

## **Initial Response to Defra's June 2011 Review of Waste Policy by the United Kingdom Without Incineration Network (UKWIN)**

Outlined below are some aspects of UKWIN's initial reaction to the Waste Review.

A fuller, 12-page, briefing is available from:

[http://ukwin.org.uk/files/pdf/UKWIN June 2011 Waste Review Briefing.pdf](http://ukwin.org.uk/files/pdf/UKWIN_June_2011_Waste_Review_Briefing.pdf)

### **Biogenic carbon**

Whilst we welcome the Government's move towards a carbon-centred approach to waste management, we note what we consider to be a regrettable failure to recognise the full negative impacts arising from the combustion of biogenic material, or indeed the associated shortcomings of WRATE (outlined in our submission to the Waste Review Call for Evidence, available from: [http://www.ukwin.org.uk/files/pdf/UKWIN DEFRA Submission 4 October 2010.pdf](http://www.ukwin.org.uk/files/pdf/UKWIN_DEFRA_Submission_4_October_2010.pdf)).

### **Persistent Organic Pollutants**

The Waste Review fails to address the responsibility 'gap' between the Environment Agency and Waste Planning Authorities into which avoidance of Persistent Organic Pollutants (POPs) falls. We await further guidance that resolves this oversight, especially in light of the comments in the Inspector's Report which informed the Secretary of State's recent decision regarding the refusal of permission for an incinerator to be built at the former Rufford Colliery in Nottinghamshire: "Uncontested evidence suggests that the proposed ERF would be a net producer of persistent organic pollutants (POPs) and that it is therefore necessary, under European law, to give priority consideration to alternative processes that would not generate and release these substances. This would appear to a matter for the planning regime, rather than the pollution control authority" (decision document available from: <http://www.communities.gov.uk/documents/planning-callins/pdf/1914959.pdf>).

### **Incinerator bottom ash eco-toxicity sampling**

The Review is silent regarding the issues raised with regard to the sampling and monitoring of incinerator bottom ash (IBA) eco-toxicity. Ongoing industry self-regulation, and the absence of Environment Agency accountability in this respect, serves to further undermine public confidence in the regulatory regime associated with waste management.

### **Projections of likely future waste arisings**

To help avoid exacerbating the over-capacity of incinerators in the UK, projections of likely future waste arisings and associated treatment capacity requirements should be based on an expectation of successful waste minimisation, the maximising of reuse and recycling, and the anticipated growth in the use of anaerobic digestion, all as part of a trajectory towards zero waste. This approach is broadly resonant with the assumptions underpinning the sustainability turn scenario within the Economics of Waste and Waste Policy document, and with Friends of the Earth's call for a halving of residual waste by 2020, and with the 2007 Waste Strategy's One Planet Living goal.

## **Guide to Energy from Waste (EfW)**

As might be expected, UKWIN is eager to be involved in the drafting of the proposed guide to EfW. The inclusion of organisations representing civil society seems to us to be an essential component in the production of a guide that is to credibly communicate the full range of recovery technologies available and their relative merits.

UKWIN has made a request to Defra asking to be closely involved with Defra, WRAP and DECC in the Guide's development. We also took the opportunity to call Defra's attention to some of the considerations, e.g. for Local Authorities, that UKWIN believes the Guide should include.

UKWIN believes that the Guide to EfW should address the following:

- The negative climate impacts arising from the combustion of waste including biogenic and non-biogenic material (especially when a facility does not make full use of any heat generated), as well as RDF/SRF, and the ways that combustion of material runs contrary to efforts to decarbonise the energy supply;
- The financial and environmental risks associated with the sort of long-term contracts that are often used to fund incineration facilities, including the potential disincentives these contracts pose for increased minimisation and recycling;
- The importance of considering the composition for the feedstock that would be available during the lifetime of the facility, including the impacts of separate collection of food waste and increases in recycling and waste minimisation on the quantity, availability and composition of the future "genuinely residual" waste stream, and the impact that this would have on the viability and sustainability (efficiency, climate impact, etc.) of any proposed facility.

## **Addressing Market Failures**

UKWIN notes that the Waste Review outlines the "economic rationale for action" (insert on pages 12 and 13) and includes a commitment to "provide the necessary framework to address market failures in delivering the most sustainable solutions" (page 62). The Economics of Waste and Waste Policy document elaborates upon this, and seems to raise the prospect of Government introducing both an incineration tax and a lower banding of landfill tax for bio-stabilised waste.

UKWIN has informed Defra that we are interested in participating in discussions with government about how best to address the market failures identified in the Waste Review.