



Labour Party Debate on Waste Management

14 September 2011

Scotland's waste mountain

Friends of the Earth Scotland welcomes the opportunity to brief ahead of this important debate. Despite welcome progress in recycling, large volumes of recyclable or compostable materials – around 2.3 million tonnes per year - remain in the municipal, commercial and industrial waste streams, ending up in landfill sites or waste incinerators.

Landfill and incineration have serious environmental justice impacts. They increase greenhouse gas emissions and can have significant health and quality of life impacts on nearby communities. Too many poor decisions are currently being taken.

Politicians and developers need to ensure that communities are properly informed about waste-related proposals and developments, they need to facilitate community participation in relevant decision-making processes, and they should ensure that affordable opportunities are available for communities to challenge poor decisions or poor process.

A 'ticking incineration timebomb'

There are currently proposals for around twenty new waste incinerators in Scotland, including controversial proposals in Loganswell, Dovesdale, and Carnbroe. If all twenty incinerators were built, we would burn around 2 million tonnes of waste every year.

Most incineration proposals require long-term contracts. This risks 'locking in' local authorities to contracts requiring substantial supply of waste. Experience demonstrates that this removes the impetus to reduce waste and can also place local authorities at a disadvantage when waste policy and regulations are updated. For example, Dumfries and Galloway's Ecodeco plant may struggle to comply with zero waste secondary legislation.¹

Large-scale biomass

There are a number of biomass plant proposals in Scotland at present. Concerns have been raised that some these may become waste incinerators once operating. Friends of the Earth Scotland has serious concerns about the scale of many of these proposed plants, particularly around whether they produce electricity and/or heat and where they might source their fuel wood from.

Forth Energy is proposing to build four plants in Rosyth, Dundee, Grangemouth and Leith. Together, these would burn 5.3million tonnes of wood. Scotland's annual wood production is less than 0.5 million tonnes, rising to 2 million by 2020.² A number of American forestry and environment groups have raised concerns that Forth Energy's proposal would lead to significant pressure on Florida's forests.³ The Forth Energy proposals are primarily for electricity production, with heat generation as an after-thought.

¹ Elaine Murray speech, Scottish Parliament official report 8 September:

<http://www.scottish.parliament.uk/Apps2/Business/ORSearch/ReportView.aspx?r=6377&mode=html>

² Woodfuel Taskforce report:

[http://www.forestry.gov.uk/pdf/WoodfuelTaskForceUpdateReport_2011.pdf/\\$FILE/WoodfuelTaskForceUpdateReport_2011.pdf](http://www.forestry.gov.uk/pdf/WoodfuelTaskForceUpdateReport_2011.pdf/$FILE/WoodfuelTaskForceUpdateReport_2011.pdf)

³ American groups open letter to Scottish Government: <http://www.foe-scotland.org.uk/biomass-us-objection>

Solutions

We need tough measures to tackle Scotland's waste mountain. In particular we need to consider:

- 1. Waste reduction targets:** Ambitious waste reduction targets and an effective programme to deliver them should be established alongside the measures set out in Scotland's Zero Waste Plan to increase recycling rates to 70%. The mechanisms available to achieve these targets include local taxation, education and regulation.
- 2. Tackle upstream waste:** Too much of the focus for waste management is currently on downstream waste, municipal waste from householders. Greater focus should be paid to supermarkets and product manufacturers who should be encouraged or required to reduce excess packaging at source.
- 3. Moratorium on large incinerators and biomass plants and strict rules for others:** A moratorium on incineration proposals and biomass plants above 50 MW should be considered. Alongside this, there must be strict rules on facilities only being allowed to handle segregated rather than mixed waste. Similarly energy recovery must include heat recovery, preferably via anaerobic digestion rather than incineration.
- 4. Selective material incineration bans:** Scotland also needs to give consideration to selective incineration bans to complement proposed landfill bans. This approach has been effective in Flanders, helping achieve a 70% recycling rate. While the Scottish Government has committed to landfill bans, incineration bans must also be delivered in order to drive investment towards waste reduction and recycling.
- 5. Reform of Renewable Obligation Certificates:** The Scottish Government needs to reform subsidies for renewable energy operators to discourage large-scale biomass for electricity plants like Forth Energy's proposals in Rosyth, Dundee, Grangemouth and Leith. Energy Minister, Fergus Ewing, has stated that the Scottish Government will look at this in the Autumn.⁴
- 6. Proper access to environmental justice:** It is currently prohibitively expensive and difficult for individuals and communities to legally challenge poor decisions or poor process in the planning system. The Scottish Government must ensure affordable access to environmental justice in line with its commitments under the Aarhus Convention.⁵

Conclusion

There is an obvious link between Scotland's waste policy and the number of incineration proposals we face. Communities need to be properly consulted and allowed to challenge poor decisions or processes. Government and politicians must also take forward ambitious measures to reduce the amount of waste we produce in the first place.

Unless we 'up our game', we face increasing numbers of speculative proposals that are bad for the climate and have negative health and quality of life impacts on communities.

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⁴ <http://www.scotland.gov.uk/Publications/2011/08/04110353/0>

⁵ For more information on this issue, see our access to environmental justice explained briefing: <http://foe-scotland.org.uk/A2EJexplained>