

To:- Caroline Tapster, Chief Executive Herts County Council.

COMPLAINT ABOUT ARTICLE IN “HORIZONS”, published by Herts County Council, Winter 2010

An article entitled “The Future of Hertfordshire’s Waste” was printed in the Winter 2010 edition of the Herts County Council magazine, “Horizons,” on page 17.

We are lodging a formal complaint about the article because it does not follow the “Code of Recommended Practice on Local Authority Publicity.”

Code of Recommended Practice

Point 16 of the Code states “Publicity touching on issues that are controversial, or on which there are arguments for and against the views or policies of the council is unavoidable, particularly given the importance of wide consultation whenever material issues arise. Such publicity should be handled with particular care. *Issues must be presented clearly, fairly and as simply as possible, although councils should not over-simplify facts, issues or arguments.*”

Point 26 of the Code states “Local authority newspapers or information bulletins are a special case. They are often a cost-effective means of dissemination information, or facilitating consultation, and can provide a means for local people to debate on decisions the council is to take. ...Inevitably such publications will touch on controversial issues, and where they do *they should treat such issues in an objective and informative way*, bearing in mind the principles set out in paragraphs 11-19 of the Code.

Point 27 of the Code states “Where it is important for information to reach a particular target audience, consideration should be given to using the communications networks of other bodies, for example those of voluntary organisations....”

The article on Page 17 of the Winter 2010 edition of “Horizons” fails to follow this Code in a number of ways.

1. The article juxtaposes the statement that its priority is to help residents reduce, re-use and recycle more of their waste, with a large picture of the incinerator. This is blatantly misleading in that the incinerator has nothing to do with helping to reduce or recycle waste and in fact will prevent high levels of recycling and composting by burning around half of the county’s municipal waste and will remove the incentive to reduce waste because potentially recyclable/compostable waste is needed to fuel it.

2. The diagram indicates that “Water vapour and clean flue gases” leave the chimney of the incinerator.

This statement is misleading and not objective or accurate. The flue gases include large

amounts of carbon dioxide and oxides of nitrogen, both potent greenhouse gases. The latter responsible for low-level ozone formation which is damaging to health. The flue emissions also contain acid gases such as hydrogen chloride, hydrogen fluoride, and sulphur dioxide, which contribute to acid rain. In addition they carry trillions of fine and ultrafine particles (pm2.5s and nano-particles) coated with dioxins, furans, PCBs and heavy metals, which are not removed by the scrubbing equipment. The flue gas pollutant levels are measured by the operators intermittently, and published figures show the presence of pollutants thus they are demonstrably not 'clean.' Whether or not they are 'safe' is controversial.

3. The diagram indicates that "Bottom ash" is all sent for recycling. This is not objective or fully informative, as the bottom ash cannot easily be recycled, containing as it does heavy metals, dioxins, furans, PCBs and other pollutants, and has a high pH which has caused problems when used as aggregate. Thus it may have to go to landfill. Further, there is no mention at all of the toxic fly ash, which has to go to a special landfill site for hazardous waste.

4. The article states "Today's technology makes this one of the cleanest forms of energy generation."

That is patently untrue. Incinerator emissions are dirtier than all renewable energy sources including methane from AD, and even from gas-fired power stations.

5. The article states in the first paragraph that "it is simply not practical to recycle all waste" without making it clear that studies done by the US Environment Protection Agency and for the Welsh Assembly both show that over 90% of MSW waste is potentially recyclable/compostable. It goes on to say that "the best thing to do with the waste remaining after recycling is to use it to generate energy."

This is a highly controversial and not objective or fully informative statement. If 70 to 80% of Herts MSW and commercial and industrial waste was recycled/composted an incinerator of the type shown in the article would not be necessary or economic. There is no mention of the advantages of using anaerobic digestion (a much cheaper safer, more efficient, and environmentally-benign way to deal with biodegradable waste) to generate methane which can be injected into the gas grid, yielding more energy than can be 'recovered' by the incinerator illustrated.

