



Day of Action Against Incineration Talking Points

Background

References: [Presentation](#)

The **Day of Action Against Incinerators** is a united effort organized by international coalitions and affected communities to end waste incineration which uses the process of combustion to convert waste into carbon dioxide and water. In the height of the climate, economic and environmental crises, waste incineration in its different forms such as Waste-to-Energy (WTE) incinerators, gasification, pyrolysis, waste co-incineration or co-firing (i.e. burning Refuse Derived Fuels in cement kilns, coal-fired power plants, and other industrial boilers), these expensive and dirty technological fixes are promoted as waste and climate solutions. The day of action is an initiative aimed at raising awareness and mobilizing communities to combat the detrimental impact of waste incineration and call for the transformation of our waste and energy systems in favor of sustainable and community-based solutions.

Over the last decade, massive institutional support and investments have been made by governments and international institutions in Waste-to-Energy (WTE) incinerators despite undeniable evidence and environmental agreements to address the climate, environmental and health impacts. International Financial Institutions (IFIs) have played a role in using public finance to support the WTE industry, shape policies and development knowledge in favor of WTE incineration.

IFIs also plays strategic leadership in transforming national and global policy and investment directions on waste and energy sectors often undermining sustainable and community-based solutions.

The **Day of Action Against Incinerators** is mounted during the opening of the Asian Development Bank (ADB)-led event, the [Asia Clean Energy Forum \(ACEF\)](#) – the largest meeting of governments, private sector, financial institution, and other stakeholders in the region promoting false solutions to climate action, including WTE incinerators. This year, ACEF is organized on June 13 – 16 with the theme “*Navigating Toward a Carbon-Neutral Future Through*



Clean Energy Solutions”, which will be dangerously promoting WTE incinerators as part of a just energy transition.

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Hashtags and Slogans

Primary hashtags: #FalseSolutionsExposed #Burnt #DayOfActionAgainstIncineration

Secondary hashtags: #NoTrashTalkADB #NoTimeToWaste #ACEF2023

Topline Messages:

- **Stop investing and institutionalizing Waste-to-Energy (WTE) incineration as a waste and climate solution.** Claimed as a “low-carbon, clean, or transition source of energy”, WTE incineration has been supported by citizen’s taxes in supporting the WTE industry to operate in poor countries when rich countries have banished this technology in their own borders. The European Union (EU) has already excluded WtE incineration from their list of activities worthy of sustainable financing, despite having better environmental regulations than developing countries, as it harms efforts toward achieving a circular economy.¹ WTE

¹ The EU Taxonomy Regulation defines activities leading to increase in waste incineration as harmful to the circular economy. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32020R0852>
On this basis [the Climate Change Mitigation Taxonomy](#) proposal excludes waste to energy incineration from the list of activities considered as sustainable.



incinerator has also been excluded from other EU funds such as the Regional Development and Cohesion Fund and the Just Transition Fund.² In the contrary, governments and IFIs have been providing legal and policy support for WTE incineration even to the extent of violating existing legislations banning incinerations. In addition, investments in WTE incineration divert important resources for expansion of real renewable energy, such as wind and solar energy and for Zero Waste solutions, such as waste prevention, at source segregation, reuse, composting, and recycling which are already existing in poor countries.

- **Waste-to-Energy (WTE) incinerator is neither just, nor a transitional source of energy. It is reliant on fossil-fuel based plastic waste and thus only extends the use of fossil fuels.** High levels of carbon intensity were documented in EU's WtE incineration which was about two-times greater than the current EU average electricity grid carbon intensity³. Similarly, the US Environmental Protection Agency also states that incinerators emit more carbon dioxide per megawatt-hour than coal-fired, natural-gas-fired or oil-fired power plants.⁴ A recent scientific paper further proves that incinerators emit more greenhouse gas emissions per unit of electricity produced than any other power source.⁵ It also creates both feedstock lock-in and carbon lock-in for 20-25 years – a time that we don't have. Therefore, support on waste incineration is not a phase out from the dirty energy sources.
- **Waste-to-Energy (WTE) incineration aggravates health and economic inequities in poor communities and marginalized sectors .** WTE incineration projects trigger economic and physical displacement on wasteworkers and wastepickers. It also creates the least job compared to other waste management options, such as reuse, separated waste collection, composting and recycling. It also emits highly toxic and harmful pollutants into the atmosphere, including greenhouse gases, heavy metals, and Persistent Organic Pollutants (POPs) such as dioxins exposing waste workers, communities and the ecosystem to lifelong harm. Multilateral agreements such as Minamata Convention and Stockholm Convention have clearly mandated phase out of waste incinerators globally because they are a major source of POPs and mercury.
- **Stop privatizing the waste sector and focus on strengthening waste management as an essential public service. Waste management is linked to the right to a clean and healthy environment.** Hence, governments and IFIs must ensure that investment in waste sectors must put people before profits. As an essential public service, it must be operated by governments. Private sector capture of the waste sector has been known for various

