PO Box 173 Bangalow
NSW 2479 Australia
info@ntn.org.au

www.ntn.org.au

Working globally for a toxic free future

Australia's waste recycling crisis

National Toxics Network Open Letter
Federal Minister for the Environment, the Hon Josh Frydenberg, and
Australian State Environment Ministers.
24th April 2018

Dear Ministers,

This week you will be meeting at the COAG to discuss the 'Australian waste recycling crisis'.

The National Toxics Network, Australia's peak toxics and environmental justice organisation, would like to take this opportunity to remind you of the globally recognised dangers and risks involved in establishing a waste to energy incineration industry in Australia. This information is critical to the consideration of future waste management options in Australia, in particular because of the negative multisector impacts that waste to energy incineration represents.

1. **Australia's obligations to the Stockholm Convention.**
   Waste to energy incineration emits a range of toxic and hazardous air pollutants[1] that include mercury, nanoparticles and Persistent Organic Pollutants (POPs) such as dioxins and furans (PCDD/DF), hexachlorobenzene (HCB), Polychlorinated Biphenyls (PCBs) and brominated persistent organic pollutants which are subject to the Stockholm Convention on POPs. Australia is a signatory to this convention and are therefore obliged to reduce and where possible, eliminate all forms POPs[2]. These POPs are persistent and toxic in the environment, bio-accumulate in the food chain and can travel vast distances across borders ultimately accumulating in the polar ice caps posing disproportionate adverse impacts on indigenous communities in these regions.[3] Approving incinerators will unnecessarily increase Australia's output of dioxins and other POPs thereby undermining the objectives of the convention and Australia's commitment to international law.

2. **Threats to children and host communities**
   It is the most vulnerable in the community, such as children, that are most at risk from the toxic air pollutants emitted by waste incinerators and the stockpiles of toxic ash they generate. These pollutants impact health at low levels of exposure. Host communities carry the disproportionate burdens of this industrial pollution through contaminated land and air

[1] British Society for Ecological Medicine (2008) *The Health Effects of Waste Incinerators*. 4th Report of the British Society for Ecological Medicine.
[2] Stockholm Convention on Persistent Organic Pollutants 2001, www.pops.int
[3] Elizabeth Burleson & Stephanie Dodson Dougherty, Arctic Justice: Addressing Persistent Organic Pollutants, 30 Law & Ineq. 57 (2012).

leaving residues in their environment that can contaminate the food chain, water and other life support systems they depend upon[4].

3. **Waste to Energy Incineration is a Climate Threat**
   Burning waste for energy contributes more greenhouse gases (GHGs)[5] and toxic air pollutants[6] per unit of energy than coal, oil or gas. Waste incinerators rely on the high calorific value of plastic – a fossil fuel-based material that contains numerous toxic substances that contribute to air pollution. Waste to energy incinerators do not provide clean renewable energy and therefore should not be entitled to renewable energy subsidies, grants or funds. These funds should be directed to real renewable energy projects.

4. **Waste to Energy incineration costs jobs**
   Independent research[7] has reported that zero waste management systems that use recycling, re-use, composting and anaerobic digestion generate many more jobs than incinerators. In general terms, waste incinerators are expensive, computer controlled, and mostly automated technology that only requires a small workforce to operate. Zero Waste Solutions based around recycling, re-use and composting, have higher employment opportunities and flow-on effects throughout the community and economy.

5. **False plastic recycling solutions.**
   Plastic waste pollution – on land and in the marine environment - represents a profound planetary crisis that countries all over the world are grappling with right now[8]. While it is a very seductive idea to use plastic waste for energy, fuel or chemicals, these options will only further pollute our environment and human health while plastic production continues and is in fact set to increase. The only sustainable solution is a transformation of our plastics material production industry. Extended Producer Responsibility laws are required for industry to take back, reuse and recycle their plastic waste. This will require industry to also remove toxic substances from their manufacturing processes, a problem that is currently holding back recycling and the promise of a sustainable circular plastics economy.[9]

6. **Australia is at a cross roads.**
   Decisions made today about waste management will have long term financial, ecological and human rights impacts. Burning our waste for energy entrenches an unsustainable linear economic model of raw materials extraction, production, consumption and disposal, wasting the finite resources contained in our waste streams that belong to future generations. While the EU moves to end subsidies for waste incineration and legislate for Zero Waste Solutions with strong policies to discourage the establishment of new incinerators and decommission

[4] Petrlick. J, and Bell. L. (2017) Toxic Ash Poisons our Food Chain. IPEN in cooperation with Arnika Association (Czech Republic) and National Toxics Network (Australia).
[5] U.S. EPA eGRID 2012 Database. Analysis by Energy Justice Network.www.EnergyJustice.net
[6] USEPA (2005) The Inventory of Sources and Environmental Releases of Dioxin-Like compounds in the United States: The Year 2000 Update. March 2005 External Review Draft.
[7] More Jobs, Less Pollution: Growing the Recycling Economy in the U.S. Prepared by: Tellus Institute with Sound Resource Management 2011; More jobs, less waste. Potential for job creation through higher rates of recycling in the UK and EU. Friends of the Earth UK, September 2010
[8] UNEP (2016). Marine plastic debris and microplastics – Global lessons and research to inspire action and guide policy change. United Nations Environment Programme, Nairobi.
[9] National Toxics Network Australia, (2016) Contaminants in Marine Plastic Pollution: "the new toxic time bomb". Dr Mariann Lloyd-Smith, Jo Immig.

old incinerators[10], Australia has a unique opportunity to learn from the mistakes of other comparable western countries without repeating them.

For these reasons above, we urge all state environment ministers and the federal government to resist this push by the fossil fuel industry and certain waste management sectors to establish a waste to energy incineration industry as the solution to Australia's waste and plastic marine debris problem. Instead we recommend investment in safe, proven, and sustainable zero waste strategies that support the reuse, recycling and composting industry and will uphold our international obligations to prevent the generation of POP's and an increase in our emissions of greenhouse gases and toxic air pollutants.

Your sincerely,

Jane Bremmer
Zero Waste Coordinator
National Toxics Network
Australia

[10]European Commission, The role of waste-to-energy in the circular economy, COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS, Brussels, 26.1.2017 COM(2017).