

Consultation on petition P-04-341 Waste and Incineration  
Response from Chartered Institute of Environmental Health



Chartered Institute of  
Environmental  
Health

Sefydliad Siartredig  
Iechyd yr  
Amgylchedd

# Waste Disposal

Response to the National Assembly for Wales Petitions  
Committee



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Environmental  
Health

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## Sefydliad Siartredig Iechyd yr Amgylchedd

Fel **corff proffesiynol**, rydym yn gosod safonau ac yn achredu cyrsiau a chymwysterau ar gyfer addysg ein haelodau proffesiynol ac ymarferwyr iechyd yr amgylchedd eraill.

Fel **canolfan wybodaeth**, rydym yn darparu gwybodaeth, tystiolaeth a chynghor ar bolisiâu i lywodraethau lleol a chenedlaethol, ymarferwyr iechyd yr amgylchedd ac iechyd y cyhoedd, diwydiant a rhanddeiliaid eraill. Rydym yn cyhoeddi llyfrau a chylchgronau, yn cynnal digwyddiadau addysgol ac yn comisiynu ymchwil.

Fel **corff dyfarnu**, rydym yn darparu cymwysterau, digwyddiadau a deunyddiau cefnogol i hyfforddwyr ac ymgeiswyr am bynciau sy'n berthnasol i iechyd, lles a diogelwch er mwyn datblygu arfer gorau a sgiliau yn y gweithle ar gyfer gwirfoddolwyr, gweithwyr, rheolwyr busnesau a pherchnogion busnesau.

Fel **mudiad ymgyrchu**, rydym yn gweithio i wthio iechyd yr amgylchedd yn uwch ar yr agenda cyhoeddus a hyrwyddo gwelliannau mewn polisi iechyd yr amgylchedd ac iechyd y cyhoedd.

Rydym yn **elusen gofrestredig** gyda dros 10,500 o aelodau ledled Cymru, Lloegr a Gogledd Iwerddon.

## The Chartered Institute of Environmental Health

As a **professional body**, we set standards and accredit courses and qualifications for the education of our professional members and other environmental health practitioners.

As a **knowledge centre**, we provide information, evidence and policy advice to local and national government, environmental and public health practitioners, industry and other stakeholders. We publish books and magazines, run educational events and commission research.

As an **awarding body**, we provide qualifications, events, and trainer and candidate support materials on topics relevant to health, wellbeing and safety to develop workplace skills and best practice in volunteers, employees, business managers and business owners.

As a **campaigning organisation**, we work to push environmental health further up the public agenda and to promote improvements in environmental and public health policy.

We are a **registered charity** with over 10,500 members across England, Wales and Northern Ireland.

**Julie Barratt**

Cyfarwyddwr yng Nghymru  
Sefydliad Siartredig Iechyd yr Amgylchedd

Cwrt Glanllyn  
Parc Llantarnam

**Julie Barratt**

Director of CIEH Wales  
Chartered Institute of Environmental Health

Lakeside Court  
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The Chartered Institute of Environmental Health (CIEH) is pleased to provide a response to the National Assembly for Wales Petitions Committee Call for Evidence in the matter of waste disposal.

### Petition

*We call upon the National Assembly to urge the Welsh Government to review*  
*1. Prosiect Gwyrdd, which is against WAG policy of localised facilities, and allow our councils to choose their own waste technology and waste management procurement;*

*2. The flawed Wales waste survey that only gave people a 2 choice option on waste disposal;*

*3. By 2020, make it illegal to burn recyclable waste which would promote councils to recycle.*

We make no comment on the first two numbered point of the Petition, neither of these being matters within the remit of CIEH.

Petition Point 3 The CIEH has consistently maintained<sup>i</sup> that the waste strategy to be adopted for Wales should be tiered, starting with reduction in the use of packaging materials, followed by recycling and composting as much waste material as can be recycled or composted and looking at final incineration or disposal to landfill as the final and least desirable option.

We do not however accept that the restriction suggested in this point would necessarily increase recycling. We would not welcome any restriction that may cause treatment of waste to be avoided, e.g. by shipping abroad for treatment waste material which could potentially be recycled and generating a greater carbon footprint for the waste than would be generated by treating it closer to source.

We support the principle of not burning or otherwise 'destroying' potentially recyclable waste, we do not consider that it is appropriate lay down restrictions on such as the one suggested until we can be satisfied that the technology is available locally to recover and reuse all elements of recyclable material.

Specific questions.

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

CIEH is of the view that incineration or gasification are the best methods currently available, particularly where the heat generated by the processes can be used, thereby reducing use of fossil fuels. If incineration is used we suggest that the ash generated should be used as construction material to maximise the use of the end waste product.

CIEH produced a response to the Prosiect Gwrydd Joint Scrutiny Panel: Call for Evidence<sup>ii</sup> in which we argued that incineration of waste when controlled by the current statutory framework does not pose a risk to human health or to the environment, we support gasification for the same reasons.

For the reasons outlined in our response to Petition Point 3 we consider that treatment of non-recyclable waste should be as close as practicable to the source of generation. It is not acceptable in climate change reduction or moral terms to ship waste abroad for treatment and we further add that shipping waste long distances within the UK is not desirable. Local treatment for local waste should be the ultimate ambition.

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

CIEH considers that the advantage of incineration lies in its disposal of non-recyclable waste to ash, which has potential uses in the construction industry, and with side generation of heat which can be used in place of heat generated from combustion of fossil fuel. It is our contention that the combination of the controls put in place by the Environmental Permitting (EP) (England and Wales) Regulations 2007 and advances in emission control and screening technology in modern incineration facilities are such that no significant risk is posed with either to human health or to the environment through the operation of such facilities. We also point to the advantages of a local incinerator facility in cutting the need for transportation of waste by road over long distances.

In terms of the local economy a local incinerator plant generates the need for skilled and unskilled jobs which inject cash into and boost local economies. There is also a positive contribution to be played if heat generated by incineration can be used either to support Community Housing Schemes, providing a cheap source of domestic heating, or alternatively as a heat source for use by other associated commercial ventures, e.g. horticulture.

## **3. 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?**

We strongly support collaboration between local authorities on waste policy. Many of the local authorities in Wales, and particularly in the South Wales valleys are relatively small, and generate relatively small amounts of waste. In the larger council areas of mid and west Wales communities are small and can be far flung. Large facilities such as incinerators or gasification plants can only be economically viable if they are assured of large volumes of waste, and private sector investors are unlikely to support such ventures if there is no realistic prospect of consistent high volumes of waste being forthcoming. Given the investment necessary to establish such

facilities it is unlikely in our view that investors would be attracted to small scale local ventures, looking instead to larger facilities drawing in waste from a wider area.

By working collaboratively local authorities can save capital expenditure of e.g. waste collection vehicles. They can rationalise waste collection routes when not constricted by administrative boundaries, thereby saving fuel. It is further the case that a collaboration of local authorities will be able to guarantee larger volumes of waste and therefore negotiate better prices with the ultimate disposer than several local authorities acting independently.

We trust that the foregoing will assist the Petitions Committee in its deliberations and would be happy to provide such other information or assistance as may be considered to be necessary.

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<sup>i</sup> CIEH responses to Consultation on the Introduction of Restrictions on the Landfilling of Certain Wastes April 2010 and to the Consultation on the Climate Change Strategy Plan for Action in September 2009

<sup>ii</sup> Prosiect Gwrydd Joint Scrutiny Panel: Call for Evidence – Damage to Human Health and the Environment from the Incineration of Waste –Chartered Institute of Environmental Health Nov 2011