
York Residents Against Incineration

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Waste Strategy Consultation
City of York Council
The Guildhall
York
YO1 9QN

Tuesday 8th November 2010

Dear Waste Strategy Team,

We would like to register our objections to the Waste Strategy PFI in its current form. We believe that the proposal to enter into a 25-year contract to incinerate waste is in conflict with Council policy to reduce greenhouse gas emissions and increase recycling. The economic case is flawed and outdated, and insufficient consultation was carried out on the plan before going to tender. We also are not convinced that there will be no health impacts due to emissions.

We will be submitting a petition with over 700 signatures on it to the Council Executive on 30th November.

In the sections below we elaborate on each of these areas.

1. Consultation

Residents of York and North Yorkshire have never been consulted on different waste disposal technologies. The consultation produced in November 2005 offered two choices, both of which involved building a mass-burn Energy from Waste (EfW) incinerator.

This, despite the fact that the Best Practicable Environmental Option report showed that alternatives involving higher levels of recycling was both cheaper and less damaging to health and the environment¹. Such an option was not put forward for consultation because officers did not believe that a 60% recycling target was feasible by 2020 – a position which now appears hard to justify given that municipalities in the UK are already achieving recycling rates between 60%-70%.

The consultation was carried out in December 2005, over the Christmas period. There were widespread reports of the consultation not being received – which is not uncommon with any mass mailing. However, this consultation was particularly badly affected. Council officers acknowledged at the time that there was a problem with leaflet distribution (and arrangements would be changed in 2006), and we were told that there would be another consultation later in the year which would include disposal technologies². This did not take place.

¹ Options 2a & 10a, which involve no thermal treatment process, scored higher on both criteria.

² In a Fishergate Ward Committee Meeting, 7th Feb 2006

The response rate in the City of York area was 0.7% and unsurprisingly, given the lack of any real choice, *"the results of the public consultation on this Strategy did not show a strong preference overall for either option."*³

Instead, the strategy went to tender on a supposedly 'technology neutral' basis, but with economics skewed towards incineration (see below). We regard this as a failure of political leadership.

The options for waste disposal were solely dictated by the private sector, and there was no proper consultation. Neither politicians nor citizens have been presented with any meaningful choice.

2. Impacts on recycling

AmeyCespa claims that there will be no impact on recycling, composting and reuse rates. For instance:

"We expect the Allerton Waste Recovery Park to help us achieve and exceed our 2020 50% recycling target early. We could further increase our recycling figure if we could include the recycled incinerator bottom ash (IBA) in our figures.... If we achieved 55% recycling and could then add in IBA it would take our recycling performance up to 65%."⁴

However, as mentioned, municipalities in the UK are already achieving recycling rates between 60%-70% - and this without the need to include IBA. AmeyCespa's recycling aspirations are not ambitious. The Waste Strategy has set the target of 50% for 2020, and no further targets beyond this date, despite this contract lasting until 2040.

There have been many claims and counter claims about what impacts the need to fuel a 270,000 tonne-a-year incinerator will have on the Council's recycling efforts. However the following are certain:

- The incinerator will require a constant stream of waste to be viable
- AmeyCespa's bid included a set of for Guaranteed Minimum Tonnages (GMT) to be supplied by the Councils over the contract period. The amounts increase steadily year-on-year over the period.
- The Councils may be liable to pay compensation if GMTs are not met
- Elsewhere in the world, local authorities have struggled to increase recycling whilst tied into such a contract:
 - Cleveland County Council's Associate Director of Environmental Services said of their waste disposal contract "essentially we are into waste maximization"⁵
 - Hampshire and Sheffield have both had to vary the planning conditions to allow municipal waste incinerators to get sufficient waste - which has not gone well.

Other authorities who have commissioned incinerators and then developed a poor recycling record include Nottingham and Newcastle - the latter managing to turn around their record once they began to work seriously with community groups toward a 'zero waste' policy.

³ "Let's Talk Less Rubbish" waste strategy document, pg. 21-22

⁴ AmeyCespa's Q&A Update, October 2010

⁵ Friends of the Earth Scotland (2002). "Incineration or Something Sensible?"

We can be reasonably sure that these authorities did not intend to limit themselves in the ways that they did. We have no reason to assume that our situation will succeed where so many have failed.

York joined the "Zero Waste Places" initiative this year. We cannot become a 'zero waste place' whilst supplying a guaranteed minimum tonnage to an incinerator. The plans are in conflict with many Council strategies, including our efforts to reduce carbon emissions.

In the absence of clear and ambitious targets set for recycling and composting, this contract will represent a disincentive to increase recycling levels.

3. Economic Considerations

The Waste Strategy has, from the beginning, been built on speculation. The Best Practical Environmental Option (BPEO) report assumed an increase in waste volumes from 2004 to 2010, when volumes would level off and remain static for the next 15 years⁶. When figures were published for 2004-5, waste volumes had fallen. The BPEO had been proved wrong even as the consultation finished. Yet at no point was there any re-examination of the outcomes.

Waste volumes in York are still below 2004 levels. EU legislation on packaging and waste is still being brought into force, and we are witnessing a massive expansion in home composting and biodegradable packaging. The waste strategy did not foresee these effects, and has not learnt from them. It still assumes a growth in waste volumes over the 25-year period of the strategy.

If waste continues to fall – as indeed it should, with the encouragement of the Councils – then the economic case begins to deteriorate. The saving of £320 million that is often quoted by the Waste Partnership and AmeyCespa (against an entirely 'straw man' do-nothing option) looks even more spurious.

