

United Kingdom Without Incineration Network (UKWIN) and other Environmental NGOs,  
Correspondence address: [coordinator@ukwin.org.uk](mailto:coordinator@ukwin.org.uk)

**To: Steve Reed MP, Secretary of State for the Environment and  
CC: Mary Creagh, Defra Minister with responsibility for the circular economy**

Sent via email to: [correspondence.section@defra.gov.uk](mailto:correspondence.section@defra.gov.uk)

31<sup>st</sup> July 2024

**Urgent need to ban new incineration capacity  
to enable a transition to a zero waste economy**

Dear Minister,

We write to congratulate you on your appointment as the Secretary of State for the Environment and to celebrate your recent announcement confirming that "creating a roadmap to move Britain to a zero waste economy" is one of your core priorities.<sup>1</sup>

It is vital that the level of waste incineration provision across the UK, and in England in particular, is not allowed to undermine the move to a more circular, zero waste, economy.

To this end we are calling on you to urgently introduce a ban on new waste incineration capacity, and for you to direct the Environment Agency to revoke permits for incinerators that have yet to be built and not to issue any permits for new incineration capacity.

In support of these important asks, we note that:

1. A moratorium on new incineration capacity to support the transition to a more circular economy is already in place both in Wales and in Scotland;
2. Introducing a moratorium covering England would support the Environment Act 2021, including the achievement of the residual waste reduction targets;
3. Allowing new incineration capacity goes against the Government's climate change and grid decarbonisation ambitions;
4. Incineration competes with recycling and the top tiers of the waste management hierarchy; and
5. There are already significant levels of incineration capacity in England that is operational or under construction, and yet more capacity with planning permission and/or an environmental permit.

Thank you for your consideration of these points. Further details are set out within the attached annex and within the sources cited as part of that annex.

If you have any questions arising from this letter or should you wish to discuss the matters further, then we would be happy to correspond in writing or by means of a virtual or in-person meeting with you and your team.

Yours sincerely,

UKWIN and 50+ National and local environmental and/or health NGOs and other organisations and campaign groups (see overleaf for full list)

## Signatories to the letter

Biofuelwatch	Nottingham Friends of the Earth
Birmingham Friends of the Earth	Parishes Against Incinerator (PAIN)
Camp Brookfield	R.A.G.E against the incinerator
Carlisle Residents Against Incinerators (CRAIN)	Reading Against the Incinerator
Climate Emergency Camden	Residents Against Preston Incinerator
Consett Area Neighbourhood Forum	Rockcliffe & District Action Group
Cornwall Waste Forum St. Dennis Branch	Say No to Consett Incinerator
Coventry Green New Deal	Shireoaks and Rhodesia Against Plastic Pyrolysis (SRAPP)
Cycle Carlisle	South East Essex Organic Gardeners
Dovesdale Action Group	Stop Incineration North East (SINE)
EMERGE 3Rs	Stop Portland Waste Incinerator
EMERGE Recycling	Stop Ratcliffe Incinerator Campaign
Everyday Plastic	Stop the Edmonton Incinerator Now (StEIN)
Friends of the Earth (England, Wales and Northern Ireland)	Sustainable Carlisle Ltd
Greenpeace	The Portland Association: Jurassic Coast Against Incineration Project
Herefordshire Friends of the Earth	The Scarab Trust
Hull and East Riding Friends of the Earth	Touch Wood
Loughborough Air Quality Protection Group (LAQPG)	United Kingdom Without Incineration Network
Lowry Hill Residents' Association (LHRA)	We Say No to an Incinerator at Barr / Killoch
Manchester Friends of the Earth	Wisbech Without Incineration (WisWIN)
Medact	Wyre Forest Friends of the Earth
No Incinerator 4 Horsham (Ni4H)	Zero Waste Europe
No-ARC21	



**GREENPEACE**



**Friends of the Earth**



biofuelwatch



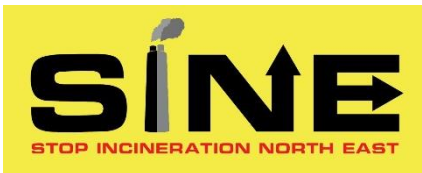
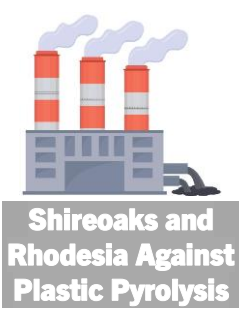
**EVERYDAY PLASTIC**



