

Consultation on the proposed alteration to the Lothian and Borders Area Waste Plan

Lothian and Borders BPEO Review Paper

Lothian and Borders AWP Review Strategic Environmental Assessment Environmental Report:

Proposed Alteration (Section 3 of the Lothian and Borders Area Waste Plan)



A response from Friends of the Earth Scotland

22 August 2007

1. Introduction

Friends of the Earth Scotland is an independent member of the Friends of the Earth International network. We undertake research, advocacy and community development activities throughout Scotland in pursuit of environmental justice and sustainability.

Due to the nature of the consultation, and its timing Friends of the Earth would like to raise the following issues of concern in relation to the proposals.

2. Key issues

Impacts on communities

We are concerned that the consultation is highly technical and therefore inaccessible to the general public, and will hence garner a poor response from those affected. This is despite the fact that the policy changes could have significant implications for communities throughout the Lothians. We would welcome assurances that any decision made at this stage in the process will not curtail or constrain future public consultation and debate. In this respect, we note from the report the fact that all options could have negative effects on local environments and communities. Mitigation of impacts is assumed, but that is not to say these impacts will be acceptable to the communities that are candidates for specific facilities.

Recommendation: Plan for a full and frank public consultation on waste management in the Lothians, including potential site options.

Context

To date little has been done at either a local or national level to promote waste reduction, which is the overarching priority for effective waste policy. In this respect, recycling across the Lothian area is at a modest level; varying significantly between local authorities and is still below 30% despite rapid improvements in recent years. Performance compares poorly with best practice in Scotland (Clackmannanshire: 40%ⁱ) the UK (North Kesteven 51.5%; Rushcliffe 49.9%; St Edmundsbury 48.6%ⁱⁱ) and the continent (Flanders: 70%ⁱⁱⁱ and the waste produced per person is half of that in the Lothians^{iv}). In this respect, the proposals seem to assume we can't achieve Flanders' level of performance - even by 2020. We note that only two of the options, 5

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& 6, as summarised in Table 1, actually meet and exceed the current National Waste Plan Target of 55% recycling and composting.

Recommendation: reject all options, which fail to deliver at least 55% recycling and composting and seek to develop new options that reflect current levels of best practice.

Develop new options with higher recycling levels comparable with best practice.

Predominance of energy from waste / incineration

Apart from the do nothing / landfill option, all the proposed alternatives to the status quo are based on the adoption of energy from waste capacity, and assumptions that significant levels of prevention are not likely to be feasible. The assumption that energy from waste is the most important means of meeting Landfill Directive targets ignores clear evidence from abroad about the potential scope and effectiveness of waste prevention and recycling. The majority of the options cap recycling at sub optimal levels and instead use incineration as the preferred waste management option. This is despite the fact that in terms of environmental benefits (energy, emissions and resource use^{v vi}) waste prevention and recycling outperforms incineration and carries much higher levels of public support.

At a time when waste prevention is rising up the agenda and recycling is becoming more developed both in the UK and abroad, we find it disappointing that there are moves to increase rather than decrease the amount of waste projected for disposal via incineration, compared with four years ago. We believe councils are overestimating the practical issues surrounding the early development of recycling schemes and underestimating the long-term benefits of aspiring to continental levels of recycling. In summary, we argue that the case for any significant use of energy from waste is at the present time unproven. The length of contract necessary to make an energy from waste facility cost effective risks constraining levels of recycling in the long-term - perhaps even until the late 2020s. Recycling levels have been constrained in both Denmark^{vii} and more recently in Hampshire^{viii}, where they compete with high energy from waste capacity. This would mean that the Lothians would be highly constrained in contributing to the zero waste society, envisaged by the current Scottish government.

We also question whether energy from waste can be classified as delivering genuine or significant carbon emission savings. Research by Friends of the Earth shows that electricity from waste compares poorly to gas fired power stations; facilities that generate heat, as well as power, are marginally better^{ix}. We also do not accept the definition of energy from waste as renewable, given that the raw materials are essentially derived from non-renewable resources and in most cases require fossil fuels in their production. Food waste is the notable exception to this rule if it is collected and utilised to generate biogases, although the emphasis should still be on reducing waste.

Recommendation: Reconsider the level of energy from waste being proposed, since it would prevent achieving high rates of recycling comparable with the best in Europe.

Recommendation: Re-evaluate whether it is appropriate to classify energy from waste as renewable or as an effective means to reduce carbon emissions.

3. Conclusion

We have submitted a short response to the consultation, because we believe the premise on which it is based is flawed. Waste prevention and 70% recycling rates are achievable and in the case of Flanders is already a reality; yet, by 2020 the Lothians will not have reached this level based on these proposals. We find this level of ambition unacceptable. For this reason

we cannot support any of the options in the consultation, but reserve particular scorn for option one through four, due to the very low recycling rates that they envisage.

We would welcome a more aspirational debate on the future of waste management in the Lothians. This should be explicit about the real choices and implications faced by communities. We submit that failure to do this will foster public discontent and store up problems later in the process as Councils seek to locate and build large waste treatment facilities.

For further information please contact:

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Notes

ⁱ Waste data digest 7: 2005/2006 Data SEPA 2007

ⁱⁱ Collection changes boost recycling, say council chiefs, Press Association Guardian Unlimited Wednesday April 25 2007

ⁱⁱⁱ Note of a Seminar with Christof Delatter, VVSG and Paul Macken, IOK from Flanders, 11 December 2006

^{iv} Ibid 1

^v Environmental benefits of recycling: An international review of life cycle comparisons for key materials in the UK recycling Sector”, Waste & Resources Action Programme, 2006.

^{vi} “Impact of Energy from Waste and Recycling Policy on UK Greenhouse Gas Emissions, Final Report for Defra”, ERM, January 2006.

^{vii} Data from Waste Centre Denmark. 2005 data for household waste. Storage for incineration classified with incineration.

^{viii} “Hampshire EfW plants topped up with recycling centre waste”, www.letsrecycle.com, 21st April 2006. & Research by Friends of the Earth England, Wales and Northern Ireland.

^{ix} “Dirty Truths: Incineration and Climate Change”, Friends of the Earth, May 2006