² <https://data.consilium.europa.eu/doc/document/ST-13719-2020-INIT/en/pdf>

³ Zero Waste Europe. [The impact of Waste-to-Energy incineration on climate](#)

⁴ [STOP TRASHING THE CLIMATE](#)

⁵ [Waste Incinerators Undermine Clean Energy Goals](#)



issues, particularly access of the poor to basic services, displacement of wasteworkers and wastepickers, lack of transparency and accountability.

In the case of WTE incinerator plants run by private sectors, disclosure of information, pollution monitoring and control, and also remediation of polluted areas have been major issues. Given waste management is part of essential public service, it must be publicly-owned— particularly in the context of economic and energy crisis, Waste incineration is undoubtedly the most expensive and the most inefficient way to generate energy and manage waste and often requires huge capital outlays to operate. In the context of post-covid recovery, energy crisis, indebtedness, and various global economic challenges, investments on WTE incineration leads to debt traps, particularly when it is delivered through loan

However, climate financing today has placed WTE incineration as a waste and energy solution which provides hefty subsidies (i.e. renewable energy subsidy, tipping fee subsidy, etc) while it continues to pollute and externalize actual risks and hazards of incineration. One example is the labor component where in private sector, labor rights and their livelihood tend to be deprioritized.

Messaging by Topic

Topic 1: Resource Efficiency

- **WTE incinerator is a waste of energy at global level**
When waste (read: resources) is burnt, new resources must be mined, regrown, and extracted all over again. This process consumes a lot of energy and release a huge emission along the supply chain. On top of that, WTE incinerator requires auxiliary fuel to burn waste, which typically uses fossil gas, coal, or diesel. Also, waste is a very carbon-intensive material, particularly when fossil material such as plastic is included. [A recent study](#) found that typical WTE incinerator efficiencies in generating energy, especially when generating electricity only, are around the mid-20's% in the best cases. This compares poorly with the figures of around 35% for coal-fired electricity generation, and 55% for combined cycle gas turbine (CCGT) plants.
- **Waste incineration is the fastest way to deplete our limited and valuable resources**
When waste (read: resources) is burnt, new resources must be mined, regrown, and extracted all over again. This is the fastest way to deplete or very limited resources in a highly pollutive way.
- **WTE incinerator is not part of a Circular Economy.**



- The EU Taxonomy Regulation (EU 2020/8526) has put forward a comprehensive list of activities within the waste sector that fulfill this criteria, notably excluding Waste-to-Energy incineration as it may harm one of the key environmental objectives, to ensure the transition to a circular economy, waste prevention and recycling.
- In 2017, the Communication on Waste-to-Energy analysed the current role of Waste-to-Energy incineration and gave guidance to Member States on how to cope with the problems generated. For high capacity countries it recommended: 1) Make incineration more expensive with taxes (i.e. gate fees); 2) Phase out public support schemes for Waste-to-Energy incineration and use funds more efficiently to support upper tiers in the waste hierarchy; and 3) Put a moratorium on any new facilities and decommission old ones. For countries with low capacity, the recommendation was to improve separate collection obligation and recycling.
- The European Investment Bank (EIB), the biggest multilateral financial institution and one of the largest providers of climate finance in the world, published its Circular Economy Guide in January 2019 which excludes incineration as a contributor to a circular economy.
- **WTE incinerator hinders waste prevention and recycling targets**
 - In [6 of the 9 UK](#) regions, councils are burning more than they recycle. This clearly shows that incineration in the UK has hindered efforts to increase recycling rate. Moreover, [a research shows](#) that there will be 14.7 million tonnes of English incineration overcapacity from a total capacity of 28 million tonnes in 2042. As Durham University's Professor Gregson observed, [the areas with the highest levels of incineration have the lowest recycling rates](#). The only way recycling can be increased – e.g. in places like London, the West Midlands, and the North East – is to send less for incineration.
 - In China, [several provinces have invested too much in incineration](#), overlooking improvements in waste sorting and recycling. In the short term, the results show that several provinces, including Anhui, Tianjin and Zhejiang risk overinvestment in new incineration capacity because planned capacity for dealing with mixed waste exceeds the projected quantities.
 - In Seoul (South Korea), [the four Seoul incinerator facilities had been operating under its designed capacity](#). These four plants were designed to handle waste volumes at the time (in 1991) and for the future, and could handle 2,850 tons a day. There was a huge gap between designed capacity and actual volume (volume that is incinerated and goes to landfill) in 2012. For example, the 400-ton Yangcheon facility was using only 53% of its capacity for waste from Yangcheon-gu in 2002. By 2012, volumes had dropped even further to 25%. Mapo Resource Recovery Facility, designed to handle 750 tons of municipal waste from Mapo-gu, Jung-gu, and Yongsan-gu, was using only 60% of the designed capacity, mainly due to the dramatic changes in South Korea's waste management system (i.e. the volume-based waste disposal fee system in 1995,