Technology has moved on also. Anaerobic Digestion (AD) has become established as a proven and profitable technology. This has been recognised by AmeyCespa, who will use it to deal with 12.5% of the waste. It could be used to a far greater extent, had the BPEO not been so outdated at the time the strategy finally went out to tender.

And policy has moved on - the coalition government recently began a new round of consultation on waste strategy. This is in line with the pledge in the Government's Coalition Agreement committing the UK to "work towards a zero waste economy", and "measures to promote a huge increase in energy from waste through anaerobic digestion."

A further assumption on which the Strategy rests is that of landfill tax. The Partnership has built its business case on these taxes reaching £175 by the end of the contract period. Yet rates have not been set beyond 2014, except that they will not fall below £80 per tonne before 2020.

The rising landfill costs are driven by EU measures designed to encourage sustainability and recycling. However, if Councils respond to the higher landfill costs by building incinerators then the policy would be producing exactly the opposite effect to that which was intended.

⁶ BPEO, page 3-8

The new government has a clear zero-waste agenda, which will not support incineration. We may well see a different approach, and a completely different landfill tax regime. In this situation, the projected savings as against doing nothing become completely illusory.

As usual with PFI schemes, the Councils will bear all the risk, should the venture not prove profitable.

It is further worth pointing out that employment, and therefore the local economy of York, would benefit greater from a high recycling strategy than one based on mass-burn. As well as generating more than twice as much revenue, recycling provides around ten times the number of jobs per tonne of waste as compared to incineration⁷.

The flawed assumptions and outdated information on which the PFI case is based mean we will be overpaying for an oversized incinerator, when alternative options may be cheaper for the taxpayer and better for the local economy.

4. Sustainability

As already mentioned, alternatives to EfW were found to be better for the environment, but have not been costed, or included in consultation or options presented to Councillors.

The carbon-efficiency of EfW – the amount of carbon generated per unit of electrical energy – is complex. EfW is given an artificial boost in the BPEO assessment by making the unjustified assumption that any energy generated by a waste facility will offset emissions exclusively from coal fired power stations, rather than a grid average. It receives another one from the exclusion of CO₂ generated by burning “renewable” waste (paper, cardboard etc.), with no consideration given to CO₂ emissions saved by recycling said waste.

If we exclude this biogenic waste, EfW performs better than coal but worse than natural gas⁸. If, however, we assume recycling levels will increase, in line with Council policy, then this biogenic fraction becomes less significant, and EfW becomes one of the worst technologies available in terms of its climate change impact.

Many full-lifecycle studies have shown that generally, it costs less energy (and therefore less carbon) to recycle most materials than it does to burn them, generate electricity from that, and make a new one from a virgin natural resource⁹.

EfW is not a sustainable technology.

5. Health

Much has been made about the improvement in emissions standards of incinerators required by the EU. The Health Protection Agency has attempted to close the ongoing debate on the subject – “the HPA said that it did not recommend doing any more studies of public health around modern, well managed municipal waste incinerators as the effects are probably not measurable.”¹⁰

⁷ “More Jobs, Less Waste”, Friends of the Earth report
http://www.foe.co.uk/resource/reports/jobs_recycling.pdf

⁸ “A Changing Climate for Energy from Waste?” Friends of the Earth report
http://www.foe.co.uk/resource/reports/changing_climate.pdf

⁹ “Recycling Versus Incineration: An Energy Conservation Analysis”, Dr Jeffrey Morris, Sound Resource Management

¹⁰ “Let’s Talk Less Rubbish” waste PFI information leaflet

Unfortunately the recent history of incinerators in Britain demonstrates that all too often, they are not very well managed at all. You can see our website for a rich history of mismanagement and explosions at waste incinerator sites – including but not limited to Crymlyn Burrows, Teeside, Edmonton, Kirklees, Dundee, Newcastle, Nottingham and Sheffield.

The EU has regulated very effectively the emissions known to be injurious to health. The open question is still around those emissions not currently understood. There is a growing body of evidence suggesting that nanoparticles emitted by incineration may pose a health risk. These are very fine particles whose size is of the order of 1 nm (nanometre – a millionth of a millimetre). Science is only just beginning to understand and investigate the unexpected properties of such small packets of matter, and we are some way off being able to quantify and regulate such emissions.

The safety of incinerators is not proven, and the record of the technology is undeniably poor.

6. About YRAIN

York Residents Against Incineration was formed in 2006 in response to the lack of choice offered to York residents in the consultation (see above). We have been collecting signatures since an inaugural meeting, and presented over 400 signatures to the Council Executive in June 2006.

The petition is worded as follows:

We the undersigned call on the Council to abandon plans to build an incinerator for York's waste. We believe -

- Incineration is a proven health risk.
- Incineration is counter to the Council's recycling targets and its stated vision of York as "A Healthy City" and "A Sustainable City". If recycling is successful an "Energy from Waste" incinerator plant will not be, and vice versa.
- The consultation on the strategy has been mismanaged and misleading.

We will re-present our petition, now standing at 710 signatures, at the meeting of the Council Executive on 30th November. Our sister organisation, NYWAG (the North Yorkshire Waste Action Group), active across North Yorkshire, has collected over 6,000 signatures on a similarly worded petition.

Public opinion is against mass-burn technologies.

For all these reasons, we urge you to reject the current Waste Strategy bid and develop an alternative based on up-to-date information and technology. The strategy must include ambitious targets for waste reuse, recycling and composting for its full duration and these must have primacy over landfill diversion. It should also embrace the concept of 'zero waste'.

Yours sincerely,

Richard Lane, Guy Wallbanks, Andreas Heinemeyer and Ivana Jakubková
on behalf of York Residents Against Incineration