

22.5.08

Dear Binn Farm campaigner

There has been something of a hiatus in activity on the surface, but some frantic paddling below.

We are following three courses of action.

First, we recently found out that back in 2001 the Draft Tayside Area Waste Plan clearly indicated that the option of building another Energy from Waste (EfW) plant (i.e. additional to the existing DERL plant in Dundee) had been rejected, and that the Best Practical Environmental Option (BPEO) was the High Recycling option (see pp25-33 of the attached Draft Tayside Area Waste Plan, or 'Draft Plan' for short). However, this clear rejection of new EfW facilities did not find its way into the final published version of the Tayside Area Waste Plan (also attached). This omission could, at a stretch, be interpreted as leaving the door open for the three Tayside Waste Area authorities (P&K, Dundee and Angus) to opt for new EfW facilities. We have therefore submitted a complaint to Perth & Kinross Council about the omission, with a request that the final published Tayside Area Waste Plan be revised accordingly, and the relevant P&K committees and officers be informed of the changes, and asked to revise their decisions relating to EfW in the light of these changes.

Secondly, we are looking into the cost of the various studies and stakeholder consultations that took place, which led to the rejection of new EfW. As you can see from the attached Draft Plan, a lot of time and effort went into the background preparation of the BPEO, as well as a lot of money employing the services of several agencies and consultancy firms. We are awaiting a breakdown of these costs from SEPA. When we have them we will be able to point out to the Council that after all that time, trouble and expense to arrive at certain findings, it should not then ignore those findings simply because it doesn't suit them.

Thirdly – and this is where you can take some action right now – we have been analysing waste statistics in Perth and Kinross, with a view to challenging the Council's assertion that it needs to incinerate waste in order to avoid European landfill fines. These fines would apply if the Council failed to meet certain targets for reducing the amount of biodegradable municipal waste, a.k.a. 'BMW', that it sends to landfill. Currently organic kitchen waste (i.e. food scraps) comprises 42% of BMW – over 20,000 tonnes each year. Amazingly, the Council is only now collecting just 3 tonnes as part of a 3-month trial. If it collected the bulk of the remainder, there would be no possibility of incurring European landfill fines. These kitchen scraps could then be treated by composting or anaerobic digestion (the latter produces compost and methane for electricity production).\*

Therefore we would ask you to write to your local Councillors and MSPs, pointing out that if Perth and Kinross Council recycled kitchen waste, it simply wouldn't need to build an incinerator (and in any case, BMW has a naturally high moisture content, so that burning it is grossly inefficient and wasteful).

(For more facts and figures, please see ['European Landfill Fines in Perth & Kinross'](#))

Some Councillors argue that we need an incinerator because there will always be some 'residual waste', i.e. waste that cannot be recycled or composted. If they tell you this, you could raise the following points in reply:-

1. As recycling technology improves, more and more products are becoming recyclable, so that they are no longer classified as 'residual waste'.
2. The Scottish Government has promised to greatly improve facilities for recycling, and to reduce the amount of waste currently being produced in the first place.
3. Most of what is currently classed as 'residual waste' is fairly inert, such plastic food packaging, old toys and other redundant household items. Burying relatively small quantities of these things in landfill will not harm the environment. Furthermore as we improve in our ability to 'Reduce, Re-use and Recycle', there will be a steady decline in the quantity of such items.
4. Incineration is very expensive. Western Isles Council found that back in 2001 it would cost around £70-80 per tonne (landfill currently costs around £44 per tonne, rising to around £68 in three years). Furthermore it has been predicted (Peter Jones OBE of Biffa Waste Management) that it is only a matter of time before the European Emissions Trading Scheme is applied to incineration, which will add around £30 to every tonne of waste burnt.

As far as the timetable for the application by SITA to build an EfW plant at Binn Farm is concerned, SEPA says this is still imminent, although they have been saying this for 3 months. I still keep a watchful eye-out in the public notices section of the Perthshire Advertiser, and occasionally ring SEPA to check the situation, but nothing so far.

As far as the legal side of things is going, we have an experience environmental lawyer looking into various types of legal action that can be taken against the incinerator. We'll keep you posted.

Best wishes,



Michael Gallagher, Tayside Environmental Action Group

\*Incidentally – the separate collection of organic kitchen waste has been in operation in the Fairies Road area of Perth for the past two or three years. Householders were given little plastic boxes with lids and handles, and a roll of biodegradable liners. These boxes are placed inside the brown-lidded garden waste bins on collection day. The question is, why has this perfectly adequate system not been rolled out across the whole of Perth & Kinross? (of course not everyone has the brown-lidded bins, but the boxes could just as easily be placed inside the green- or blue-lidded wheelie bins).