

**From:** [REDACTED]  
**Sent:** 12 May 2009 12:05  
**To:** Registry Perth  
**Subject:** Binn Farm incinerator objection

Hi,

I would like to register my objections to the proposed incinerator at Binn Farm in the strongest possible terms. As a father with 3 children under 5 years old I am hugely concerned about the long-term health implications of living in the vicinity of an incinerator. I know the commercial operators of incinerators put out an endless stream of 'research' that try to show that there is no impact on human health, yet there are enough scientific reports of potential health hazards as a result of the fine particulates and chemicals these incinerators indisputably produce to warrant not approving any further such schemes on those grounds alone. For a long time asbestos was considered a perfectly harmless material suitable for use in buildings - yet we now know what terrible long-term effects exposure to it can have. To simply brush aside the reports that do not support the commercial operators' interest in this case would seem to me to be ignoring historical lessons that the asbestos case provides.

One of the main threats facing humanity on a global scale is global warming - so how on earth can we even consider burning yet more rubbish? SEPA's own website at [http://www.sepa.org.uk/climate\\_change.aspx](http://www.sepa.org.uk/climate_change.aspx) states:

"Uncertainties in the scientific understanding of global warming do not warrant a 'wait and see' attitude and there is much that we can do now that makes both environmental and economic sense."

Approval of the proposed incinerator scheme cannot be compatible with this statement. In its attempt to address one environmental problem it is simply creating another and it makes no sense what so ever once the economics are taken into account as incinerators are expensive to run and the cost of the this will need to be met by the public sector and ultimately the council tax payers. I fully realise that the current status quo regarding landfills cannot be maintained, simply dumping rubbish in landfills does not solve anything. Yet incinerators seems to me to simply transfer the problem of pollution from one place where it is visible (the landfills) to where it is mostly invisible (the air). Quite how that can be called progress on environmental protection is beyond me. And how can SEPA retain any credibility for trying to reduce contributors to global warming if it at the same time approves incinerator schemes that directly contributes to further global warming?

If the incinerator route was simply the least environmentally damaging option then so be it, yet there are alternatives such as anaerobic digestion, gasification and plasma gasification which produce far fewer harmful emissions. In addition, many of the materials that will enter the plant could be recycled rather than being burned. So in effect approval of this scheme would send a powerful signal that recycling is a waste of time - hardly the kind of message I believe SEPA should be responsible for.

Even setting aside any logical environmental arguments for why the scheme should not be approved, I fail to see how this scheme can be considered to meet the national guidelines set out by the Scottish Government. It is clearly stated that there should be a 25% limit on the incineration of waste at the regional level - the 3 Tayside authorities combined are already burning around 25% of waste at the DERL incinerator in Dundee so approval of this scheme would be a direct breach of these rules. Furthermore, for any incinerator schemes to even approach the levels of efficiency that should be demanded of such schemes the low-grade waste heat needs to be used for heating nearby properties. Given the proposed location of this plant no such use is possible and the proposed alternative of using the waste heat to grow non-indigenous crops hardly seems like a credible plan. Using crops of

limited value grown in a highly energy inefficient manner hardly seems like a credible justification for the harmful effects of the proposed incinerator scheme.

I further believe that the proposal from SITA is flawed in a number of specific respects. SITA have failed to show how waste such as fly-ash from the plant will be disposed of safely. It has been stated that bottom ash will be used in the construction industry, yet SITA has not provided any evidence that there is sufficient demand for this so-called 'product'. Given the current state of the construction industry I would argue that any such demand if it indeed exists is greatly reduced for the time being. What are the plans for disposing of this waste if it cannot be used by the construction industry? SITA has even failed to produce a detailed list of waste types and amounts of each that will be burned at the proposed plant. How on earth can the environmental impact even be accurately evaluated without detailed knowledge of the input into the proposed plant? What comes out of the plant is functionally dependent on what goes into it in the first place - so I fail to see how a responsible authority can approve any scheme for which it cannot accurately estimate the impact of due to lack of information on the inputs.

A final objection to the proposed scheme is the lack of competence of the operator SITA. The problems of bad smell experienced in Abernethy over a number of years from SITA's existing operations at Binn farm does not bode well for SITA's ability to operate the proposed plant to the required standards. The regulations for monitoring of toxic emissions do not provide any comform either - at the very least the monitoring should be continuous to spot any problems early - 6 monthly monitoring intervals means that the local population can have been exposed to toxic emissions for a very long time before any monitoring picks up on any problems.

So in summary, I strongly believe this proposed scheme should not be approved due to the potential long-term health hazards they probably pose. Incinerators in general do not make any environmental or economic sense and are in direct breach of SEPA's own statements on global warming. This specific scheme does not meet Scottish Government guidelines on incinerators and its location means the required efficiency of such plants cannot be achieved. If SEPA was to support proposals such as this then I cannot see what the point of a governmental agency such as SEPA is - it might as well be rebranded 'Scottish Environment Pollution Agency' as any credibility the organisation has for policing environmental impact would be in tatters.

I would much appreciate if my objection could be acknowledged so I can be sure it has reached the appropriate agency and will be taken into account.

Kind regards,

  
Aberargie  
