Comment for planning application WSCC/036/20

Application number	WSCC/036/20
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Type of Comment	Objection
Comments	As Parliament declared a climate emergency last year, this seems to be moving in the wrong direction. Incineration exacerbates climate change Incineration releases significantly more CO2 for every kWh exported to the electricity grid than the conventional use of fossil fuels, with the incineration of plastics being worse than coal (Source, Source) Incineration results in high levels of greenhouse gas emissions. For every tonne of waste burned, typically around one tonne of CO2 is released into the atmosphere, and around half of this is fossil CO2 (Source). This means that incineration has a higher carbon intensity than the conventional use of fossil fuels, and significantly higher than what most people would consider 'low carbon'. In 2017 the UK's 42 incinerators released a combined total of nearly 11 million tonnes of CO2, around 5 million tonnes of which were from fossil sources such as plastic. The 5 million tonnes of fossil CO2 released by UK incinerators in 2017 resulted in an unpaid cost to society of around 325 million (Source). Even when methane generation from the landfill of biogenic material is taken into account, over its lifetime a typical waste incinerator built in 2020 is estimated to release the equivalent of around 1.6 million tonnes of CO2 more than sending the same waste to landfill (Source). When electricity generation is taken into account, each tonne of plastic burned at that incinerator would result in the release of around 1.43 tonnes of fossil CO2 (Source). Composition analysis indicates that much of what is currently used as incinerator feedstock could be recycled or composted, and this would result in carbon savings and other environmental benefits. Thus, incinerating waste comes with a significant 'opportunity cost' that has a significant adverse climate change impact (Source). plastic contains substantial embedded carbon in the material itself, which is released as CO2 when plastics are incineratedа continuation of the current shift towards burning plastics would result in substantial additional emissions in 2050Clearly, the incineration of fossil-based plastics cannot continue in a low-carbon economy - The Circular Economy - a Powerful Force for Climate Mitigation (June 2018). Published by: Material Economics SEE MORE QUOTES ABOUT THE CLIMATE CHANGE IMPACTS OF INCINERATION [Top] Incineration is a barrier to the Circular Economy Moving away from incineration is a key element in moving towards a more circular economy because, instead of being destroyed, materials and nutrients can remain available thereby avoiding the additional extraction of finite resources The 'linear economy' relies on extraction and processing, followed by consumption and disposal (via incineration or landfill). Extraction and disposal deplete finite resources and cause environmental and social harm. With a circular economy the value of resources is preserved, material and nutrients that are needed to create new products are maintained, and the most is made of existing resources. (Source) Incineration has no place in the circular economy towards which we should be working. Incineration waste finite resource, squanders nutrients vital for the health of our soil, and is recognised as a 'leakage' to be minimised (Source, Source, Source). Products currently being incinerated should be treated at a higher tier of the Waste Hierarchy, and where that is not possible they need to be 'designed out'. "One of the central pillars of a circular economy is feeding materials back into the economy and avoiding waste being sent to landfill or incinerated, thereby capturing the value of the materials as far as possible and reducing losses" - Circular economy in Europe - Developing the knowledge base. European Environment Agency, January 2016. SEE MORE QUOTES ABOUT INCINERATION BEING A BARRIER TO THE CIRCULAR ECONOMY [Top] The UK already faces incineration overcapacity Calculation of residual treatment overcapacity based on UKWIN's analysis of Eunomia's Residual Waste Infrastructure Review, 12th Issue (Source) The UK currently has more incineration capacity existing and under construction than genuinely residual waste to burn, and there are many more incinerator projects in the pipeline.
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Attachments	