**CLIMATE EMERGENCY CAMDEN**



ni4h.org



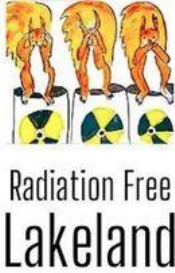





THE SCARAB TRUST



Additional signatories to the letter

Last updated: 19<sup>th</sup> August 2024

<p>Penrith Action for Community Transition (PACT)</p>	
<p>Stop the South London Incinerator</p>	
<p>Radiation Free Lakeland</p>	
<p>Dorset Climate Action Network (DCAN)</p>	
<p>People Opposing Woodhurst Incinerator (POWI)</p>	
<p>Westbury Gasification Action Group (WGAG) / No Westbury Incinerator</p>	

## ANNEX

### Learning from Wales and Scotland

The Welsh moratorium on new incineration capacity was introduced in March 2021 and was described as a key element of “taking action to make the circular economy a reality in Wales”.<sup>ii</sup> Wales went on to achieve 66% recycling in 2022/23<sup>iii</sup> with several Welsh local authorities reaching 70%+ recycling rates.

Dr Colin Church, in his incineration review commissioned by the Scottish Government, found: “...given the risks that incineration poses to human health and the environment, and the risk of lock-in, Scotland should not construct more capacity than it needs”.<sup>iv</sup>

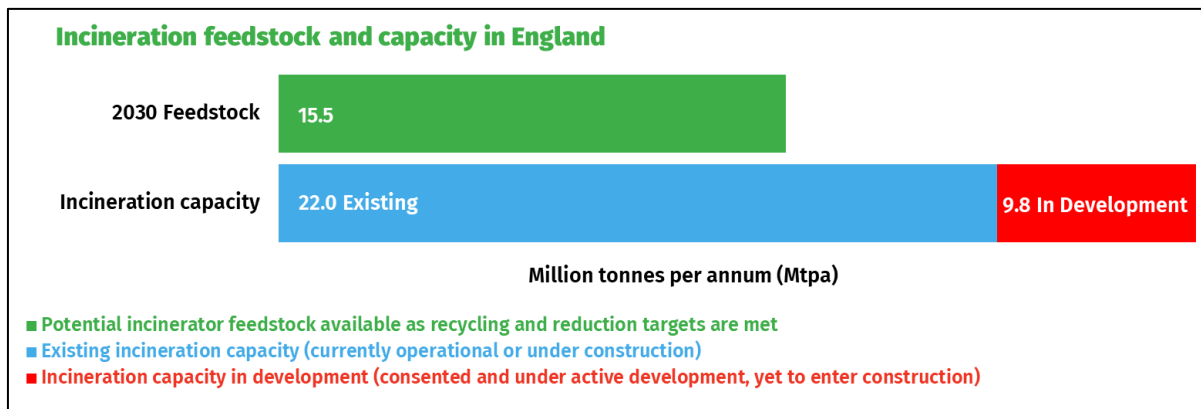
Scotland’s temporary ban from November 2021 was made permanent in June 2022<sup>v</sup> to encourage a circular economy<sup>vi</sup>, and Scotland’s recycling rate subsequently rose to more than 62%.<sup>vii</sup> This stands in stark contrast to England where for Local Authority Collected Waste in 2022/23<sup>viii</sup> the rate of incineration (49.1%) exceeded the recycling rate (40.7%).

### Residual waste reduction targets and incineration overcapacity

The 'Protecting nature' section of Labour's manifesto set out how "Labour is committed to reducing waste by moving to a circular economy" and promises to take action to meet Environment Act targets.

