

Appendix A:

Submissions and comments

We have consulted with the Department of Energy, Environment and Climate Action, the Environment Protection Authority Victoria, Sustainability Victoria and the Victorian Infrastructure Delivery Authority, and we considered their views when reaching our audit conclusions. As required by the *Audit Act 1994*, we gave a draft copy of this report, or relevant extracts, to those agencies and asked for their submissions and comments.

Responsibility for the accuracy, fairness and balance of those comments rests solely with the relevant agency head.

Responses received

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Sustainability Victoria	A-6
Victorian Infrastructure Delivery Authority	A-8



Department of Energy, Environment
and Climate Action

PO Box 500, East Melbourne,
Victoria 8002 Australia

Andrew Greaves
Auditor-General
Level 31 / 35 Collins Street
MELBOURNE VIC 3000

Dear Auditor-General

Proposed draft report – Recycling resources from waste

Thank you for your invitation to comment on the Victorian Auditor-General's Office's (VAGO) proposed draft report for the performance engagement – Recycling resources from waste, received 26 February 2025.

The Department of Energy, Environment and Climate Action (DEECA) recognises the need to effectively demonstrate progress towards the targets in the Victorian Government's circular economy policy, *Recycling Victoria: A New Economy*.

DEECA welcomes your findings and accepts the recommendations detailed in the report. A proposed action plan for addressing these recommendations is enclosed.

I thank your staff for their work and look forward to a continued productive relationship with your office.

Yours sincerely

John Bradley
Secretary

Encl: DEECA Action plan responding to VAGO's recommendations for Recycling resources from waste.



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Department of Energy, Environment and Climate Action - action plan to address recommendations from VAGO's report: *Recycling resources from waste 2024*

No	Recommendations	Acceptance	Agreed Action	Completion Date
1	<p>Strengthen Victoria's current waste collection and reprocessing system, by identifying opportunities to:</p> <ul style="list-style-type: none"> improve the recovery of high-volume waste streams that currently have a low recovery rate with little or no change since 2020 enable Victoria to have the capacity it needs to meet projected recycling demand for key and emerging waste streams. 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> In part <input type="checkbox"/> In principle	<p>DEECA will conduct research and provide policy advice to the Victorian Government on opportunities to make further progress towards the landfill diversion target, and to support recycling capacity for key and emerging waste streams, by November 2025.</p> <p>DEECA will update the Victorian Recycling Infrastructure Plan by 2027, in accordance with the statutory timeframe, to direct investment towards infrastructure capacity to meet projected recycling demand.</p> <p>To strengthen Victoria's current waste collection and reprocessing system DEECA will also:</p> <ul style="list-style-type: none"> advise the Minister for Environment to make the Household Waste and Recycling Service Standard and associated regulations in 2025 to support the roll out of the new four stream waste and recycling system, by 2027 issue and allocate waste to energy cap licenses within the final approved cap limit, by 2025. 	30 November 2027
2	<p>Where necessary, strengthen guidance and support to ensure responsible entities comply with the mandatory requirements.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> In part <input type="checkbox"/> In principle	<p>DEECA will review the need for amending the existing guidance following receipt of inaugural submissions from responsible entities, and strengthen guidance where assessed as needed by 30 June 2025.</p>	1 June 2028
3	<p>Improves data quality and communication of waste flow data and projections by:</p> <ul style="list-style-type: none"> collecting a more complete and accurate data set on key waste streams 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> In part <input type="checkbox"/> In principle	<p>DEECA will complete a review to identify opportunities to improve data collection methods to establish more complete and accurate data from the 2024 cycle and implement priority opportunities in the 2025 and 2026 cycles</p> <p>DEECA will prepare draft regulations under the <i>Circular Economy (Waste Reduction and Recycling) Act 2021</i> (CE Act) to prescribe data collection requirements that achieve more complete and accurate data sets on key waste streams and reporting requirements.</p>	1 April 2028

Response provided by the Secretary, Department of Energy, Environment and Climate Action, *continued*



No	Recommendations	Acceptance	Agreed Action	Completion Date
	<ul style="list-style-type: none"> where practical and where cost effective, identify and estimate the volume and movement of hidden, unknown, or emerging waste streams communicating the level of uncertainty associated with waste flow projections to users. 		DEECA will undertake a review of communication to users on data assumptions in publications and on the data hub, regarding the level of uncertainty associated with waste flow projections, and implement priority improvements in the 2025 and 2026 cycles.	

