



Councillor David Munro,  
County Hall,  
Penrhyn Road,  
Kingston Upon Thames,  
Surrey, KT1 2DN

15<sup>th</sup> October 2006

Dear Councillor Munro,

### **Joint Municipal Waste Management Strategy.**

This reply to your letter of 10<sup>th</sup> October 2006 has been forwarded to all County, District and Borough councillors.

GAIN has reached different conclusions to yours concerning the best way to treat residual waste but we have always been mindful of our responsibility to be accurate in what we say. We believe we have contributed in a positive manner to the waste debate and your incorrect assertion that we have been inaccurate in our recent letter must be challenged.

### **Incinerator Emissions**

At the SCC Environment and Economy hearings earlier in the year Dr Mark Broomfield, one of the authors of the Defra report 'Health Risks of Waste Management Facilities', speaking in his capacity as an Enviro consultant, listed a range of substances emitted from MSW waste to energy facilities (incinerators):-

**Nitrogen Oxides, Particulates, Sulphur Dioxide, Hydrogen Chloride, Volatile Organic Compounds, Cadmium, Nickel, Arsenic, Mercury, Dioxins and Furans \***

We would also point out that in their Sustainability Appraisal of September 2005, ERM stated that incineration was "a poor performer in terms of the likely impact on air quality and potentially also on biodiversity". They also noted that "The air quality standard for nitrogen dioxide (NO<sub>2</sub>) is exceeded in some areas of the county, and the standard for nitrogen oxides (NO<sub>x</sub>) is exceeded across large areas". \*\*

In your letter you acknowledge that there are air quality problems in Surrey – why make them worse.

\* Memorandum submitted to the SCC Environment and Economy Select Committee from Dr Mark Broomfield Technical Director Enviro Consulting

\*\* from the SCC sponsored Sustainability Appraisal September 2005 – Environmental Resources Management Ltd

### **Incinerator Ash**

We note from a SITA report on the operation of their Isle of Man incinerator that:-

*"The EfW process reduces the volume of waste by 90 per cent, leaving a residue to be dealt with. For every 100 tonnes of waste incinerated, about 25 tonnes of bottom ash and three tonnes of air pollution control residues (or fly-ash) are produced."* \*\*\*

Using these figures, incinerating 270,000 tonnes of waste in Surrey each year, as proposed in the JMWMS will produce 67,500 tonnes of bottom ash and 8,100 tonnes of fly ash.

\*\*\* SITA Isle of Man Annual Public Report 2004-5

## Energy from Waste

SCC consultants, Dialogue by Design, report that many respondents to the SLGA consultation do not know about the biological treatment of waste. Given this finding, it is unlikely that they know that the term 'energy from waste' is just as applicable to biological treatment as it is to incineration.

Combining mechanical and biological treatments is common in Europe and, as referred to in our previous letter, is increasingly being adopted in the UK.

A recent article reported the success of the anaerobic digestion plant operated by Greenfinch Ltd in Shropshire. This plant, which takes in 15,000 tonnes of waste, is producing electricity from biogas and is giving a strong economic return, providing £300,000 worth of renewable energy at current electricity prices. \*\*\*\*

\*\*\*\* Lets Recycle article 28<sup>th</sup> September 2006 - Michael Chesshire Director of Greenfinch Ltd

## Public Opinion

SCC has conducted a series of separate waste consultation exercises over recent years. Inevitably, some residents will have responded to more than one of these consultations. However, in each consultation residents have overwhelmingly rejected incineration with more than 85,000 objections in total. This remarkable total represents a substantial and consistently high level of opposition to incineration.

As you are well aware, we fully support action to get polluting biodegradable waste out of landfill as quickly as possible.

We note that the majority of JMWMS consultees express the opinion that the 'Environmental Impact' of a residual waste treatment process is of paramount importance. Our proposals recognize and reflect this concern.

GAIN supports the JMWMS aims of minimising, reducing, reusing and recycling waste. Incineration will continue to be a contentious issue that can only hamper our progress.

Yours sincerely

Colin Matthews  
Chairman – GAIN