The Environment Act targets include the target to halve residual waste per capita sent to either incineration or landfill by 2042 compared to 2019 levels. This is enshrined in the Environmental Targets (Residual Waste) (England) 2023. The Environmental Improvement Plan 2023 sets out an interim target to reduce municipal residual waste produced per person by 29% and a number of measures to reduce residual waste.<sup>ix</sup>

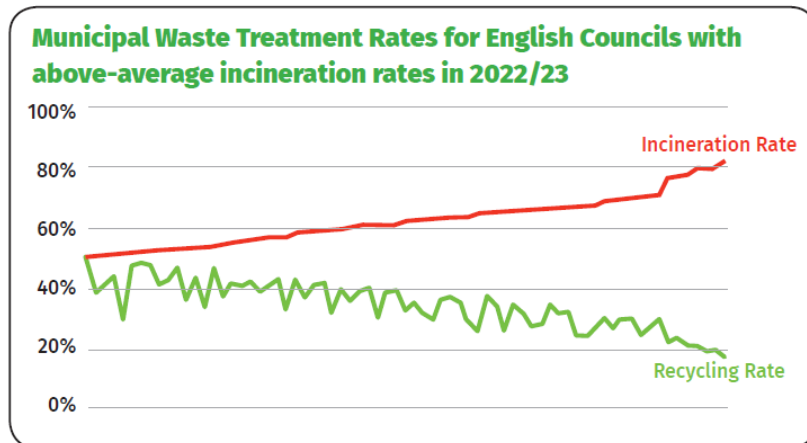
England currently has more than 17.3 million tonnes of headline incineration capacity that is operational and more than 4.6 million tonnes under construction, making a total of around 22 million tonnes of incineration capacity. Added to this, in terms of active projects, there is 9.8 million tonnes of capacity with planning permission of which 5.2 million tonnes also have an environmental permit.<sup>x</sup>



*Current incineration overcapacity based on feedstock reductions in line with targets*

There is very little non-recyclable combustible waste currently sent to landfill, and that means that meeting residual waste reduction targets will require a ban not only on new incineration projects going forward, but also on preventing incinerator projects already in the pipeline from going forwards.

## How incineration harms recycling



*There is a link between high rates of incineration and low rates of recycling.*

Data source: Defra

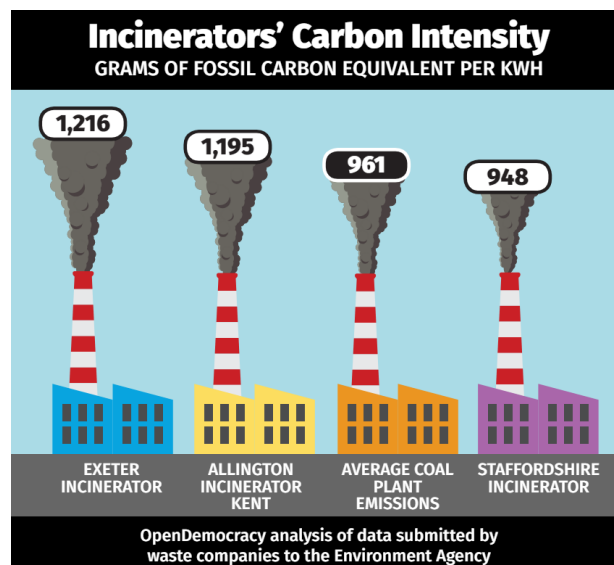
Incinerators are harming recycling by burning recyclable and compostable material.<sup>xi</sup>

Many Local Authorities told the Government that their low recycling rates were due to the terms of their respective incineration contracts undermining their ability to invest in recycling service improvements.<sup>xii</sup> Incineration overcapacity makes this issue worse by making it harder for councils to sell spare capacity to allow them to recycle more.

Alex Sobel MP, speaking on behalf of the Labour Party, noted that: "An overreliance on incineration as a means of tackling waste will, in the end, serve no one. That overreliance means we will be prevented from moving up the waste hierarchy in dealing with waste generally. It will stop us looking at waste as a resource that can be recycled, reused and put back into our society and the economy, and thereby kept out of the ground or prevented from contributing to toxic air".<sup>xiii</sup>

### The adverse climate impacts of incineration

Energy generated from burning waste comes with a higher carbon intensity than gas and sometimes coal, so a ban on new incineration capacity would support Labour's ambitious manifesto commitment to deliver zero-carbon electricity by 2030.



*For comparison, the carbon intensity of gas is around 360gCO<sub>2</sub>/kWh*



In 2021 the Climate Change Committee (CCC) argued that: “If EfW usage is left to grow unchecked, EfW emissions will quickly exceed those of the CCC pathway while undermining recycling and re-use efforts”.<sup>xiv</sup>

On the 30<sup>th</sup> of June 2023 the CCC called for “a moratorium on additional EfW capacity until a review of capacity requirements has been completed and an updated assessment of residual waste treatment capacity requirements published”, with recommendation R2023-073 stating that this is “a review of capacity needs and how they align with Government emissions pathway”.<sup>xv</sup> This call was repeated in the CCC’s 2024 report.

