



31<sup>st</sup> May 2013

To: Renewables Delivery Team (Biomass notification process),  
by e-mail to: [bio-notification@decc.gsi.gov.uk](mailto:bio-notification@decc.gsi.gov.uk)

Dear Renewables Delivery Team,

**RE: Consultation on a notification process for new build dedicated biomass projects**

UKWIN was founded in March 2007 to promote sustainable waste management and inform environmental decision making. UKWIN currently has more than 100 member groups. UKWIN welcomes this opportunity to comment on the proposed changes to the renewable obligations (RO) system.

1. UKWIN opposes the broadening of incentives to send material to any form of incineration (including all types of gasification and pyrolysis), and advocates for the removal of existing subsidies, including those resulting from un-internalised externalities.
2. In summary, UKWIN's position is that there is no need for new incineration infrastructure and that it would be inappropriate for incineration infrastructure to be subsidised by the Government. Public money should not be used to encourage increased incineration capacity, as subsidising incineration perversely discourages waste minimisation and incentivises burning material that should be reused, recycled, composted or anaerobically digested.
3. As Richard Benyon, Parliamentary Under-Secretary of State for Environment, Food and Rural Affairs, told Parliament: "Following the logic of the waste hierarchy, it is reasonable to ask whether, if we are burning waste, we need not recycle it. Worse, might we be providing incentives specifically not to reduce, reuse or recycle before recovering energy from waste?"<sup>1</sup>.
4. UKWIN views the current subsidies for incineration as an example of just such an incentive not to reduce, reuse or recycle, and UKWIN sees all existing incineration subsidies, both direct and indirect, as Environmentally Harmful Subsidies.
5. UKWIN would like to draw attention to the statement made by the Confederation of Paper Industries that: "Subsidies for Energy from Waste and large scale energy only biomass should be phased out as they put at risk supplies of the Paper Industry's basic raw materials – recycled fibres and wood pulp"<sup>2</sup>.
6. UKWIN also notes the Chartered Institution of Water and Environmental Management's observation that: "...There is a lack of clear policy on waste planning and this has led to inappropriate investment in handling and treatment technologies. Public funding from the EU budget needs to be prioritised to activities higher up the waste hierarchy (for example to re-use centres over waste disposal facilities). Currently most investment is directed to energy from waste because of the potential for the Renewable Obligation, feed-in-tariffs and Renewable Heat Incentive and this conflicts with the Waste Hierarchy..."<sup>3</sup>.

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<sup>1</sup> HC Deb, 16 February 2011, c1102

<sup>2</sup> UK Paper Industry Calls for U-turns in Manufacturing Policy. Confederation of Paper Industries, 18 September 2012

<sup>3</sup> Less is More. CIWEM, March 2013. Available from: [http://www.ciwem.org/media/719743/Less%20is%20More\\_online.pdf](http://www.ciwem.org/media/719743/Less%20is%20More_online.pdf)

7. These views are consistent with those expressed by many in British industry that incinerators: “...must demonstrably avoid competing with upper levels of the waste hierarchy – waste prevention, reuse and recycling/composting – by avoiding creating a demand for waste that could otherwise have been returned to the economy. In an increasingly resource constrained future it makes little sense to burn materials which can be reused or recycled elsewhere...”<sup>4</sup>.
8. The UK Government’s aim is “to get the most energy out of genuinely residual waste, not to get the most waste into energy recovery” and the EU aim is for “the phasing-out, by the end of this decade, of incineration of recyclable and compostable waste” and “to bring residual waste close to zero”<sup>5</sup>.
9. There is already more incineration capacity in the UK than available combustible genuinely residual waste, and additional incineration capacity would further undermine the management of waste at the top tiers of the waste hierarchy.
10. UKWIN has already outlined what we feel should and should not receive financial and other support, for example within our November 2011 submission to DCLG’s informal consultation on the Weekly Collections Support Scheme and within our February 2012 submission to HM Treasury’s PFI Reform Call for Evidence<sup>6</sup>.
11. In summary, whilst all forms of incineration should be discouraged, the following are just some of the measures that UKWIN believes should be promoted: ambitious recycling and waste reduction targets; kerbside sorting; educating householders and businesses about waste minimisation; increasing the types of Local Authority Collected materials accepted for recycling / composting (including via AD); educating householders about what is and is not recyclable to increase recycling rates and reduce contamination, thus improving recyclate quality; promoting re-use, including introducing re-use schemes at Household Waste Recycling Centres as per the Waste Review; and further improving recyclate quality through increased waste segregation.
12. UKWIN believes that there should be much stronger Government support for the separate collection of food waste for processing via anaerobic digestion (AD), especially as AD is currently threatened by incinerators that compete with AD facilities for feedstock.
13. Most of the biomass fraction of incinerators receiving the RO subsidy could be composted or anaerobically digested if suitable collection and treatment infrastructure were in place. Government RO subsidy for incineration is proving to be a significant barrier to investment in the infrastructure necessary to achieve the best environmental outcomes.
14. As the Anaerobic Digestion and Biogas Association (ADBA) explains: “Source-segregation and the treatment of organics through AD is the only way that we can recoup the value both of the energy and nutrients trapped in the food we throw away, as well as saving money. Incinerating valuable resources that can be recycled does not make environmental or economic sense in the long term. We are facing a period of economic difficulty that throws our short sighted attitudes to resource use into sharp relief. This is true of all our vital materials: paper, glass, metals, electrical components and food”<sup>7</sup>.

