

02 April 2026

Parliament of Victoria
Legislative Council Economy and Infrastructure Committee
Parliament House
Spring Street
EAST MELBOURNE VIC 3002

Submission via online portal

To the Economy and Infrastructure Committee,

Re: The development and expansion of waste-to-energy (WtE) infrastructure in Victoria

The Australian Beverages Council Limited (ABCL) is the leading peak body representing Australia's non-alcoholic beverages industry. For over 75 years, the ABCL has been the only dedicated advocate for this industry, representing approximately 95 per cent of the industry's production volume. Our members range from Australia's largest drinks manufacturers to small and micro beverages companies whose drinks are enjoyed nationally as well as around the world. These beverages include carbonated soft drinks, energy drinks, sports and electrolyte drinks, frozen drinks, bottled and packaged waters, 100 per cent juice and fruit drinks, cordials, iced teas, ready-to-drink coffees, kombuchas, flavoured milk products and flavoured plant milks.

Industry commitment to a circular economy

The ABCL and its members have been leaders in producer responsibility and circularity for decades. We work to demonstrate our commitment through the development, full funding and participation in container deposit schemes (CDS), participation in APCO and the ANZPAC Plastics Pact, as an accredited stakeholder in the United Nations Environment Programme, and through a variety of additional domestic and international forums. Our members also support recycling through local state-of-the-art glass beneficiation facilities, as well as PET recycling facilities including Albury-Wodonga and Altona North, created through beverage, waste, packaging and government co-investment.

Support of the exclusion of Container Deposit Scheme containers in waste to energy

The ABCL supports Victoria's existing prohibition on processing CDS eligible containers in thermal waste to energy facilities. Section 74Q of the *Circular Economy (Waste Reduction and Recycling) Act 2021* clearly establishes that eligible containers are classified as banned waste for the purposes of energy recovery. This approach appropriately recognises that CDS containers are collected through a dedicated recovery system designed to deliver high-value recycling outcomes. Maintaining this prohibition ensures that materials already captured through the CDS continue to be directed to recycling pathways rather than being diverted to energy recovery.

Protecting CDS materials from incineration is critical to maintaining the integrity and performance of the scheme. Energy recovery sits below recycling in the waste hierarchy and should not compete with established recycling streams that are delivering strong recovery

outcomes. Allowing CDS containers to be processed in waste to energy facilities would risk undermining the environmental and economic value of these materials, as well as public confidence in the scheme itself. Retaining this safeguard within Victorian legislation will help ensure that CDS continues to support effective resource recovery and circular economy outcomes.

We thank you for the opportunity to submit to the development and expansion of waste-to-energy (WtE) infrastructure in Victoria. If you have any additional questions, please do not hesitate to contact me via email at shannon@ausbev.org.

Warm regards,

Shannon Doherty-Andall
Sustainability Manager
Australian Beverages Council Limited