I strongly object to this proposed building of an Energy Recovery Facility (ERF) at Forde. The effects of such a huge facility on the local landscape, and the rise in traffic to service this facility will have been documented in many consultation submissions. I support all objections on these grounds, but I wish to concentrate my objections on the grounds of climate change.

That we are in a climate and ecological emergency is at last recognised at all levels of government. Our actions in the next decade are crucial to this.[1] Unfortunately measures to deal with the emergency lag well behind and emissions globally continue to rise.[2] This is partly due to many schemes and developments that purport to reduce but in fact add to global emissions. This ERF is such a scheme.

In December 2020 the Committee on Climate Change (CCC) submitted their Sixth Carbon Budget report. They make a series of recommendations on reducing emissions on waste[3], and in the light of the government's recent commitment to reducing emissions by 78% [4]by 2035, these are recommendations that should not be ignored. Building a new ERF facility is in conflict with these government commitments.

The main CCC recommendations for dealing with waste in their Balance Pathway scenario are

- Behaviour change and demand reduction. This includes a 51% reduction in food waste by 2035 and 61% by 2050, and a 68% increase in recycling by 2050.
- A ban on biodegradable waste on landfill sites by 2025 and a full ban on landfill by 2050.
- Installing Carbon Capture and Storage (CCS) on all ERF by 2050

At no point in their report do they recommend in increase in ERF. In the next years there has to be legislation to meet the demanding new targets and it seems unlikely that this legislation will support new facilities such as this one.

These CCC recommendations conflict with the proposed application in a number of ways.

1. This is a very large facility intended to process a very large amount of waste. If government policies succeed in reducing demand and waste, where are these large amounts of waste to come from? A Green Party report [5]shows how recycling rates have gone down in numerous councils where ERFs have been installed. Partly this is due to the contracts where councils have to deliver set amounts of waste. They also have to deliver a set proportion of biodegradable waste to ensure the efficiency of

[1] https://news.un.org/en/story/2020/02/1056622

[2] https://wedocs.unep.org/bitstream/handle/20.500.11822/34438/EGR20ESE.pdf?sequence=25

[3] https://www.theccc.org.uk/publication/sixth-carbon-budget/ P.187 - 193

[4] https://www.gov.uk/government/news/uk-enshrines-new-target-in-law-to-slash-emissions-by-78-by-2035

[5] https://www.scribd.com/document/383927762/Green-party-report-on-incineration-and-recycling

the combustion. Some councils have even had to import waste from the EU to service the ERF. Not only does all this increase greenhouse gas emissions but it could put the council in conflict with any government measures likely to be introduced in the coming years.

2. An ERF produces very large amounts of CO_2 in the combustion of waste. The planning application[6] lists a "net carbon saving of approximately 48,102tonnes of carbon dioxide equivalent (tCO2e)".
   The first point to make here is this is a net saving that compares the emissions with landfill waste sites as the baseline. However, the CCC recommendations put in place measures that will decrease the use of landfill considerably in the coming years. Landfill as a baseline has clearly been chosen to provide as large a figure as possible as a carbon saving. In the next decade there should be much more recycling and much less waste. The large amounts of emissions from the ERF, however, are likely to continue, and will compare unfavourably with the reduced emissions in other areas.
   This net emissions reductions includes offsetting on the electricity the facility would produce. [7]This is simply greenwash. The emissions will not magically disappear because electricity is produced. Other power stations do not offset their emissions against their electricity.
   The calculation is based on a 25 year lifetime of the facility. However, the standard lifetime of such a facility is actually 40 years. This would take us to well beyond 2050 and the net zero target.
   By 2050 this proposed ERF would have to be converted to CCS, according to the CCC recommendations. This is a very expensive process, assuming the technology is found to be effective at scale by then, something that is still far from certain. As well as expensive in monetary terms it is expensive in energy. It is possible that as much as 25% of the energy produced will have to be used to power the CCS. The predicted carbon savings in this application make no allowances for these kinds of changes and therefore should be considered unreliable.
3. Not only are we in a climate emergency, but we are also in a plastic emergency. The problems of plastics in our ecosystems are only now becoming apparent. The implications for our health are huge.[8] Burning these plastics are a huge waste of a valuable resource that results in the need to produce yet more virgin plastic with its consequences on our and our planet's health.

I urge you to reject this planning proposal.

Ann Stewart. BSc. Hons (env)

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[6] file:///Users/annstewart/Downloads/ES_chapter_00_Non-Techical%20Summary.pdf NTS 62.

[7] Ibid NTS 61

[8] https://www.theguardian.com/environment/2019/may/15/single-use-plastics-a-serious-climate-change-hazard-study-warns