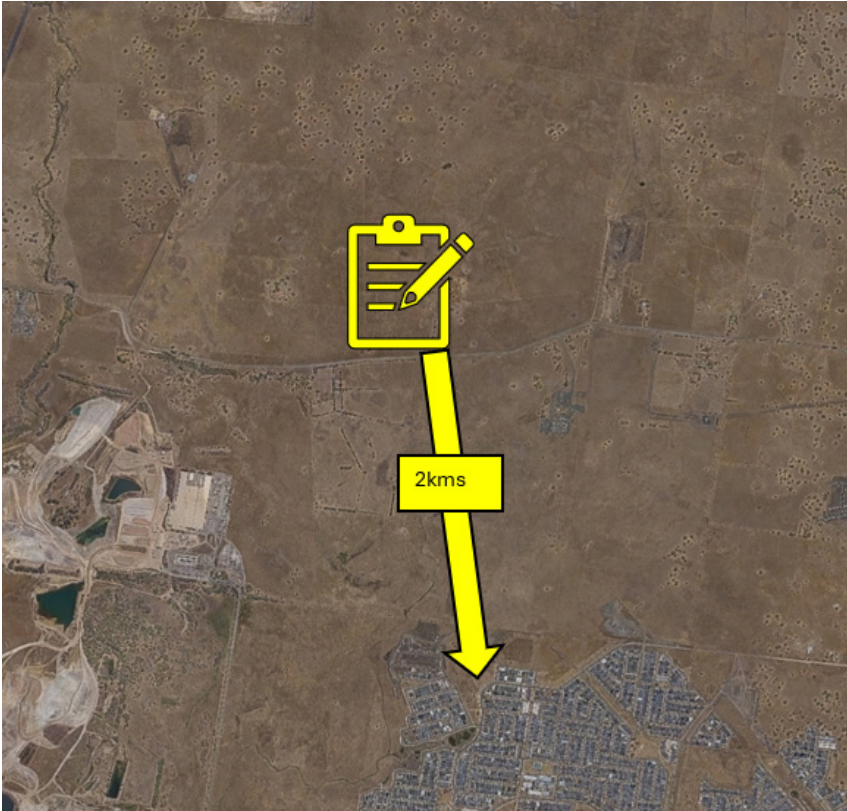
Attachment 1 - Cap licenses issued

Image 2 - HiQ EFW Victoria Pty Ltd - cap license issued



Attachments

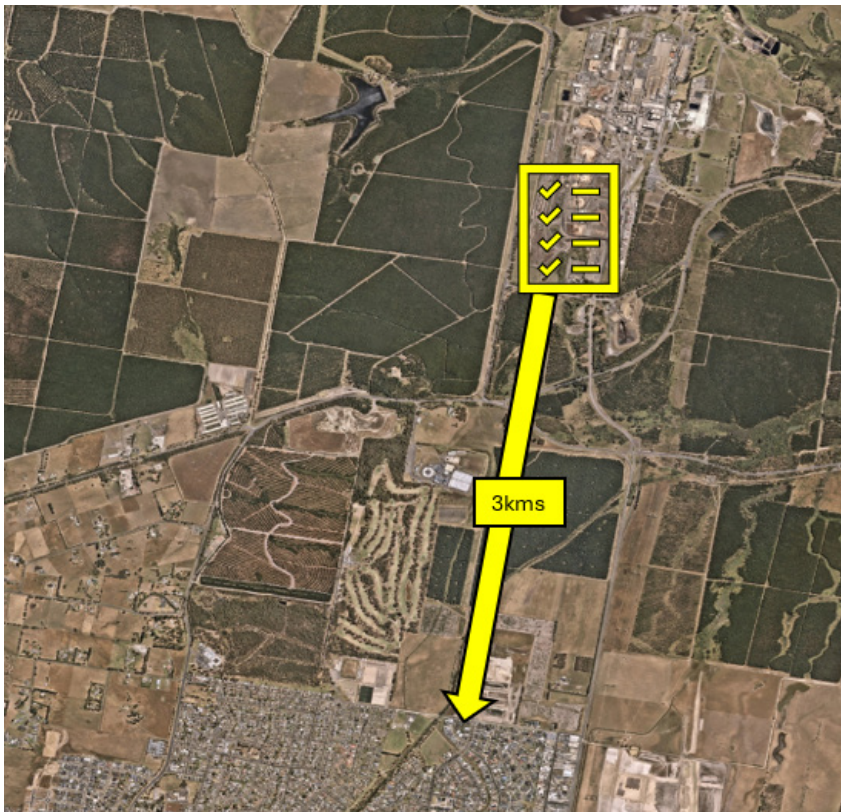
Image 3 - Melbourne Energy and Resource Centre, (Cleanaway Operations), Wollert, Victoria



