



Ms Abigail Phillips  
Clerk to the Petitions Committee  
National Assembly for Wales  
Cardiff Bay  
CF99 1NA

3 January 2012

Dear Ms Phillips,

**Response to petition on Prosiect Gwyrdd**

Further to your letter of 16 November 2011, inviting views on the above petition, I attach a note setting out the views of the Welsh Environmental services Association (WESA) on the questions posed in your letter. WESA is the trade association representing Wales's waste and secondary resource industry. We are a leading partner in Wales's transformation from a disposal to a zero waste society and our members have helped Wales' municipal recycling rate increase to 45%. WESA members recover both value and energy from the Wales's waste whilst protecting the environment and human health.

While the attached response touches on the health impacts of energy from waste plants, you may be interested to know that we have submitted a detailed assessment of this issue to the Prosiect Gwyrdd Scrutiny Committee in response to the latter Committee's consultation on this topic. If this is a topic which your Committee decides to explore in depth, please let me know and I can send you a copy of it.

In principle I would be willing to give oral evidence to supplement the attached response if asked to by the Committee.

Yours sincerely

Matthew Farrow  
Director of Policy

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[www.esauk.org](http://www.esauk.org)

154 Buckingham Palace Road London SW1W 9TR

Tel: 020 7824 8882 Fax 020 7824 8753 e-mail [info@esauk.org](mailto:info@esauk.org)

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**RESPONSE BY THE WELSH ENVIRONMENTAL SERVICES ASSOCIATION TO THE PETITION ON PROSIECT GWYRDD RECEIVED BY THE PETITIONS COMMITTEE OF THE NATIONAL ASSEMBLY FOR WALES**

The Welsh Environmental Services Association (“WESA”) is the trade association representing Wales’s waste and secondary resource industry. We are a leading partner in Wales’s transformation from a disposal to a zero waste society and our members have helped Wales’ municipal recycling rate increase to 45%. WESA members recover both value and energy from the Wales’s waste whilst protecting the environment and human health.

**Q1. What, in your view, is the best method of disposing of non-recyclable waste?**

A1. The principle must be to deal with non-recyclable waste in a way which safeguards human health and the environment, while where possible recovering some value from it for society and the economy. Historically the main way of dealing with non-recyclable waste was to dispose of it to landfill, and today’s modern landfill sites are well-engineered to protect the environment and to capture landfill gas to create energy. But the scope to continue with landfill is diminishing, due to EU targets and national policies (plus the main economic driver of increasing landfill tax) which aim to preventing waste and recycling or recover more of what’s left – in line with the so-called “waste hierarchy”. That is why other methods of dealing with non-recyclable waste are coming to the fore, including a whole range of different technologies ranging from controlled combustion to anaerobic digestion and composting. The waste industry we represent is technology neutral and will use the proven technologies which best meet the needs of its clients, be they businesses or local authorities, and which are most suitable for the various waste streams that need to be dealt with, bearing in mind issues of cost, environmental protection, and public policy.

**Q2. What are the advantages and disadvantages (in terms of the environment, health, local economy etc) of incineration?**

A2. Modern energy from waste plants are very different from old-style incinerators. First they are much cleaner and safer in terms of emissions, thanks to technological advances and stringent EU controls, so that they pose effectively no risk to human health and the environment\*. Secondly they are much more efficient at recovering energy, and in some cases heat too, from the wastes they burn, and can make a useful contribution to energy supplies. So the benefits of energy from waste as opposed to landfill are that it is better for the environment, provides useful energy, helps meet EU and national targets on waste and energy policy, and provides more jobs than landfill. On the downside, energy from waste should only be used for wastes which are not recyclable or compostable (where economically feasible and environmentally beneficial), ie what is sometimes known as “residual waste”.

The larger energy from waste plants are substantial capital projects requiring major financing and project management skills, but they can offer valuable economies of scale. It is important that investment in residual waste treatments such as energy from waste does not run counter to continuing efforts to reduce waste in the first place, and to recycle or compost as much as possible of the waste that remains. It is notable that those European countries which have the highest recycling rates also have a significant energy from waste sector for residual waste – and almost no landfill.

**Q3. Do you think it's a good idea for local authorities to collaborate on waste policy, which could lead to resource savings, or is it more important for them to find the most appropriate solution for their locality? What are the reasons for your answer?**

A3. This is ultimately a choice for local communities and their elected representatives to make. Wales has the advantage of having unitary authorities, which means that responsibility for waste collection and waste disposal is in the same hands, which is not always the case elsewhere in the UK. There can be advantages in local authorities collaborating, for example in offering similar or complementary collection systems for householders and businesses in neighbouring areas, and in achieving value for money in contracting with waste companies who can achieve economies of scale when providing facilities for the recycling and treatment of waste over wider areas. But equally, depending on the local circumstances and the waste stream in question, there can also be advantages to small scale local solutions such as anaerobic digestion plants or in-vessel composting for food waste or garden waste. So its very much "horses for courses".

\*In response to the Prosiect Gwyrdd Scrutiny Committee's consultation on the health effects of Energy from Waste plants, WESA commissioned a review of the research evidence in this field from global sustainability consultancy AEA Technology. This report, entitled *Review of research into health effects of EfW facilities* has been submitted to the Scrutiny Committee.

**WESA**

**January 2012**