

Councillor Christine Stevens
SLGA Waste Strategy
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Thornton Heath
CR7 7XT

Name.....
Address.....
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Date.....

Dear Cllr Stevens

BIOLOGICAL BREAKDOWN: BETTER THAN BURNING

This letter is my response to the Joint Municipal Waste Management Strategy (JMWMS) consultation.

I note with very great interest that it is possible to deal with Surrey's waste remaining after 60% recycling and composting in a way that:

- avoids incineration or other combustion
- meets targets and leaves flexibility for future progress
- fares well in cost and environmental assessments
- generates energy and
- enjoys the support of several Districts and Boroughs in Surrey.

I call on Surrey to pursue an incinerator-free approach and support GAIN's incinerator-free hybrid option, involving biological breakdown of waste remaining after minimisation, recycling and composting.

I ask Surrey County Council to drop its plans to build two incinerators by 2009 and to develop instead two facilities based on Anaerobic Digestion by 2010-11 (with gas used for energy and residue cleaned and bio-stabilized).

I also ask for:

- county-wide kerbside collections of separated materials for recycling, including food waste
- civic amenity sites to be upgraded as recycling centres
- local in-vessel compost facilities using food and garden waste to produce premium compost and energy from gas
- incentives for separating waste and reducing the amount produced
- a recycling and composting target of 60% by 2010/11 (Slyfield is achieving 60%) and
- a target to level off residual waste at no more than 260,000 tonnes by 2016
- an end to all untreated, unsorted landfill but greater scope for cleaned, bio-stable landfill

The public has taken the trouble to submit over 85,000 objections to incineration in Surrey and strongly supported feasible incinerator-free approaches. I am delighted that some Surrey Districts and Boroughs support an incinerator-free strategy. Partnership with residents, who would be motivated by an undertaking to avoid incineration, is surely the best way to meet waste targets and to avoid paying penalties for sending dirty, unsorted waste to landfill.

The questionnaire uses the word incineration (albeit dressed up as energy recovery), recognizes that this technology has a poor reputation with some people, and acknowledges that some authorities would prefer to see biological breakdown of waste instead of burning. In these respects the questionnaire is more open than previous consultations. However, in the previous JMWMS consultation in 2003 residents were offered an incinerator-free option (option h) which they overwhelmingly supported. It is wholly unacceptable that Surrey CC, as Disposal Authority, is not offering a worked up incinerator-free option this time, especially given the feasibility of such an approach. I cannot support a plan which commits to providing waste treatment facilities without saying what they would be, when I know the County's preferred option is incinerators.

I am deeply concerned that anyone relying on the current questionnaire will not realize that Surrey County Council plans to:

- burn most of Surrey's waste out of the county for the next few years, then
- burn 44%, and later 40%, of our waste in two Surrey incinerators as soon as they are built.

Crucially, they will not realize that the County Council sees this questionnaire as the last public consultation hurdle before pressing ahead with applications for two incinerators via its waste contractor, SITA UK.

The public should be:

- alerted that the key issue to be resolved in this JMWMS consultation is whether the community endorses Surrey CC's plan to build two incinerators or would prefer an alternative approach
- invited to comment on Surrey's Waste Disposal Plan to burn our residual waste,
- informed that Surrey considered six residual waste options involving burning waste but did not consider one incinerator-free option that included harnessing energy from gas, and
- made aware that incineration does not come out as the best option in assessments.

I am concerned that Surrey seems to be going to great lengths to try to marginalize the responses of residents who take the trouble to respond to waste consultations. I note with interest that the Government's guidance on Waste Strategies advises:

- Engagement with the local community should be an important and integral part of the decision making process
- Authorities should engage the local community innovatively and actively at an early stage.
- Appropriate consultation should be continued throughout the Strategy development process.
- Strategies should reflect both community aspirations and ensure cost-effective compliance.

Surrey County Council's approach of promoting only incineration does not inspire confidence that genuine partnership with the community is sought.

Please enter the following answers from me under the appropriate questions in the questionnaire:
I would like to sign up to the Surrey waste minimisation pledge.

Q1. The 3 most important factors that would allow me to contribute to waste minimisation are:

- Information,
- Incentives,
- Other (less packaging on products designed to last, be updated or be repaired)

Q2. The 3 following facilities would most assist me to increase my recycling and composting efforts:

- Improved recycling facilities at Civic Amenity Sites
- Improving range of materials collected at kerbside
- Other (packaging and products designed to be recycled or composted)

Q4. The 3 most important criteria in determining the process used to treat residual waste are:

- Other (avoid combustion impacts)
- Other (health and environmental impacts and risks)
- Other (flexibility to recover more materials over time, rather than burning them)

Q5. My comments on the best way to deal with waste left over from minimisation, recycling and composting are:

Biological breakdown not burning.

I support GAIN's **incinerator-free** hybrid option: Anaerobic Digestion with Energy from Gas, and potentially Autoclave, with residue cleaned and bio-stabilized.

I do not support Surrey County Council's draft Waste Disposal Plan.

I support the Boroughs and Districts that are working for an incinerator- free approach.

Yours sincerely