Attachments

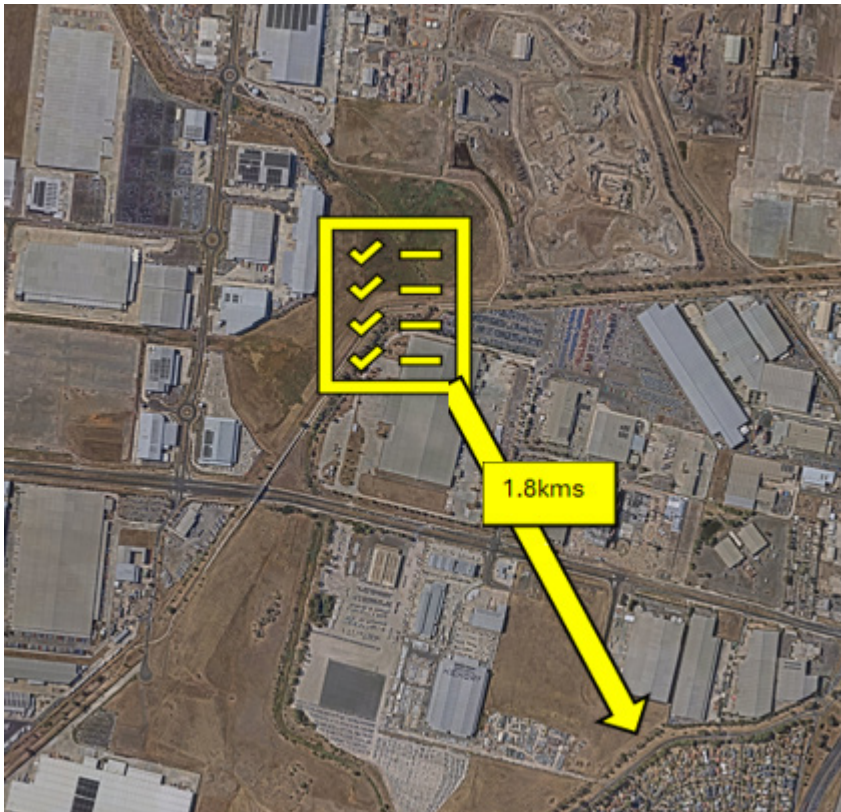
Attachment 2 - Existing operator licenses

