

**Friends of the Earth Scotland**  
**SITA Incinerator, Aberdeen - Departure Hearing**

**Flawed Process:**

- Contract signed between Aberdeen City Council and SITA before the Area Waste Plans had been developed and finalised therefore prejudicing the ability of the Area Waste Plan to deliver an integrated and sustainable management system for the North East of Scotland.
- The proposal is not in line with guidance issued to assist each of the 11 Scottish Waste Strategy Area Groups in developing their Area Waste Plans (AWPs):

*Integrated waste management is defined in the National Strategy as “the development and delivery of waste management systems and services, which, with a high degree of planned efficiency and at an acceptable balance of costs and benefit, are capable of minimising the level and hazard of waste produced, maximising resource use efficiency and value recovery from wastes that are produced, whilst protecting the environment and human health”.*

SEPA 2000 - BPEO guidance (check date contract signed compared to this statement).

**Things have moved on:**

- Since signing the contract with SITA the Government made commitments to drastically increase recycling:

*“We will set targets for local authorities to recycle 25% of waste by 2006 and 55% by 2020 through increasing use of doorstep collection and through provision of recycling facilities in every community.”*

Scottish Executive – Partnership Agreement 2003.

- We are beginning to see many more real examples in the UK of the practical possibilities of sustainable waste management which reduce landfill dependency and avoid incineration:

*“It is entirely possible to achieve the Landfill Directive without using incineration, using a flexible ‘pick and mix’ option. Such an option would utilise source separation, kerbside collection, composting, recycling and mechanical screening to deal with municipal waste in a way that actively contributes to the economic, social and environmental goals of sustainable development”*

Peter Jones, Director, Biffa Waste Services.

- The move towards ‘zero waste’ is gathering huge momentum both internationally and also in parts of the UK. An incinerator of the scale proposed will hold Aberdeen back from developing more progressive sustainable solutions.
- The impact of forthcoming EU Directives on the waste stream:
  - i) EC Directive on Packaging and Packaging waste requires Member States to recover 50% of packaging waste from June 2001.
  - ii) EC Directive on Waste Electrical and Electronic Equipment (WEEE) requires Member States by August 2005 to adopt "appropriate measures in order to minimise the disposal of WEEE as unsorted municipal waste and to achieve a high level of separate collection of WEEE". With a target of 4 kg per capita and proposal to increase this in 2008.

## Project Scale and the Proximity Principle

The current proposal would be based on burning 160,000 tonnes of waste per year.

However:

- *‘Aberdeen City Council is committed to reducing the amount of household waste being generated by 1% year on year, to reducing 40% of it going to landfill and to achieving a minimum of 25% recycling and composting by 2005.’*

Aberdeen City Waste Strategy 2001 – 2021

- In 1999 Aberdeen City Council collected 123,700 tonnes of waste (90,000 from households and remainder from local businesses), 94% of which was landfilled. Therefore the proposed incinerator would burn more rubbish than all the shops, businesses and homes in Aberdeen actually produce.

Assuming

- Waste arisings were reduced by 1% year on year
- Recycling targets of 25% by 2006 and 55% by 2020 were met

	Arisings (tonnes)		
	Generated	Recycling	Residual
2000	124,000	7,316	116684
2020	101,420	55,781	45639

- The current proposal would not be viable based on waste produced solely from the Aberdeen area.

- The scale of the current incinerator proposal is clearly not in accordance with the commitment within the Aberdeen City Waste Strategy:

*“Aberdeen City Waste Strategy 2001 – 2021 is founded on:  
The Proximity Principle ensures that we do not burden other communities with our waste and transport emissions. It should encourage communities to take responsibility for locally produced waste. It means we must establish a network of treatment and disposal facilities to handle waste as close as practicable to the point of production.”*

### **For entire North East waste strategy area:**

Total waste collected 2000/2001 per year = 320,700 tonnes

Assuming

- Waste arisings were reduced by 1% year on year
- Recycling targets of 25% by 2006 and 55% by 2020 were met

	Generated	Recycling	Residual
2020	262318	144275	118043

- Even if the facility were to import waste from the entire North East waste strategy area the facility would not be viable.

- LondonWaste’s application to increase capacity at Edmonton incinerator was rejected on the basis that it was contrary to proximity principle and would crowd out recycling. DEFRA said it would create a centralised facility serving seven local authorities “which in the absence of sufficient local waste, could further increase the pressure to import waste from outside the local area...”

- The MRF is under capacity for the volume of recoverable and recyclable waste produced in Aberdeen.