Department of Energy, Environment and Climate Action - action plan to address recommendations from VAGO's report: Recycling resources from waste 2024



EPA ref: C2903



Mr Andrew Greaves
Victorian Auditor-General's Office
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via email: [REDACTED]

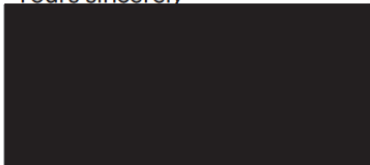
Dear Mr Greaves

VAGO Proposed report: Recycling Resources from Waste

Thank you for your letter of 26 February about the proposed report *Recycling Resources from Waste* prepared by the Victorian Auditor-General's Office (VAGO). I am satisfied the report is accurate and reflects our engagement with VAGO and other agencies. Its insights will inform future work across the environment portfolio to achieve better outcomes for the Victorian community.

I look forward to continuing to work with VAGO. If your office would like any further information, please contact [REDACTED].

Yours sincerely



Lee Miezis
Chief Executive Officer
13 / 03 / 2025

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12 March 2025

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By email: [REDACTED]

Dear Mr Greaves,

Response to Proposed Report: Recycling Resources from Waste

Thank you for providing Sustainability Victoria (SV) with the Proposed Report on Recycling resources from waste.

SV acknowledges the key findings of the report, and an action plan which outlines our response to the relevant recommendations is attached.

SV is committed to supporting a transition to a circular economy in Victoria and will continue to work closely with our colleagues in the Department of Energy, Environment and Climate Action (DEECA) and EPA Victoria to deliver improved material outcomes for the state.

Thank you for the opportunity to engage with the audit team throughout the audit process.

Yours sincerely

[REDACTED]

Matt Genever
Chief Executive Officer

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Sustainability Victoria: action plan to address recommendation(s) from *Recycling Resources from Waste*

No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
1	<p>Strengthen Victoria's current waste collection and reprocessing system, by identifying opportunities to:</p> <ul style="list-style-type: none"> improve the recovery of high-volume waste streams that currently have a low recovery rate with little or no change since 2020 enable Victoria to have the capacity it needs to meet projected recycling demand for key and emerging waste streams 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> In part <input type="checkbox"/> In principle	<p>SV will complete the delivery of the:</p> <ul style="list-style-type: none"> Recycling Modernisation Plastics Technology Stream to boost Victoria's capacity and capability to recover hard to recycle plastics; and Infrastructure and Investment Development Package to stimulate industry investment and build Victoria's recycling capacity <p>SV will work with DEECA to identify potential gaps in Victoria's infrastructure capacity to meet future recycling needs.</p>	<p>By late 2027</p> <p>By late 2027</p> <p>By 2026</p>

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Ref: BORG-1-25-957

Mr Andrew Greaves
Auditor-General of Victoria
Victorian Auditor-General's Office
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Dear Mr Greaves

Proposed Report: *Recycling Resources from Waste*

Thank you for your letter dated 26 February 2025 regarding the proposed report *Recycling Resources from Waste* (the Report) provided to the Victorian Infrastructure Delivery Authority (VIDA).

VIDA notes the Report's findings on Victoria's waste diversion and recycling targets, as outlined in *Recycling Victoria: A New Economy*. ecologiQ, a Victorian Government initiative facilitating the delivery of the Recycled First Policy under VIDA, continues to support these targets, with over 5.5 million tonnes of recycled materials and products used in road and rail infrastructure construction to date, that may have otherwise gone to landfill.

VIDA notes that none of the identified findings directly relate to VIDA's or ecologiQ's activities or responsibilities. VIDA remains committed to driving innovation in sustainable construction and contributing to Victoria's circular economy.

Yours sincerely



Kevin Devlin
Director-General

12 March 2025

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