# **5. Food and Waste (CAD report from Citizens Forum on Climate)**

Jo Blackie, Strategic Waste Manager represented DCC at the Citizens Forum. There was no representative for Food.

Council response in red type

CAD response in blue type

## **5.1. Summary**

DCC scored above average in the Waste and Food category on the 2023 Climate Emergency UK Scorecards for similar councils, so it was good to see the ambition continuing in CERP3. The broad scope of action either in progress or planned is impressive as is the attention given to measuring outcomes for both emissions accounting purposes and social value. CAD noted the smart goal of developing a ‘waste specific carbon footprint reporting framework’ and the focus on ‘collecting additional scope 3 emissions from procurement contracts’ necessitating partnership working with the public sector.

Some councils are doing better than others on reducing the quantity of residual waste from all sectors therefore reducing the need for landfill and incineration [1]. Practical decisions based on circular economy principles are the most progressive way to reduce emissions long term. Durham County Council’s introduction of kerbside, food waste collection in 2025 should be an opportunity for a big public campaign on the need to increase all aspects of the circular economy. There is ‘no such place as away’! Many people do not think beyond throwing their waste into a bin and this needs to change.

Looking at the DCC website it is clear that much groundwork has already been laid. From the ‘5 Sustainable Buying Standards’ to the ‘Love food, hate waste’ advice, the ongoing challenge is to get retailers, service providers and the public better educated and motivated particularly understanding the social value or co benefits to be gained. OASES successful bid for National Lottery Community Fund money, £180k over 3 years, and the appointment of Jill Essam as coordinator to develop sustainable food projects across the county, including work with schools, should really help progress this work. The idea of a roadshow as part of a community engagement package is an excellent idea for reaching the far corners of the county, hopefully in a creative way.

Thank you for your hard work in this complex and urgent aspect of DCC responsibilities. CAD is keen to discuss ways we can support you and include more public representation in decision making and on the ground.

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## **5.2. CAD’s Challenges to DCC**

**Challenge 15:** CAD [Climate Action Durham] challenges DCC [Durham County Council] to reach a consensus decision on the best long-term, evidence-based strategy for coping with residual waste.

There is a well understood need to focus on **resource** management as well as residual **waste** management and to better engage the public. Various ways of addressing this are in CERP3 [Climate Emergency Response Plan 3].

CAD would like to see easy to find, easy to understand information, maybe good infographics, showing the council’s recycling targets, a breakdown of how all residual waste is treated a) what is locally recycled b) sent to landfill c) locally incinerated d) incinerated outside the county and evidence of progress towards reducing incineration. This sort of information, if well presented, could be part of a bigger campaign to motivate people to play their part. CAD notes an excellent DCC presentation on resource and waste management, dated July 2024 which could, perhaps be shared more widely. However, the amount of waste sent for incineration is not itemised in the Performance Update table [2].

There is currently no government target placed on Local Authorities around waste sent to incineration, which is why it is not included in the performance update but if CAD members would like to see this data we can of course provide it.

By way of some background for CAD members, Government strategy and therefore targets are all based around recycling and landfill avoidance. This direction to Local Authorities, to avoid landfill eg with the introduction of landfill tax and historically placing landfill diversion targets, is what has driven Local Authorities to seek alternative ways to handle waste. In our County Durham Municipal Waste Management Strategy we do not specify the type of residual waste treatment and have purposefully left our options open to whatever industrial solutions come forth.

**The Environmental Targets (Residual Waste) (England) Regulations 2023 impose a target on England to halve residual waste per capita going to either incineration or landfill by 2042 based on a 2019 base year.**

**As such, the focus in implementing Government policy is not just on recycling and landfill diversion but also on residual waste reduction, which includes reducing the quantity of waste that goes to incineration. For these national targets to be met they will need to be translated into local targets.**

**Lucy Powell, the Leader of the House of Commons, has stated on behalf of the UK Government that: *"The Government are committed to developing a circular economy in which we do not need waste incinerators…"* Source: Hansard - Commons Chamber - Business of the House. UK Parliament, 12 December 2024. Available from:** [**https://hansard.parliament.uk/Commons/2024-12-12/debates/913BBF7D-B7CC-4C6F-9868-FC534AF1BDC0/details**](https://hansard.parliament.uk/Commons/2024-12-12/debates/913BBF7D-B7CC-4C6F-9868-FC534AF1BDC0/details)