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<sup>4</sup> From Waste to Resources: Recommendations for Developing the Resource Security Action Plan. August 2012, joint statement from ADS, British Glass, British Plastics Federation, CPI, EEF, Packaging Federation, UK Steel, Metal Packaging Manufacturing Association, Institute of Environmental Management and Assessment, Resource Association, et al.

<sup>5</sup> European Parliament resolution of 24 May 2012 on a resource-efficient Europe (2011/2068(INI))

<sup>6</sup> Both of these documents are available from <http://ukwin.org.uk/resources/consultation-submissions/>

<sup>7</sup> Use our understanding of resource efficiency. MRW, 24 February 2012. Available from:

<http://www.mrw.co.uk/opinion/use-our-understanding-of-resource-efficiency/8626155.article>

15. Maintaining ROCs for AD and removing such subsidies for incineration would encourage investment in the move towards separate collection of food waste for AD, which would provide significant environmental benefits over incineration. However, these measures alone would be insufficient to ensure that food waste would be separately collected for AD.
16. ADBA's CEO specifically identifies incineration as a barrier to the implementation of the Government's preferred approach to the management of food waste, referring to the spread of incinerators as a "really worrying" threat to the separate collection of food waste for AD<sup>8</sup>.
17. UKWIN has firsthand experience of local authorities that do not collect food waste for AD simply because it is cheaper for them, if not for society as a whole, to send that food waste to incineration as part of the mixed waste stream.
18. To achieve efficient use of resources, the full impact of waste management needs to be internalised, and reduction, re-use, recycling, composting / AD need to be incentivised over options that are environmentally harmful, e.g. incineration.
19. The current system subsidises the incineration of waste through ROCs, FITs and rate relief, and allows for the full environmental cost of disposal (e.g. carbon emissions) to not be reflected in the price. Coupled with a lack of financial incentives for reduction and re-use, this leads to an unlevel playing field that incentivises the incineration of waste where it would be more efficient for the material to be reduced, re-used, recycled, composted or sent for AD.
20. The problem of this unlevel playing field is exacerbated by waste contracts that have put-or-pay or minimum tonnage clauses, as these effectively reduce the marginal cost of incineration by guaranteeing a payment based on availability of incineration capacity irrespective of whether or not waste is incinerated.
21. This situation is further exacerbated by the overcapacity of incineration, and unfortunately this situation looks set to worsen in the foreseeable future, as new capacity is coming on-line more quickly than old capacity is taken off-line. The direction of travel should be the other way, as residual waste arisings should be reduced in line with the move towards a closed loop circular economy.
22. In this regard, UKWIN notes the European Commission comments that: "We have to have a circular economy concept, so it's highly important that we're pumping back materials into the economy rather than burning or burying them"<sup>9</sup> and: "The big challenge is to reduce the amount of waste that is sent for incineration which could be recycled instead. In the UK there is a decrease in the proportion of waste that is going to landfill, which is good, but this is still a high proportion of the total waste...To solve this, the UK should look to reuse and recycling and not to overcapacity of incineration – Countries like Denmark and Switzerland are burning much more than they should and that's not good. There is an opportunity for the UK to take positively..."<sup>10</sup>.
23. In addition to suffering from all the usual problems associated with incineration, gasification and pyrolysis are particularly ill-suited to Government subsidy for waste management or energy generation because the technology does not work, with existing demonstrator projects only demonstrating that it is unlikely ever to work.

Kind regards,

Shlomo Downen, National Coordinator, UKWIN

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<sup>8</sup> Liberation of AD from its shackles. Neil Roberts. MRW, Vol 199, Issue 16. 4th May 2012.

<sup>9</sup> William Neale, member of cabinet for Potočnik with responsibility for waste [Resourcefully efficient. Resource Magazine, Nov. 2012. Available from: [http://www.resource.uk.com/article/Sustainability/Resourcefully\\_efficient-2449](http://www.resource.uk.com/article/Sustainability/Resourcefully_efficient-2449)]

<sup>10</sup> European Commission spokesman. UK edges up European recycling league table (letsrecycle.com, 1 March 2012).