The capacity review is a reference to the CCC’s 2022 as-yet-unimplemented call for Defra to: “Publish an assessment of residual waste treatment capacity needs through to 2050, consistent with meeting committed and prospective recycling and waste reduction targets, expected resource efficiency improvements and the stated goal to end the landfilling of biodegradable waste by 2028” (R2022-311).

It is unclear the extent to which the previous Government’s unpublished review of waste incineration was consistent with the achievement of residual waste reduction targets.

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<sup>i</sup> @DefraGovUK social media post at: <https://x.com/DefraGovUK/status/1810253789242503250>

<sup>ii</sup> Welsh Government Press release ‘Wales takes action on Circular Economy with funding, upcoming reforms on plastic and a moratorium on large-scale waste energy’ available at <https://www.gov.wales/wales-takes-action-circular-economy-funding-upcoming-reforms-plastic-and-moratorium-large-scale>

<sup>iii</sup> My Recycling Wales Local Authority recycling data at <https://myrecyclingwales.org.uk/local-authorities>

<sup>iv</sup> Independent Review of the Role of Incineration in the Waste Hierarchy in Scotland. Scottish Government, 10 May 2022, available at <https://www.gov.scot/publications/stop-sort-burn-bury-independent-review-role-incineration-waste-hierarchy-scotland/documents/>

<sup>v</sup> Scottish Government news item ‘Putting limits on incineration capacity’, 16 June 2022, available at <https://www.gov.scot/news/putting-limits-on-incineration-capacity/>

<sup>vi</sup> ‘Moratorium on waste-to-energy incinerators’, 20 June 2022, available at <https://www.bbc.co.uk/news/uk-scotland-scotland-politics-61825698>

<sup>vii</sup> SEPA press release ‘Scotland’s recycling rate hits all-time high’, 26 March 2024, available at <https://beta.sepa.scot/news/2024/scotland-s-recycling-rate-hits-all-time-high/>

<sup>viii</sup> Defra Accredited official statistics ‘Local authority collected waste management - annual results 2022/23’, updated 1 March 2024, available at <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results/local-authority-collected-waste-management-annual-results-202223>

<sup>ix</sup> The Environmental Targets (Residual Waste) (England) Regulations 2023 available at <https://www.legislation.gov.uk/uksi/2023/92/contents/made> and Defra’s Environmental Improvement Plan 2023, 31 January 2023, available at <https://www.gov.uk/government/publications/environmental-improvement-plan>

<sup>x</sup> Headline capacity is permitted capacity where available. See <https://docs.google.com/spreadsheets/d/1HiSZBcr7G1XVbbvdy4sOpfSHvzZT1U5CosHTF-U-zow/> for a list of incinerators and capacity/status assumptions, and <https://ukwin.org.uk/overcapacity/> for the methodology use to calculate 2030 feedstock.

<sup>xi</sup> Incineration Overcapacity Technical Annex: Data, methodology and assumptions underpinning UKWIN’s overcapacity modelling, September 2023, available at <https://ukwin.org.uk/files/pdf/UKWIN-Incineration-Overcapacity-Annex-2023.pdf> (pages 12-14)

<sup>xii</sup> Defra FOI release: ‘Local authority letters on recycling rates’, 13 March 2018, available at <https://www.gov.uk/government/publications/local-authority-letters-on-recycling-rates>

<sup>xiii</sup> Hansard ‘Waste Incineration: Permit Variation’ Volume 723: debated on Thursday 1 December 2022, available at <https://hansard.parliament.uk/commons/2022-12-01/debates/A6421102-2B57-4CB2-9F0A-0325129B9888/WasteIncinerationPermitVariation>

<sup>xiv</sup> 2021 Report to Parliament: Progress in reducing emissions (Climate Change Committee, June 2021) available at <https://www.theccc.org.uk/publication/2021-progress-report-to-parliament/>

<sup>xv</sup> 2023 Report to Parliament: Progress in reducing emissions (Climate Change Committee, June 2023) available at <https://www.theccc.org.uk/publication/2023-progress-report-to-parliament/>