

Belfast Friends of the Earth
40 Wellington Park
Belfast
BT9 6DN
Tel: 202240

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Dear *SW*

As a member of Belfast City Council, we ask you to examine the information presented in this letter and lend your support to our campaign against the proposal by N.I.G.E.N (Northern Ireland Generators) to convert the present coal-fired Belfast West power station into a municipal waste incinerator for the Greater Belfast area. This proposal has raised grave concerns about the possible effects on the health and environment of the people of Belfast.

The emergence of incineration as an accepted method of waste disposal is not based on scientific proof that incinerators are harmless to public health and the environment but on the myth that incineration makes waste disappear. Incineration puts your future health and environment at risk, and is part of the problem, not the solution. Belfast already has very poor air quality, the worst in the UK and emissions from an incinerator will exacerbate what is already a bad situation. Analysis of Government monitoring data for last year has shown that particulate pollution levels exceeded the Government's proposed health standard on 127 days, more than 1 in 3. This type of air pollution has been linked to increases in asthma rates in children and various cancers. Air pollution knows no boundaries and the emissions from an incinerator in the centre of Belfast may affect areas up to 30km away from the plant. These emissions are detrimental to both human health and wildlife, and emission standards are based on what is achievable using the best available technology not entailing excessive cost and not on the health implications of exposure levels.

The pollutants which are of particular concern have no safe exposure levels. Particulates, especially PM10's (particulate matter less than 10 micrometers in diameter) have been associated with exacerbation of chronic lung and heart diseases, promotion of asthma, eczema, hay fever and increased risk of lung cancer. Other pollutants from the incineration process will also condense on these particulates. Of particular concern are Dioxins produced during the incineration process. Dioxins have been described as the most toxic substances known to mankind and exposure causes cancer and has been related to reduced sperm production, suppression of immune responses, endometriosis (thickening of the womb lining causing heavy and painful periods) and diabetes. Dioxins accumulate in the body tissues and can be passed from mother to developing foetus causing neurological defects and via breast milk after birth. The Royal Commission on Environmental Pollution (1993), the Governments own scientific advisory body, reported that an infants present daily intake of Dioxins in breast milk is ten times higher than the WHO (World Health Organisation) green dividends recommended level. Emission standards have been set for Dioxins but there is major uncertainty whether concentrations can be measured with sufficient confidence at these low levels to confirm compliance to standards.

Incineration will not solve the problem of waste disposal, it produces approximately 1 tonne of toxic ash for every 3 tonnes of waste, and only reduces the final volume of material requiring final disposal by only 45%. The current regulatory regime for disposal of toxic incinerator ash is inadequate to protect public health and the environment, and incineration can increase the likelihood of pollutants leaching from the ash, in particular heavy metals which will also accumulate on the surface of water and soil near the incinerator. The toxicity of fly ash (ash

trapped before going up the stack) means that expensive, contained monofill landfill sites must be found for its final disposal. Incineration really means incineration and landfill, and Belfast City Council will still have to find new landfill sites. The existing landfill tax of £7/T will almost certainly be increased over the next few years and the increased costs of disposing of the residual wastes from incineration will increase the costs to the council.

Waste to energy incinerators are very expensive to build and therefore require long-term contracts to be economical, usually 20-25 years. This would lock the Greater Belfast area into waste to energy incineration at the expense of more environmentally alternatives for the next 25-30 years. Incineration is a very inefficient and polluting process and to be economical, incinerators need to burn minimum tonnages of waste. This will limit Belfast City Council's attempts to work towards future waste minimisation/ recycling initiatives. An example of this has occurred in Cleveland where the Council has been penalised £147,000 by the operator of an incinerator because of a 'shortfall' of waste during the first year of a contract. In effect, councils may have to abandon plans to minimise waste because the incineration contract forces them to maximise waste going to the incinerator or face financial penalties. This is in direct conflict with UK and European Community policy on sustainable waste management, which places the highest priority on reducing the quantities of waste produced.

Energy recovery is quoted as a benefit of incineration, however recycling material results in a far greater energy saving and reduces the demand for raw materials. Due to the inefficiency of the electricity generating process, only 23% of the energy produced by an incinerator becomes electricity. If all the domestic waste produced in the UK were to be incinerated, the energy generated would be about the same as that produced in a single medium-to-large coal fired power station.