**Reducing incineration is also tied to increasing recycling. As set out in the UK’s 2018 Resources and Waste Strategy: “Residual waste is the mixed material that is typically incinerated for energy recovery or landfilled. Much of the products and materials contained in this waste could have been prevented, reused or recycled. This is inefficient not only because materials that hold value are being lost, but also incineration and landfill are the most expensive ways to treat waste”.**

Where we send it to is driven by the private sector development of technological solutions. We hope that the government’s drive around the circular economy and push to introduce new legislation eg. EPR and ETS will drive private industry to start investing in research and development of new technological solutions and we will fully engage with any of this work. We fully support the need for further research in this area and for new solutions to residual waste treatment to be found.

**Waste infrastructure can last 30-50 years and so plans have to take account of both existing residual waste treatment capacity currently operational and under construction as well as future falls in waste capacity. As an example, the Vale of Glamorgan council, which has a 70% recycling rate, has reached a stage where it does not routinely have sufficient feedstock to fulfil its supply quota for their jointly commissioned incinerator.**

**Defra’s December 2024 Residual waste infrastructure capacity note states: “Based on current population growth estimates, the total volume of residual waste (excluding major mineral wastes) in England in 2042 will need to be at most approximately 17.6Mt to meet the legally binding residual waste target. This is for both municipal and non-municipal residual wastes, and acts as a long-term signal for our residual waste treatment capacity needs that should be taken into account when planning or considering residual waste treatment infrastructure”. Source: Defra’s Residual waste infrastructure capacity note (Defra, December 2024). Available at:** [**https://www.gov.uk/government/publications/residual-waste-infrastructure-capacity-note**](https://www.gov.uk/government/publications/residual-waste-infrastructure-capacity-note)

**Defra also explains how there is currently 18.2 tonnes of English incineration capacity operational or under construction (split 14.3Mt operational and 3.9Mt under construction), and acknowledges that some existing plants might be able to accept more waste in the future, e.g. should plastic be removed from the waste stream, because it takes more than a tonne of waste to compensate for the calorific value lost from the diversion of plastic away from incineration.**

**As such, care needs to be taken when allowing any new residual waste treatment capacity to ensure that new capacity does not impede the achievement of the statutory residual waste reduction target.**

The DCC website states ‘non recycled waste can be used to generate energy which is an environmentally sound and economically sensible way of reducing landfill and substituting waste for fossil fuels.’ It is clear from the post it note feedback that many at the forum did not agree with this rather carefully worded statement.

There is increasing opposition to the commissioned Tees Valley Energy Recovery Incinerator (TVERF) with yet to be funded carbon capture and storage. The evidence is clear that there is over capacity of incinerators in England and that viable alternatives can and are being phased in by some councils[3]. The northeast’s low recycling rate correlates with a high incineration rate. This is a challenge which CAD hopes will be addressed by one of CERP3’s smart goals to ‘Develop a waste specific carbon footprint reporting framework and use this to inform decisions on waste management.’ This suggests strategy flexibility and that more evidence is needed to inform future decisions, especially regarding scope 3 incinerator emissions (also a recommendation in the 2023 Citizens Forum on Climate report) and their impact on the council’s net zero targets. The potential cost impact of the Emissions Trading Scheme and the best practice alternatives to long, plastic guzzling incinerator contracts will hopefully be considered in this goal[4].

The evidence base is not there for viable alternative ways to treat the volume of residual waste produced in County Durham and the Council disagrees with the statement made.

