

## **Submission from Green Alternatives to Incineration in Scotland**

The Scottish Government's new Zero Waste Regulations aim for 70% recycling by 2025, a target it describes as "ambitious and challenging". However several local authorities in the UK, such as South Oxfordshire District Council, have already broken the 70% barrier, while San Francisco City & County has achieved 77% recycling.

Why then should it take a further 13 years for Scots to achieve the same levels of recycling? The answer lies in the weakness of the new Regulations.

For example local authorities are to be given nearly 4 years to supply householders with food waste bins. Why the delay?

Similarly, councils are being given 8 years to stop sending biodegradable waste to landfill. This is almost unbelievable. Biodegradable waste, consisting mainly of paper, card, textiles, food and garden waste, can easily be recycled or composted.

And why has the requirement for local authorities to collect textiles been removed altogether from the new Regulations? Again no plausible answer has been provided.

In the meantime waste companies are queuing up all over Scotland to build enormous waste incineration plants. There are two reasons for this.

Firstly, the new Regulations allow the remaining 30% of Scotland's waste, i.e. the stuff that isn't recycled, to go for incineration. This guarantees that there will always be plenty of things to burn.

Secondly, the Government plans to give huge subsidies for electricity generated by modern incinerators in the form of Renewables Obligations Certificates. These will generate an income of around £60 for every tonne of waste that is burnt, in addition to the gate fees of £100 per tonne that will be charge to local authorities. It is no wonder that at least 20 huge incinerators are planned around Scotland, each costing between £25 million and £400 million.

This is a grotesque waste of public money. Recycling is not only cheaper, but also much better for the economy. Friends of the Earth have calculated that recycling generates around 36 times more jobs than incineration.

And of course there is the health issue. Nearby communities are terrified of the potential for harmful emissions from waste incinerators. They are right to be afraid. Many of the most dangerous emissions, such as heavy metals and dioxins, are only checked twice a year, which means that excessive emissions can go unnoticed for months. One such check in 2008 found that the DERL incinerator in Dundee was emitting over 100 times the legal limit for dioxins.

What, though, will be burnt? This is where things get really murky, as no-one in Government or the waste industry will say precisely which items will be sent

for incineration. To do so would immediately prompt the question, "Why can't you recycle them instead?"

In practice there are very few things that cannot be recycled, and the number is falling all the time. Only last year a new plant opened in England to recycle disposable nappies.

In general if a thing can't be recycled easily, then we should stop making it. A prime example is metalised plastic, which has become ubiquitous in the food packaging industry. This cannot be recycled, and would almost certainly be incinerated if the facilities were available. Recycling plastic saves 5 times more energy than can be recovered by burning it.

Incineration is fundamentally unsustainable, recovering only a tenth of the energy used to make the products in our rubbish. Worse, it effectively writes off the huge quantities of CO<sub>2</sub> generated during their manufacture, amounting to around 3 tonnes for each tonne of waste.

Incineration is not the solution for Scotland's waste management problem. Rather it is an environmental crime, which is being inflicted on the Scottish people by a lazy and timid government that refuses to make the required investment in modern recycling infrastructure, or to take the necessary action to prevent waste being produced in the first place.