### **Environmental Injustice**

Chosen location will further promote environmental inequality, the area already has been subject to:

- Sewage treatment facility
- Fish processing factory
- Incinerator
- Landfill

### **Proposal is not the BPEO**

#### **No incentive for waste minimisation:**

- Building new incinerators works against waste minimisation and increasing re-use and recycling rates. Contracts with incinerator operators simply act to lock local authorities into long term commitments to provide huge amounts of waste each year. Local authorities could then be forced to pay incinerator operators financial penalties if they were too successful in waste minimisation and recycling!
- Incinerators must operate at or near capacity throughout their 25-30 year lifetime if capital investments are to secure a return – once built this incinerator would act as a structural impediment to significantly reducing waste arisings.

### **Emissions and Health:**

House of Commons Environment Select Committee in March 2001:

*“concern about the impacts of emissions from incinerators upon human health” cannot be dismissed while “emissions standards are still based on what can be measured and what is technologically achievable, rather than what is safe”.*

Environment, Transport and Regional Affairs Committee, Delivering Sustainable Waste Management, 14 March 2001.

- Municipal incinerators in UK in 1999 and 2000 – 10 incineration plants exceeded pollution limits 553 times. Whilst newer facilities may have technical ability to perform to improved emission standards emissions and hence risks to health are also dependent on the standard of operation and the precedent is not good.

### **Toxic Ash**

- Incinerators do not eliminate the need for landfill – they achieve a maximum of 70% reduction in mass of waste incinerated and produce contaminated ashes that have to be landfilled or ‘recycled’
- LondonWaste Edmonton incinerator was found to be mixing fly ash with bottom ash and selling on for use in road building until this practice was exposed.

### **Energy from the plant**

- The Environment Statement refers to the energy being produced as ‘renewable’ However the House of Commons Environment Select Committee in March 2001 stated that: *incineration “will never play a major role in truly sustainable waste management and cannot, and should not, be classified as producing renewable energy.” “sustainable waste management has as its cornerstone the minimisation of waste, and the explicit maintenance of waste streams for the purpose of incineration is a complete contradiction of this principle.”*

Environment, Transport and Regional Affairs Committee, Delivering Sustainable Waste Management, 14 March 2001.

- The two materials that supply a significant calorific value in municipal waste are plastics and paper/card:

Plastics – climate impact is like burning fossil fuels

Paper – far more efficient in resource and energy use to recycle than burn.

Energy saved by recycling materials as opposed to burning:

Paper 3 times

Plastic 5 times

Textiles 6 times

### **Incineration's Track Record in the UK**

- Edmonton incinerator – routinely sent mixed bottom and fly ash for use as construction aggregates.
- Stockpiled 25,000 tonnes of fly and bottom ash at an open site in Dagenham in 2001 – including substantial amount of dioxin laden fly ash.
- September 2001: Environment Agency enforcement action of Edmonton for CO exceedence – in one instance 4 times over legal limit.
- July 1998 – LondonWaste (SITA subsidiary) fined 38,500 for burning types of clinical waste prohibited by its authorisation at Edmonton incinerator. Found guilty on 11 of the 12 charges.
- January 2001 – SITA appeared before Wolverhampton magistrates, plead guilty to 5 offences at its Wolverhampton tyre incinerator, Agency said offences were “symptomatic” of its “failure to maintain proper standards of operation”  
Fined 28,500 – included fines for breaches of particulate emissions limits and failing to notify the Agency.
- May 2000 several homes next to the tyre incinerator site were covered in fine layer of black dust as a result of a broken equipment on residues handling system.

### **Alternatives to Mass Burn Incineration.**

#### **Increase Recycling**

- Organic waste and dry-recyclables can take 70-80% of household waste – out of waste stream.

- Local Authority Waste Arising Survey in Scotland 2000/2001

50% of household waste is potentially recyclable (paper, card, some plastics, textiles, glass and metals)

40% can be composted (organic waste and some paper, card, textiles etc.)

- Opinion surveys show that more than 80% of people would participate in kerbside recycling if the necessary facilities were in place.

- Internationally many cities have achieved reductions in landfilling of up to 70% without

incineration and in time periods of 5 years or less.

**Other Technologies are available which would avoid dependancy on landfill or incineration e.g. Mechanical and Biological Treatment, anaerobic digestion.**

**Examples:**

- Essex – adopted a 60% diversion of waste from landfill target by 2007 without incineration.
- Edmonton in Canada reuses recycles or composts 70% of household waste.
- Wye Kent - Community composting and recycling scheme – residual waste put out for collection now 250 kg per household per year (UK average 1000 kg).
- Walden – East Sussex – increased recycling from 4% to 53% in 2 years where it has introduced kerbside recycling.
- Toronto - 60% diversion by 2006, 100% by 2010.

Organics collected each week  
Anaerobic digestion main treatment method for organics  
Recyclables collected every 2 weeks  
Residual resources collected every 2 weeks

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