The incinerator will only have a short positive impact on employment, in the construction and operation of the plant. Research carried out by the European Commission and in the US has concluded that separation of materials for recycling is the best option in terms of increasing employment. The number of jobs produced per 1 million tons of waste processed in New York City are 100-290 using incineration and 400-590 with recycling facilities. All things considered, incineration is not the cheap option it appears to be and costs will rise with the proposed EC Directive on non-hazardous waste, which will tighten emission standards further.

The proposed site of the incinerator in the docklands has also raised the issue of importing waste. If the waste from the Greater Belfast area does not fulfill the handling capacity of the plant, will they import waste, making profits for N.I.G.E.N. and more toxic emissions for us?

At the present time planning permission has not yet been granted for the incinerator. Friends of the Earth has objected to the proposal and a public enquiry will take place on the 8 April. Incineration is not the way forward as toxic emissions will not only affect the present population but future generations as well. This proposal must not be granted planning permission. A comprehensive waste reduction, recycling and reuse scheme is the best option for our health and for increasing employment.

Waste management is an issue which has not received adequate attention in Northern Ireland and standards lag far behind those in the rest of the UK, and this has resulted in a generally lower standard of waste management practise. In 1990 the House of Commons Environment Committee visited Northern Ireland in order to assess the standards of environmental protection and management. In the field of waste management the committee concluded "Standards of waste disposal in Northern Ireland are very low - probably lower than in Great Britain". The committee also expressed concern at the environmental impact of land filling wastes in Northern Ireland which is greater than for similar sized areas in other parts of the UK. One of the main factors involved is delay in the implementation of legislation. The Royal Commission report expressed concern at what it described as "Disparities between the substance

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of environmental law in Northern Ireland and the rest of the UK.”

Government policy is that there should be no difference in environmental standards between Northern Ireland and the rest of the UK. However, with respect to waste management, the delays in introducing legislation into Northern Ireland which has already been implemented in the rest of the UK appears to be worsening. Legislation to raise the standards of waste management and oblige local authorities to produce recycling plans (The Environmental Protection Act) was introduced in Britain in 1990. Draft proposals were released by the DOE (NI) in January 1996 but Northern Ireland still has not received this legislation. Under the Environmental Protection Act (1990) ‘...local authorities, in their role as waste disposal authorities, are not required to accept the lowest tender for their contracts where an alternative offers environmental benefits...’ Legislation like this allows movement away from environmentally damaging practices such as incineration to sustainable waste management.

Belfast City Council should adopt the following waste policy before considering incineration. There is a clear hierarchy for dealing with waste:

1. REDUCE the amount produced in the first place (waste minimisation)
2. REUSE goods and materials (repair schemes, cleaning and refilling containers)
3. RECYCLE materials (e.g. bottle and can banks, composting and anaerobic digestion)
4. DISPOSE (landfill and incineration)

This strategy minimises the environmental damage of waste while maximising employment opportunities and economic recovery. At the present time we dispose of over 97% of our household waste directly to landfill, and the recycling rate is a very poor 3%.

There has been a global move away from municipal waste incineration. In Wales, after their own independent investigations the Welsh Select Affairs Committee determined that no more incinerators should be built in residential areas and in the US, the Californian Clean Air Resources Board has placed a moratorium on the construction of all new incinerators in the state. This is an opportunity for Belfast City Council to take the initiative and develop a far sighted sustainable waste management strategy which sets an example to the rest of Northern Ireland. As members of Belfast City Council you have a responsibility to the people of Belfast, future generations and yourselves to ensure that their environment is as healthy as possible. It is within your power to prevent this incinerator by choosing to support this campaign and not granting the waste disposal contract to N.I.G.E.N. who will dispose of the waste via such an inefficient and environmentally damaging process. Bearing in mind Belfast City Councils’ commitments to Local Agenda 21 it is time for truly sustainable waste management and realisation of the wider benefits of waste minimisation and more imaginative ways of dealing with the remaining waste. Don’t let our future go up in smoke - say no to incineration!

For further information contact:

Cathy Maguire, Campaign coordinator.

Marietta Campbell, Admin coordinator.

Andy Orr, Campaigns assistant.