**It is not clear which aspects of the statement are being called into question by DCC. For example, does DCC deny that incineration results in CO2 being released at a rate of around 1 tonne of CO2 for each tonne of mixed waste that is incinerated?**

**Also, DCC has failed to respond to the criticism of the Council for their website claiming that sending waste to incineration is “environmentally sound and economically sensible".**

**As noted above, the Government’s Resources and Waste Strategy criticises the current practices with respect to incineration as inefficient and expensive. With the inclusion of incineration in the UK ETS, it is going to become ever more expensive to send waste containing plastics to incineration.**

**If the Council acknowledge that residual waste is undesirable and are merely stating that they need access to a small quantity of residual waste treatment capacity for the small proportion of genuinely residual waste, then even if this were the case it would not justify funding new incineration capacity nor entering into contracts that provide a financial incentive to send significant quantities of waste for incineration.**

**On 30 December 2024 Defra stated on behalf of the UK Government that: “Those developing energy recovery facilities (at all stages in the process) are encouraged to consider forecast changes to future capacity, demand, and the Government’s circular economy opportunities in light of the evidence published today”. Source: Government to crack down on waste incinerators with stricter standards for new builds (Defra, December 2024). Available at:** [**https://www.gov.uk/government/news/government-to-crack-down-on-waste-incinerators-with-stricter-standards-for-new-builds**](https://www.gov.uk/government/news/government-to-crack-down-on-waste-incinerators-with-stricter-standards-for-new-builds)

**This Capacity Note identifies the North East as an English region already suffering from incineration overcapacity. Source: Residual waste infrastructure capacity note (Defra, December 2024). Available at:** [**https://www.gov.uk/government/publications/residual-waste-infrastructure-capacity-note**](https://www.gov.uk/government/publications/residual-waste-infrastructure-capacity-note)

**Table 4: Operational, under construction and consented energy recovery capacity (Mt) in England broken down by region provides the following authoritative data for the North East Region:**

**1.12 Mt of operational capacity**

**0.28 Mt in construction capacity**

**1.84 Mt of consented, but not yet under construction, capacity**

**0.85 Mt of Local authority residual waste arising (2022 to 2023)**

**1.49 Mt of Residual municipal solid waste arising [not all of which is combustible]**

**These figures suggest that the North East region is already facing residual waste treatment overcapacity of around 100,000 tonnes, even if none of the 1.84 Mt of consented but as yet not under construction capacity goes ahead (i.e. without the proposed TV ERF being progressed), even if only 10% of the 1.49 Mt of Residual municipal solid waste arising is not combustible.**

**Additionally the UK Government is committed to supporting both their Jet Zero Strategy associated with Sustainable Aviation Fuel (SAF), and the Renewable Transport Fuel Obligation (RTFO). This will make use of some of the very same feedstock that is used by waste incinerators.**

**Pressing pause on with the TV ERF project would remove the very flexibility to accommodate and make use of emerging technologies providing alternatives to conventional incineration and landfill as residual waste treatment options.**

**In this regard, we note how the Waste-derived Sustainable Aviation Fuel (SAF) production facilities referred to in Defra’s Capacity Note could process between 5 million and 7 million tonnes of waste feedstock. Source: Non-incineration demands for residual waste in England (UKWIN, January 2025). Available at:** [**https://ukwin.org.uk/files/pdf/UKWIN-Non-incineration-demands-for-residual-waste-in-England-January-2025.pdf**](https://ukwin.org.uk/files/pdf/UKWIN-Non-incineration-demands-for-residual-waste-in-England-January-2025.pdf)

**Furthermore, we note that Alfanar’s Lighthouse Green Fuels project, located in Teesside, is expected to produce 124.2kt/y or circa 155.25 million litres of SAF per annum, and that this level of SAF production alone is associated with a feedstock demand of around 1 million tonnes per annum.**

**And on top of this anticipated SAF production capacity, a further 2 million to 3 million tonnes of waste feedstock can be expected to be used for cement kilns and Renewable Transport Fuels.**

We need to have a safe, reliable, sustainable and affordable solution for residual waste treatment that avoids landfill.

**The reason the UK Government adopted the residual waste reduction target and are promoting a move away from both incineration and landfill is precisely because incineration is recognised as not being sustainable.**

**The December 2024 press release that accompanied the Defra Capacity Note quoted Circular Economy Minister Mary Creagh declaring that: *“For far too long, the nation has seen its recycling rates stagnate and relied on burning household waste, rather than supporting communities to keep resources in use for longer”. Source: Press release: Government to crack down on waste incinerators with stricter standards for new builds. UK Government, 30 December 2024. Available from:*** [***https://www.gov.uk/government/news/government-to-crack-down-on-waste-incinerators-with-stricter-standards-for-new-builds***](https://www.gov.uk/government/news/government-to-crack-down-on-waste-incinerators-with-stricter-standards-for-new-builds)

We have looked at WIN’s information on the link provided and nowhere does it state alternative viable solutions to residual waste treatment.

