

**PETITION 05-908 - CF3 against the Incinerator**  
**UPDATE TO THE PETITIONS COMMITTEE MEETING Tuesday 7<sup>th</sup> July 2020**

**SUMMARY**

Since the launch, in August 2019, of Mor Hafren Bio Power's proposal to build a 200,000 tonnes per annum waste incinerator, we have seen over 3,000 of the community register their interest and strong objections via our social media platform (Facebook – Residents against the CF3 Incinerator).

This petition, signed by 2,224 concerned residents, is a tangible output from our campaign to stop this facility being imposed on our community.

We have strong support to stop this facility being granted planning permission from our ward representatives at the Welsh Assembly, UK Parliament and Cardiff Council.

Mor Hafren Bio Power's proposal is a private business funded project, which exploits and "drives a coach and horses through" current regulatory or policy gaps in the areas of public health, air quality, waste management and energy policies, generating income from available government subsidies, without paying the full costs of the impact of their activities on society.

We understand the Welsh Government's strategic direction towards a zero carbon and zero waste Wales as set out in "Prosperity for All: A Low Carbon Wales" and "Beyond Recycling":

- Cutting emissions and increasing efficiency in a way that maximises wider benefits for Wales, ensuring a fairer and healthier society.
- Introducing a new circular economy strategy to deliver zero waste by 2050.

These two key strategies are interdependent and work "hand in hand" to deliver their goals and ambitions.

Contrary to Welsh Government's chosen strategic direction (zero carbon and zero waste) Mor Hafren continues to promote their waste incineration proposal as supportive of Welsh Government's strategic direction despite the very obvious disconnects and enormous gulf between them.

Incinerators emit large quantities of CO<sub>2</sub>, roughly one tonne of CO<sub>2</sub> for every tonne incinerated.

If this is the case Mor Hafren's waste incinerator will emit approximately 200,000 tonnes of CO<sub>2</sub> per annum.

Their proposal makes no reference to this fact.

We therefore request that this petition be sent to the Senedd asking for action on regulatory or policy changes that will ensure:

1. All waste incineration planning proposals demonstrate compliance with Welsh Government's zero carbon and zero waste ambitions, e.g.
  - a) Employment of Carbon Capture technology, reducing CO<sub>2</sub> emissions, in line with the 2030 Welsh Government's Carbon budget,
  - b) Declare and certify the greenhouse gas emissions emitted by the incinerated fuel stock.
2. Any future investment in waste management infrastructure in Wales is directed towards waste recycling facilities, not waste incineration or energy recovery from residual waste incineration.
3. A moratorium is brought in, whilst the zero carbon and zero waste regulatory and policy changes are made and brought into effect.

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**THOUGHTS**

These are our thoughts on the additional documents and other supporting evidence we present for the Petition's Committee's consideration.

- 1 We fully concur with the response from Welsh Minister, Hannah Blythyn, in particular the following:

*“As a responsible nation, it is vital that we take responsibility for the disposal of the waste that we generate that cannot be recycled. For this reason, we have invested in the infrastructure to extract electricity and heat from this material and dispose of it safely to the highest environmental standards and in line with the waste hierarchy. This not only ensures that we can extract the maximum benefit from this waste, but also prevents it from becoming a problem elsewhere.*

*The incineration of waste for heat and power is, however, a transitional step. The long-term solution is to keep resources in use for longer and reduce all waste. We have recently consulted on our new circular economy strategy, Beyond Recycling, which aims to keep resources in use for as long as possible and continue our progress towards zero waste by 2050. This also plays a key role in our efforts to tackle climate change as research from the Ellen MacArthur Foundation identified that 45% of emissions come from the goods and products, we use every day”.*

This evidence clearly demonstrates the Welsh Government's strategic direction and that they have already invested in the infrastructure to dispose of the waste that is generated and cannot be recycled.