Many waste experts are now recommending a target of eventual zero waste, and there is good evidence from authoritative sources that *recycling saves up to 46 times more energy than can be generated by burning the waste in an energy-from-waste incinerator* (AEA 2002).

6. The article states in the second paragraph that "energy from waste has been identified as the best way for Herts to deal with this waste in an environmentally, economically and socially sustainable and safe manner."

This statement is highly contentious and not supported by the evidence presented by many authorities. This is made even more controversial by the fact that the Public Consultation

on the Waste Core Strategy giving preference to energy-from-waste *was still in progress*. There is well supported evidence that incineration is not environmentally sound or sustainable and safe, as it releases large volumes of greenhouse gases, thus exacerbating climate change. It also emits pollutants to air and ground that are dangerous to health. The large-scale plant required for an incinerator creates a massive impact focussed on one community, particularly in traffic noise, fumes and congestion.

It is not an objective and informative point that incineration is economically sustainable. By burning the materials which could be recycled (again a point not made in the article) it perpetuates the need to use virgin resources mainly from abroad. It also requires oil-based products, such as plastic, to burn. Jobs generated are few compared to recycling and composting and the money generated leaves the local economy, whereas recycling and composting activities encourage local businesses. The long term costs of incineration are significantly greater than increased recycling combined with more modern and benign methods such as MBT and AD.

7. The article states in the fifth paragraph that the EfW facility will “help us to divert the maximum amount of waste from landfill.” It does not mention that a minimum of 11,000 tonnes per year of hazardous fly ash will be landfilled, and that as much as 70,000 tonnes per year of bottom ash may well have to be landfilled too. *A zero-waste policy over a 25 year period will divert as much or more waste from landfill at a fraction of the cost.*

8. The article also states in the fifth paragraph that “it will save the county council around £544m pounds over 25 years.”

This is not objective and is misleading, because it does not state to what the saving is being compared. We believe that it is compared to the costs of current levels of landfill, which of course is a misleading comparison in that no one is suggesting that as an option. There is no comparison with the cost of high levels of recycling and use of flexible low-cost technology such as MBT and AD to divert waste from landfill and generate energy. To be objective the comparison should have been with reference to a zero-waste plan or at least the sort of alternative that Surrey County Council or Lancashire CC are pursuing.

9. The article, in the last paragraph, mentions “energy produced from renewable technologies, such as wind and solar power” with the implication that an incinerator is also producing renewable energy. This is highly misleading in that a significant proportion of the energy has to come from plastics because of the low calorific value of the bio-degradable waste.

In view of point 26 in the Code of practice regarding public consultations we find it unacceptable that although “Horizons” was published and delivered to homes throughout Hertfordshire during the period of Public Consultation on the Waste Strategy (Nov 1<sup>st</sup> to Dec 13<sup>th</sup>, extended to Dec 22<sup>nd</sup>), the article makes no mention of the Public Consultation, and so did not take the opportunity provided by the publication of “Horizons” to inform the

public about the Public Consultation. For example in Hatfield, the only publicity given by Herts CC to indicate that a Public Consultation was running was a short article in the Welwyn/Hatfield Times, which is a newspaper that has to be bought. There was no publicity for the Consultation in the free paper, the Welwyn/Hatfield Review. To see the Consultation documents in either of the Hatfield public libraries, it was necessary to know they existed and to ask for them to be obtained. We suspect that Hatfield was not an exception.

The article gives the impression that Herts CC is more interested in publishing subjective and misleading information geared to its own agenda, than following the Code of Practice.

This Complaint is made by the following organisations:-

Hatfield Against Incineration  
Herts WithOut Waste  
St Albans District Green Party  
North Herts and Stevenage Green Party  
Welwyn Hatfield Green Party  
Burning Issue Group (Ware)  
Transition Welwyn Garden  
Transition Town Letchworth  
Hitchin in Transition  
Triangle Community Garden Group  
North Herts Friends of the Earth