**UKWIN provides some alternatives to incineration at:** [**https://ukwin.org.uk/act-locally/#alternatives**](https://ukwin.org.uk/act-locally/#alternatives) **and there are a series of cae studies provided by Zero Waste Europe that can be found at:** [**https://zerowasteeurope.eu/publications\_types/case-studies/**](https://zerowasteeurope.eu/publications_types/case-studies/)

If any CAD members are aware of waste technology currently available then we would very much appreciate the sharing of that information.

Waste minimisation and decreasing residual waste through repair, re-use, recycling composting and the introduction of food waste are our priorities.

**And DCC is urged not to take any actions that undermine these priorities.**

This will mean that waste that is currently contained within the residual waste stream is treated/re-processed in better more sustainable ways.

For example we welcome Defra’s strategy around recycling of plastic film and flexibles in 2027 - as a Local Authority we can provide the means to collect this for recycling but we need the waste industry within the UK to develop the technological solution to actually re-processing

**As warned by the Scottish Incineration Review, commissioned by the Scottish Government, which looked at evidence from both England and Scotland, the risk of incinerator lock-in is real and can undermine future recycling efforts. Source: Stop, Sort, Burn, Bury? - Independent Review of the Role of Incineration in the Waste Hierarchy in Scotland. Scottish Government, 10 May 2022. Available from:** [**https://www.gov.scot/publications/stop-sort-burn-bury-independent-review-role-incineration-waste-hierarchy-scotland/documents/**](https://www.gov.scot/publications/stop-sort-burn-bury-independent-review-role-incineration-waste-hierarchy-scotland/documents/)

**DCC has not demonstrated that there is any significant quantity of waste that could not be reduced, reused or recycled, nor that the Council could not access existing or emerging residual waste treatment capacity to deal with this quantity of waste in light of what is set out in Defra’s Capacity Note.**

**As such, the business case for the proposed TV ERF incinerator is out of date and needs to be reconsidered with respect to the Capacity Note, the move towards a more circular economy, and the inclusion of incineration in the UKETS.**

**Challenge 16:** CAD challenges DCC to increase the range and accessibility of circular economy initiatives across the county.

A mind set shift is needed to move from our current linear model. From long life products and reduced packaging to individuals rethinking, reducing, re-using, repairing and recycling, it is clear from the forum post it note feedback that a section of the public wants more options to enable them to play their part. DCC has many projects up and running with the public and private sector that need to be ramped up and publicised. Refill outlets e.g. Weigh to Shop and the online order and delivery service Bottle Swop help people to minimise plastic and explore more sustainable and durable products. Support for more businesses like these could improve understanding of circular economy principles. Bottle deposit return schemes can also work very well, as demonstrated in Ireland[5].

[1] For good practice, DCC should study examples in Wales. E.g. Cardiff scores highly regarding residual waste; see<https://councilclimatescorecards.uk/question/s7_wr_f_q9/?type=single>.

[2] See the presentation at:<https://acrobat.adobe.com/id/urn:aaid:sc:EU:457e9fe4-dc07-42ee-a762-d403424683c8>

[3] See the BBC 5-year study ‘Burning rubbish now UK’s dirtiest form of power’, available online at<https://www.bbc.co.uk/news/articles/cp3wxgje5pwo>. See United Kingdom Without Incineration Network (UKWIN) for policy suggestions at<https://ukwin.org.uk/facts/>.

[4] See<https://www.bbc.co.uk/news/articles/cje0lep9wx0o.amp>

[5] On the bottle recycling scheme in Ireland, see<https://www.theguardian.com/environment/2024/oct/22/ireland-first-bottle-deposit-return-scheme-reverse-vending-machines>.

[6] Vale of Glamorgan Council Recycling and Waste Management Strategy 2022 https://participate.valeofglamorgan.gov.uk/18397/widgets/52211/documents/30195