- 2 Mor Hafren's response states: *“ Within Wales, after all recycling activity there is still 1.6 million tonnes of residual waste (700,000 tonnes of household and 900,000 tonnes of commercial and industrial (C&I)) left each year – this is either treated or landfilled.”*

They go on to say:

*“The proposed Môr Hafren Bio Power facility is intended to help fill part of this gap by diverting up to 200,000 tonnes, of mainly commercial and industrial residual wastes”.*

We have been unable to validate or confirm with NRW Mor Hafren's residual waste figures. Our landfill figures, due to the high recycling rate in Wales, are significantly lower than claimed by Mor Hafren, who also state elsewhere they will only receive waste collected within a 30-mile radius of the site.

We do not accept Mor Hafren's justification of a need based on national figures and there is no data or evidence of the residual waste arising within a 30-mile radius of the site.

Our research identified **a total of 1.23M tonnes of waste incineration capacity** in the permitted waste incineration infrastructure in Wales.

The breakdown by region is as follows:

South East Wales = **511,400 tonnes per annum**

South West Wales = **520,000 tonnes per annum**

North Wales = **200,000 tonnes per annum**

We would like the Petition's Committee to be aware there is already over capacity of waste incineration infrastructure, of nearly **6M tonnes**, across the UK.

The reported figures for 2019 show an operational capacity of **15.4M tonnes** and a further **3.1M tonnes** capacity in construction, giving a potential total capacity of **18.5M tonnes**. The reported input tonnage to these waste incineration plants in 2019 was **12.6M tonnes**, or only 89% of the available capacity.

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**ADDRESS THE ISSUES**

- 1 NO.  
Mor Hafren's response to the Petitions Committee document makes no concessions or significant changes to their proposal or design. It has not addressed our issues or significant concerns.
- Their chosen location for their facility remains in very close proximity to several densely populated residential areas and schools. The documents referred to in their Emissions section link to a 2013 document, which makes numerous references to "polluting substances".
  - They continue to reference emission of greenhouse gases from landfill contrary to the Welsh Government's strategic direction, which is to reduce greenhouse waste emissions from landfill.
  - Their chosen waste incineration technology does not employ Carbon Capture technology, which is a significant divergence from the strategic direction towards a zero carbon Wales

Mor Hafren as a private company, seeks investment from investment funds many of which seek to invest in ethical or green investments.

They are at pains to highlight their project's "green credentials" and portray them as ethically acceptable.

No mention is ever made of the unpaid cost to society from fossil CO2 released by UK incinerators, which was estimated to be **£453M** in 2019.

Incinerators emit large quantities of CO2, roughly one tonne of CO2 for every tonne incinerated. About half of this CO2 derives from fossil sources such as plastic.

Mor Hafren's plant will emit approximately **200,000 tonnes of CO2 per annum**.

In June 2011 Defra acknowledged (in their Economics of Waste and Waste Policy publication) that incinerators were "creating GHG emissions without paying the relevant price". Unlike power stations, waste incinerators are not part of the Emissions Trading Scheme.

Mor Hafren have undertaken numerous reports (Health Impact, Traffic, Air Quality and Ecological), which repeatedly state "negligible" or insignificant" in their assessments and conclusions. In our opinion it is completely unacceptable to misrepresent the impact this proposed waste incineration facility will have on the community and residents as neither "negligible" nor "insignificant" equate to "none" in our understanding.

These "greenwashing" reports attempt to demonstrate compliance with outdated regulations, struggling to keep pace with the climate change agenda, against the gold rush of private companies, looking to make a profit whilst avoiding having to pay the full costs to society.

For the safety of the communities and residents that the Assembly is responsible for, this proposal should be deferred until the Welsh Assembly has agreed what legislation they need to bring into force to ensure the delivery of their chosen strategic direction towards a zero carbon and zero waste Wales.

**QUESTIONS**

- 1 Is this an ethical proposal that supports the Welsh Government's strategic direction (zero carbon and zero waste)?
- 2 Does the Welsh Government need to mandate Carbon Capture technology for new waste incineration proposals to meet their 2030 Carbon budget?
- 3 Does the Welsh Government need to mandate a declaration and/or certification of the CO2 emissions that new waste incineration proposals will produce in order to ensure they meet their 2030 Carbon budget?
- 4 Does the Welsh Government need to declare a moratorium on applications for waste incineration permits, whilst their work is underway, with NRW, to bring in the necessary regulatory changes, to deliver their chosen strategic directions, zero carbon and zero waste?