

Response of Môn a Gwynedd Friends of the Earth to the Consultation on the North Wales Regional Waste Plan

Having examined the Consultation Document and the background material, Môn a Gwynedd Friends of the Earth has a number of serious concerns about the conduct of the review of the Regional Waste Plan. It appears to us more appropriate to document these concerns in this written submission than to use the questionnaire, of which we have some criticisms. Our comments are as follows:

1. The consultation is excessively narrow: it focusses on how to deal with residual waste but ignores waste minimisation, re-use, recycling and composting. We would have expected the consultation to be broader. Despite waste minimisation being top of the waste hierarchy, it receives no attention. There is also a lack of attention to re-use and recycling, although the Vision Statement in the last Regional Waste Plan read as follows: "The Vision for the Regional Waste Plan is: To provide a sustainable landuse planning framework in response to the need to change the way that waste in North Wales is managed, by helping to facilitate an integrated and adequate network of new and modern waste management facilities, which will contribute to re-use and recycling opportunities for the waste generated in the Region for the benefit of the environment and for the people of the Region, whilst providing new local employment and economic growth." .
2. Following life cycle assessment using the WRATE tool and sustainability appraisal, both undertaken by the Environment Agency, seven potential waste treatment options were derived, all of which include incineration in one guise or another. We wish to draw attention to very important inadequacies in the assumptions underlying this analysis.

In running the WRATE tool to assess the extent to which the options under consideration would allow conformity with the Landfill Allowance Scheme targets for municipal solid waste (MSW) in 2020, a growth scenario of 3% per annum was assumed (*Sustainability Appraisal and Life Cycle Analysis of Strategic Waste Management Options; Summary report for the North Wales Regional Waste Group*). Furthermore, a table on p. 9 of the main consultation document ("*North Wales - Regional Waste Plan - Consultation Document*") shows an estimate of 691,090 tonnes of municipal waste by 2013. This has been derived by assuming a "+4% per annum" growth scenario for the years 2005/6 to 2013/4, though this fact is tucked away in *Appendix D, "Current & Forecast Waste Arisings", North Wales Regional Waste Plan 1st Review Technical Companion, "Draft for Consultation September 2007"*. These assumptions of a high rate of growth in MSW inevitably impact on the options selected as preferable, and most importantly, they conflict with the general aims of the Welsh Assembly regarding waste minimisation. Consider "*Wise About Waste*": The target cited there is 300 kg household waste per person per annum by 2020, which is about half the figure in 2003/4. One can make a rough estimate of how this figure of 300 kg household waste per person per annum would translate into tonnages in the North Wales Area: The 2003 WAG projections for population in North Wales suggested a figure of 698,000 by 2026, but this

excludes Powys, part of which (North Powys) is encompassed by the Regional Waste Plan. The calculated population of Powys in 2016 is 135,000 for 2016. We do not have at our disposal the breakdown for North vs South Powys. However, if one takes a generous 80,000 figure for North Powys and adds it to, say, 690,000 (the population in 2020 will be slightly lower than in 2026), a total population of 770,000 is derived for the area under consideration in the Regional Waste Plan. 770,000 at 300 kg per person yields ca. 231 million kg per annum for the area, or ca. 231,000 tonnes. These figures are massively below the projections based on the +3/+4% scenarios.

In our opinion waste minimisation and the maximisation of recycling and composting should lie at the heart of the Regional Waste Plan, not at its periphery. Projections regarding residual waste should not be based on past poor performance, but rather should reflect agreed Welsh Assembly targets, likely implications of future EU Directives, likely consequences of climate change-related legislation and trends in improved product design and packaging. It is worth noting in this context that the DEFRA figures for the past 5 years show only an average 0.2% increase in MSW in England, and the worst figure during that period was well below the assumptions made in the present consultation. Furthermore, at a recent meeting with Council Leaders and Chief Execs etc., Jane Davidson proposed a 70% recycling and composting target by 2025 -- well above the 50% rate assumed when running the Environment Agency's WRATE tool.

If it is assumed that the aforementioned 70% recycling/composting target and the waste minimisation target could indeed be achieved, it can only be concluded that the analysis underlying the current consultation is extremely misleading. The question arises as to why the WRATE tool was not run using other assumptions regarding waste arisings and the recycling/composting rate. This is in our view a very serious failing.

We consider that the incorrect or dubious assumptions made in the analysis inherently entail a preference for large-scale regional facilities with associated long contracts and guaranteed tonnages that will prove very profitable for waste disposal firms but not represent the best option in terms of either cost or environmental best practice (e.g. adherence to the proximity principle). We consider that the nature of these assumptions, in particular an ongoing large increase in waste arisings, renders the consultation (including the Consultation Document and the online questionnaire) a tendentious process. We note in this respect that there have been many recent conferences promoting the incineration of waste (EfW) while there has been a lack of any comparable focus on waste minimisation.

3. While cross-border arrangements may be appropriate for certain waste streams, we are critical of the apparent assumption that regional solutions are per se preferable. Local solutions, with a smaller carbon footprint, should always be sought before considering regional facilities. On Anglesey there are particular concerns that an incinerator might be planned for the Penhesgyn site, with the capacity to take waste from a wide region; we would oppose the use of Penhesgyn for this purpose.

4. We do not favour incineration as a means of dealing with residual waste. The online questionnaire presented in relation to the current consultation inevitably leads the respondent to favour some form of incineration. We are concerned by the toxic fly ash produced and the nature of emissions, in particular fine particulate matter [inhalation of airborne fine and ultrafine particulate matter has been identified as a major route of exposure to toxic combustion by-products; see, for example, Cormier SA et al. (2006) "Origin and health impacts of emissions of toxic by-products and fine particles from combustion and thermal treatment of hazardous wastes and materials." *Environ Health Perspect* 114(6): 810-7]. We therefore cannot support any of the options presented in the Consultation.

Conclusion

We consider the consultation to be based on an analysis that is seriously flawed owing to the assumptions that have been made. We favour optimal waste minimisation and the maximisation of re-use, composting and recycling, and the Regional Waste Plan should address these issues (and contain some consideration of the commercial sector and its needs). We are opposed to the options suggested in the Consultation because of the distorting impact of long-term incineration contracts and the potential problems still associated with even the most advanced, relatively untried incineration options.