- Expanded Producer Responsibility in 2003, and banning of direct burial of food waste in 2005).
- The Netherlands there is a current incineration overcapacity of around 10%,⁶ caused by a declining availability of waste and overinvestment. That creates an important reliance of Dutch incineration facilities from waste imports, mostly from the UK. This demand is likely to increase, according to the Dutch Waste Management Association (Van Eijik 2012)
 - Countries like Sweden or Denmark also have incineration overcapacity, as well as plans to expand it. [Dan Jørgensen, Denmark's climate minister stated that](#) "Today, we import waste with a high content of plastic in order to [use the excess] capacity at the incineration plants, with increasing CO₂ emission as a result."
 - In Germany, the current incineration capacity is already bigger than the national generation of refuse waste, according to a report commissioned by the German Union for Nature Protection (NABU, 2009).
 - Incineration plants in [Madeira and Azores](#) need a constant input of waste in order to function, the regions have to burn most of their municipal solid waste, with Madeira presenting one of the lowest recycling rates in the country. Moreover, waste incineration has resulted in an extremely low recycling rate in Madeira, with official data recording only 10% recycling in 2017. The Autonomous Region of Azores has a municipal solid waste incinerator on Terceira, with a second incinerator planned for São Miguel. Both have recycling rates that are relatively low, with no significant increase in recent years.

Topic 2: Pollution Prevention

- **Waste incineration is neither a low-carbon nor a clean energy solution**
- WTE incinerator plants with the best standards and advance technology have failed fail to prevent toxic pollution and protect communities (referring to European and US incinerators):
 - In India, three functioning WTE plants in Delhi were found violating pollution regulations that included the release of excess dioxins and furans, hydrogen chloride and excess quantities of particulate matter at nearby air quality monitoring stations. The results of stack emission monitoring of [the Okhla WTE plant](#) shows that it released dioxins and furans 890% more than the permitted amounts. Similarly, levels of hydrogen chloride exceeded prescribed limits by 296%. Interestingly, the Online Continuous Emission Monitoring System (OCEMS) installed by the plant had recorded readings vastly different from what the CPCB's inspection found, showing figures closer to the stipulated norms. The plant also produces 250 metric tonnes of ash daily from the combustion process that are disposed of at a landfill in Jaitpur.



