

End incineration in Scotland now: a vital part of the fight against climate change

A review on the role of incineration in Scotland is currently being conducted by a team of independent reviewers set up by the Scottish Government. Citizens and community groups are being asked about their views on incineration as part of this process. Friends of the Earth Scotland are calling for an end to incineration in Scotland because it has both direct and long term consequences for the fight against climate change. There are new incinerators on the cards in Scotland, so we need to act now to stop the expansion of this destructive practice.

By responding to the Call for Evidence, you can help ensure the government understands the importance of this issue to the people of Scotland.

Why is incineration bad for the climate?

1. Greenhouse gas emissions from burning waste

Incineration of waste contributes directly to the climate crisis when carbon-based materials, such as plastics, are burnt and their emissions released into the atmosphere. On average, for every tonne of waste burnt, one tonne of CO₂ is released into the atmosphere¹. Incineration rates of household waste have risen over 750% in ten years from 2011 to 2020². This means emissions from incineration have risen rapidly too. The UK Climate Change Committee now estimates that incineration emits more greenhouse gas emissions than coal in the UK³. The most effective way to cut emissions from existing incinerators is to ban the burning of plastics on climate change grounds.

2. Incineration locks us into unsustainable practices

Our current economic model demands perpetual growth and over-consumption of goods and services. Incinerating waste ensures we remain in this system because, if something is burnt, it can't then be reused or recycled, we have to use up more of the planet's resources instead. Increasing demand for new plastics is used to justify the continuation of other climate wrecking industries, such as oil extraction.

On top of this, the more incinerators that are built, the more incentive there is to send waste to be burnt, rather than processed in more sustainable ways. The lack of progress on recycling is evidence of this "lock-in" happening in Scotland today. Household recycling rates fell 3% in 2020 to 42%, a long way off the 70% target for 2025. If we don't end incineration now, Scotland will not meet its climate change or waste goals.

3. CCS will increase the problem, not end it

Carbon capture and storage (CCS) has been proposed as a way of minimising emissions from incineration whilst allowing burning to continue. However, this can increase plastic use and disposal, rather than preventing plastic production in the first place. In addition, CCS can prevent *some* emissions reaching the atmosphere

¹ <https://ukwin.org.uk/files/pdf/UKWIN-2018-Incineration-Climate-Change-Report.pdf>

² <https://www.sepa.org.uk/environment/waste/waste-data/waste-data-reporting/household-waste-data/>

³ <https://www.letsrecycle.com/news/waste-sector-not-a-priority-for-cop-26-webinar-hears/>

but, in practice, CCS is expensive, inefficient and risky. CCS is not a solution to Scotland's incineration problem.

4. Other concerns: health impacts

Incinerators emit many toxins and pollutants that harm local air quality. Several recent studies have highlighted new concerns around the health hazards of incinerators on human health⁴. Incinerators are three times more likely to be in poorer areas in the UK⁵, whose residents already suffer worse health outcomes from disproportionately higher levels of air pollution and inequality.

What are Friends of the Earth Scotland asking for?

- **Extend the moratorium on new and current applications for incinerators to make it permanent** – The Scottish Government paused decisions on new incinerators whilst the review is happening. We need a permanent ban, similar to the ban introduced by Wales last year. Scotland does not need any more incinerators.
- **An immediate ban on plastics sent to incineration** – burning plastics produces carbon emissions. The simplest and fastest way to reduce emissions from existing plants is to ban the burning of plastics. They should be recycled instead.
- **Ensure any greenwashing 'solutions' are not implemented at the public's expense** – incinerators have failed to deliver on energy efficiency promises to develop local heat networks. Greenwashing 'solutions', like carbon capture and storage, would create further lock in to an expensive and polluting waste management system.

How you can help: respond to the Call for Evidence by 21st February

Email your response to this address: incineration-review@gov.scot by **21st February 2022**. Remember to state you are responding to the Scottish Incineration Review, and leave a name and email address if you would like a reply. Please share your response and any replies with us at info@foe.scot.

You can find more details on the review by downloading the incineration review [call for evidence](#) from the Scottish Government website.

More information about the environmental and social impacts of incineration and [sign our e-action](#) is available on the Friends of the Earth Scotland website.

⁴ Including the [ELAPSE study](#), published in the BMJ (2021) which concluded “Long term exposure to outdoor air pollution was positively associated with Mortality: even at levels well below the EU limit values, US Environmental Protection Agency national ambient air quality standards, and WHO air quality guidelines for fine particles and nitrogen dioxide”.

⁵ Greenpeace (2020) [Unearthed](#)