



No Incinerator 4 Horsham Community Group (Ni4H)

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Re: Centre for Horsham Energy Recovery (CHER)
To: Jean-Marc Bouchet, Founder of Qair and
Luc Valaize, Managing Director Waste-to-Energy, Qair

Dear Mr Bouchet and Mr Valaize,

I am contacting you as Chairman of No Incinerator 4 Horsham Community Group (Ni4H).

A strong element of this group's submission to the Planning Appeal in 2019 included evidence that:

- a) there was more waste incineration capacity already built or under construction than it is forecast there will be future combustible waste to burn;
- b) that incineration overcapacity is a barrier to achieving the recycling society; and,
- c) that we should shift the focus of investment away from incineration and towards waste reduction, reuse, and recycling.

Since that time, this policy has been re-enforced by both the Welsh and Scottish Governments having called a halt to further incineration capacity. In March 2021, the Welsh Government announced a moratorium on all energy from waste (EfW) incinerators with a capacity of 10MW or more. In May 2022, the Chair of the Independent Review of Incineration in Scotland recommended a ban on new incineration capacity in Scotland due to the "risk of long-term overcapacity". Then, in June 2022, the Scottish Government announced their acceptance of the Review's recommendations, describing the moratorium on new incineration capacity in Scotland as "an action taken to encourage a circular economy, in which materials were kept in use as long as possible and precious natural resources were not wasted".

Also, in June 2022 the UK Climate Change Committee (CCC) expressed concerns about overcapacity in its Progress Report to the UK Parliament and warned "action is required to avoid an over-reliance or over-capacity of incineration", stating that unchecked growth of incineration could "undermine the sector's contribution to UK emissions targets and efforts".

The projections below show details of the excess incinerator capacity and the reduction in waste in England over the next 20 years that makes the case for a UK-wide moratorium essential now.

In March 2022, the UK Government proposed that one of the environmental targets to be set under the Environment Act was a target for "halving the waste that ends up at landfill or incineration by 2042" relative to a 2019 base year.

This would mean the potential English incinerator feedstock (around 45% from households and 55% from other sources such as Commercial & Industrial waste from businesses) would fall from around 25.4 million tonnes in 2022 to only around 13.4 million tonnes by 2042.*

There is currently 15.6 million tonnes of operational incineration capacity in England, and this is set to increase to 18.9 million tonnes once incinerators that are currently under construction become operational. This combination of increased capacity and reduced feedstock would result in around 5.5 million tonnes of incineration overcapacity in England by 2042 (i.e. 18.9 million tonnes capacity minus 13.4 million tonnes feedstock)*

English incineration overcapacity would be even worse if incinerators that have been granted both planning permission and an environmental permit were to be built. An immediate moratorium that brought an end to the issuance of environmental permits would cap English incineration overcapacity at around 8.5 million tonnes (i.e. 21.9 million tonnes capacity minus 13.4 million tonnes feedstock). Without such a moratorium, incineration capacity in England could grow to more than 30 million tonnes at a time when feedstock is expected to fall to around 13 million tonnes.*

Seeing how incinerator overcapacity may endanger their commitment to the circular economy, both the Wales and Scotland Governments have halted further incineration capacity. The UK Government has clearly set out its intention to move towards a circular economy, and people across the country are writing to ask their MPs to support a ban on new waste incinerators in England, to send a clear signal that they are committed to this transition.

The Climate Change Committee (CCC) has also advised Government that new incinerators “should not be built unless they can demonstrate compatibility with waste treatment capacity needs and the waste hierarchy” and that “Defra should urgently complete and publish an up-to-date assessment of residual waste treatment capacity needs for the UK out to 2050, consistent with committed and proposed targets...”

To achieve the UK Government’s target of halving residual waste by 2042, a massive increase (by as much as 100%) of recycling infrastructure will be required, a requirement already recognised by the UK’s biggest waste operators. If Qair is to invest in the UK’s waste processing sector, we would much prefer to see this investment directed to meet a proven and growing need, instead of disposal infrastructure which will be required to reduce in capacity to meet Government targets and society’s ambitions.

We do not want to see the unintended consequences of a broken market where there is an investment in the overcapacity for burning waste which results in a lack of investment in recycling. We do not want to wake up to see huge redundant facilities that we find out too late have no practical purpose but which, for commercial reasons, have had £100Ms investment made in them in the mistaken belief they would go on burning waste into the 2040s and beyond.

With all these factors in mind, we know you are intending to start work on site clearance at the Horsham waste site in preparation for construction. However, given the current direction of travel for the circular economy policy, state of the market for overcapacity in incinerators, and the significant reduction in combustible feedstock, we are concerned about how an investment of several hundreds of millions of pounds may be risked or justified. Our view

reflects the fragility and continuous decline of this market in the medium term and our understanding of the need for this investment to continue to make a return over the next 30 years. Frankly speaking, the financial viability looks implausible

We do not want to see disruption to our community's quality of life for the three years it takes for construction, and then a need to decommission when the whole process becomes obsolete. Perhaps it would be better to continue to focus on your portfolio of onshore wind and photovoltaic (PV), together with the setting up of the consortium which you have been awarded for two offshore projects in the Scotland. These initiatives are looking positive and we applaud your core strengths of developing renewable energy.

We see that the projected incineration overcapacity comes with both commercial risks for investors and risks to achieving environmental and economic ambitions. There is a strong case that England should now follow Wales and Scotland in saying no to new waste incineration capacity in order to support recycling, decarbonisation, and the circular economy.

We agree with the Ellen MacArthur Foundation, a leading advocate for a more circular economy, supported by many of the world's major corporations, when it rejects incineration as part of a circular economy:

"The first principle of the circular economy is to eliminate waste and pollution. Currently, our economy works in a take-make-waste system. We take raw materials from the Earth, we make products from them, and eventually we throw them away as waste. Much of this waste ends up in landfills or incinerators and is lost. This system cannot work in the long term because the resources on our planet are finite."

Given these facts, we have joined others across the UK in calling for the UK Government to introduce an immediate moratorium on new waste incineration capacity in England.

A ban on new incineration capacity in England is urgently needed to:

- Prevent further exacerbating incineration overcapacity
- Encourage the more efficient use of existing incinerators
- Prevent pollution from harming air and soil quality
- Support the transition towards net zero carbon, and
- Enable a more circular economy, with increased reduction, re-use, and recycling.

It is therefore vital that Government does not allow any planning permissions or environmental permits for new incineration capacity in England until this assessment of residual waste treatment capacity is completed. An immediate moratorium would cap English incineration overcapacity at around 8.5 million tonnes.

I look forward to hearing back from you with your thoughts on the call for an immediate moratorium on new waste incineration capacity in England and would be interested to hear your views on the impact of over-capacity on your business model.

Additionally, and more specifically, in the light of the potential moratorium, it does not appear to make social or economic sense to build and operate the Horsham incinerator. Given there

is, even now, a significant overcapacity forecast, surely investment should be focused on growing the circular economy and developing pollution free renewable energy.

The proposed Horsham incinerator is mentioned in the UKWIN Incineration Overcapacity Briefing and Methodology (September 2022). I enclose copies for your information:

- UKWIN Incineration Overcapacity Briefing
- UKWIN Incineration Capacity Methodology

On behalf of Ni4H, I look forward to hearing your considered thoughts.

Yours sincerely,

Peter Catchpole, Chairman of No Incinerator 4 Horsham Community Group

*These numbers are based on waste and capacity figures produced by Defra and the Environment Agency, which is brought together in modelling, carried out by UKWIN. <https://ukwin.org.uk/overcapacity>