- In South Korea, the Korea Occupational Safety and Health Agency investigated [the health status of incineration plant workers in Seoul](#). 10 workers from 2 incinerators were tested and '2378-tetrachlorodibenzo dioxin' was measured at an average of 1.455 ppt in the blood of the workers.
- In Europe, dioxins contamination are found in [the Netherland, Lithuania, the Czech Republic, Spain, Switzerland, the United Kingdom](#).
- In the UK, [at least 103 WTE proposals](#) have been cancelled and refused due to various issues, mainly community's rejection.
- In the US, [Baltimore, Detroit, Long Beach, Minneapolis, and Newark](#), cities that currently incinerate their waste or have recently relied on waste incineration, highlighting how burning waste undermines successful recycling program (full [report](#) here).
 - Detroit incinerator, the largest municipal solid waste incinerator in Michigan has a long history of emissions violations was shutted down on March 27th, 2019, after decades of community activism by Breathe Free Detroit. [Detroit WTE plant was shutted down because it was too costly and has generated complaints of foul odors and emission violations for years](#)
 - The Essex County Resource Recovery incinerator (Newark) burns about 2.8 tons of waste per day. It emits more lead into the air than any other U.S. incinerator, in addition to dozens of other toxic chemicals that pollute the air, land, and water.
 - A few years ago, the South Baltimore Community Land Trust (SBCLT) managed to shut down a proposal for what would have been the largest incinerator in the country, sited to be built in the community already subjected to the worst toxic air emissions in the whole country.
 - Hennepin Energy Resource Center (HERC) incinerator is located in in Downtown Minneapolis – near where the majority of Minneapolis' Black population lives, a part of the city that has the highest asthma rate in the state. HERC burns 1,000 tons of trash per day and produces 1.5 million pounds of emissions every year, including heavy metals, carbon monoxide, nitrogen oxide, sulfur dioxide, and dioxin.
 - East Yard Communities for Environmental Justice (EYCEJ) succeeded in shutting down the incinerator in Commerce, which had plagued communities for 31 years. This win was built off the back of groups organizing together to defeat legislation that would have provided incinerators with much-needed subsidies in the form of renewable energy credits, despite incineration being a significant source of greenhouse gas emissions. [The Commerce WTE plant \(Los Angeles\) was decommissioned due to inefficient operating costs and toxic emissions.](#)
- We don't want toxic ash and toxic air from WTE incinerator
- Who has to pay for remedy from toxic incinerators?
- Waste incineration does not solve our waste problem as it only changes the nature of waste issues from sanitation/cleanliness to toxic and hazardous.
- Burning waste only shifts one form of pollution into another form.



Topic 3: Climate change

- WTE incinerator dirtier than coal and fossil gas power plants
- Burning waste is burning fossil fuels
- WTE incinerator is highly reliant on burning plastic which is 99% fossil
- Waste is not a renewable energy source
- WTE incinerator must not be part of just energy transition
- Support on waste incineration conflicts with our global agenda to keep the average temperature rise below 1.5°C

Topic 4: Just Transition

- WTE incinerator has no place in a just transition both on waste and energy sectors
- WTE incinerator projects displace wasteworkers and wastepickers economically and physically

Topic 5: Privatization

- Stop privatizing the waste sector and focus on strengthening waste management as an essential public service.

Audience-Focused Messaging

Audience #1 National and Local Government: *For national and local governments to reject false solutions such as WtE incinerators*

Shared Values	Problem	Solution	Call to Action
Environmental protection Waste management solutions Ensuring public health Providing basic infrastructure and essential services Putting public interest at front	Waste Waste management	Show that waste incineration is not a solution. Show that Zero Waste works.	Burning waste will not solve the waste crisis. Invest in real solutions.



Audience #2 **Media**: *For the media to have a critical look at the waste management solutions being proposed and pushed by governments, industry, and IFIs.*

Shared Values	Problem	Solution	Call to Action
Balanced reporting Advocacy journalism	Waste issue	Reporting the waste problem and solutions to the problem	Change the narrative against false solutions.

Audience #3 **International Financing Institutions (IFIs)**: *For IFIs to acknowledge our demands*

Shared Values	Problem	Solution	Call to Action
Environmental protection	NGO and CSO protests	Work with the community	Burning waste is a climate disaster. Follow the precautionary principle. Divert investment from harmful technologies, go for ZW.

Audience #4 **Youth and the voting public**: *For the youth and the voting public to be aware of the dangers of WtE incinerators, to speak against it, and to join our campaign against false solutions.*

Shared Values	Problem	Solution	Call to Action
Environmental protection and solution to waste	WtE proposals	Inform the public of the risks involved	Burning waste disastrous for the



Public funds	Possibly unaware of the problems and risks associated with WtE		environment and climate
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Audience #5 **GAIA AP Members and allies**: *For our members and our allies to work closely with us and join us in bringing our demands to concerned agencies*

Shared Values	Problem	Solution	Call to Action
Environmental protection	WTE proposals	Fight the proposals Promote Zero Waste solutions	Burning waste is a climate disaster.

FAQ's

Responses to Anticipated Pushback

This is in the case of a campaign or publication that is more confrontational in nature and may elicit a response from an opponent. See crisis comms [liability section](#) and [media section](#) for details.

Resources

- [Anti Incineration Starter Kit](#)
- [Anti Incineration Narrative Toolkit \(GAIA Asia Pacific\)](#)

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