Image 4 - Paper Australia Pty Ltd, Maryvale, Victoria



Attachments

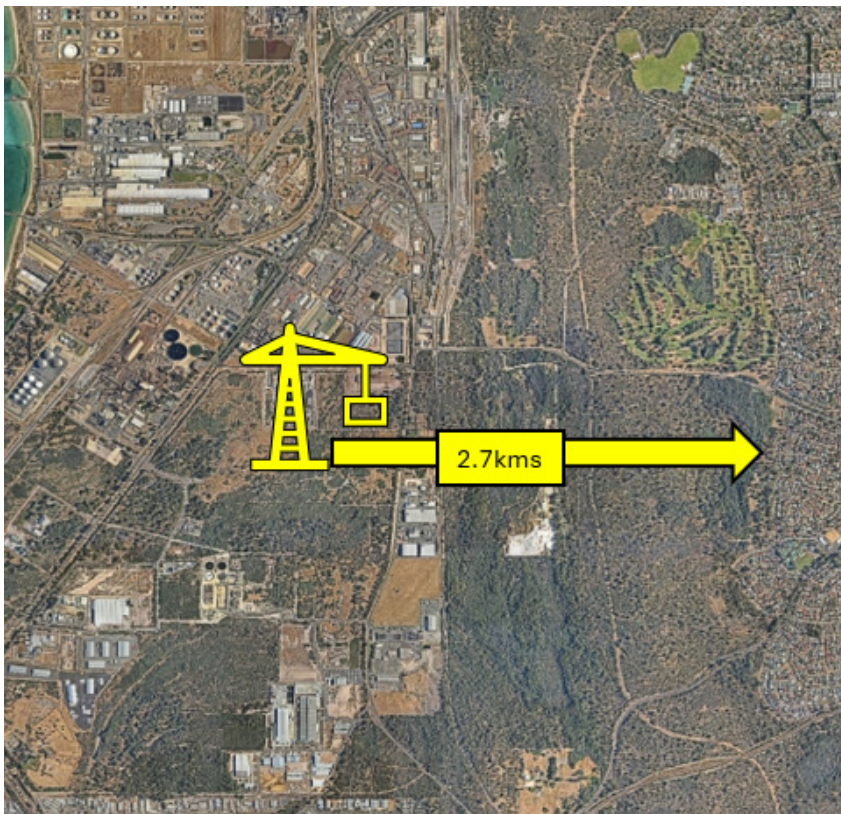
Image 6 - Recovered Energy
Laverton Pty Ltd



Attachments

Attachment 3 - Facilities under construction

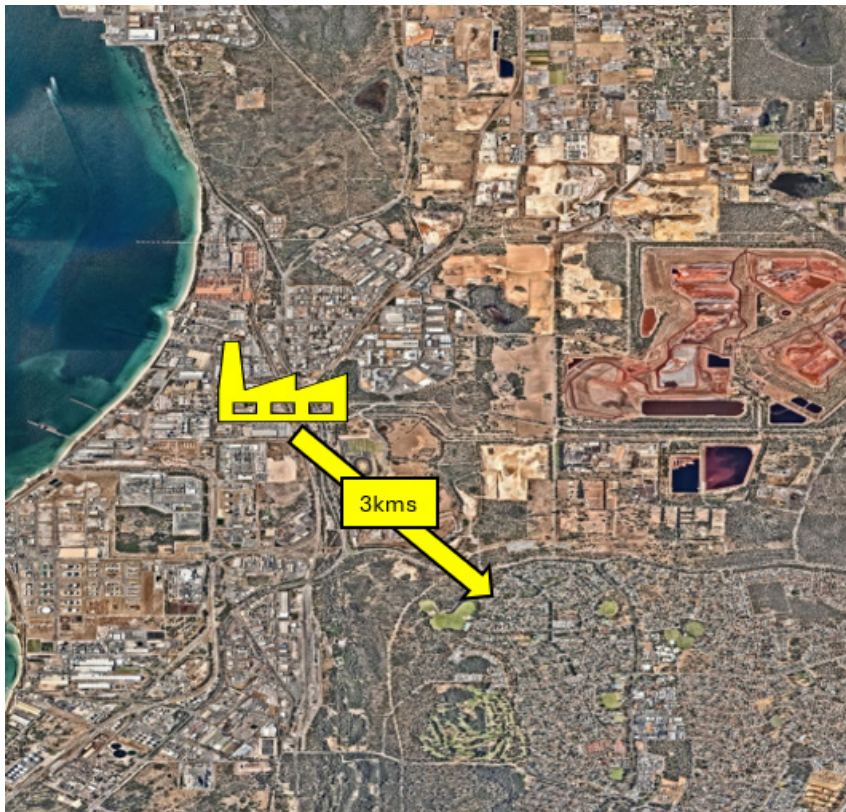
Image 7 - East Rockingham Waste to Energy Plant, East Rockingham, Western Australia (under construction)



Attachments

Attachment 4 - Facility in operation

Image 8 - Kwinana Waste to Energy Plant, Kwinana, Western Australia (in operation)



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For more information, contact our
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