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SUBMISSION ON WASTE-TO-ENERGY ON ASIAN DEVELOPMENT BANK'S ENERGY POLICY WORKING PAPER

We, the Global Alliance for Incinerator Alternatives (GAIA) and our allied networks, are writing to state our unequivocal opposition to the continued support of the Asian Development Bank on waste incinerators with energy recovery or waste-to-energy (WTE). The proposed policy is inconsistent with the directives of the IPCC to limit or return global mean warming below 1.5°C in synergy with achieving a more sustainable and equitable society. It is not offering a transformational road for the region.

In the first round of stakeholders' submission¹, we have laid out an elaborate discussion and suggested policy languages based on IPCC's recommended framework for assessing feasibility of adaptation and mitigation options for accelerated transition aligned with 1.5°C pathways. The six feasibility dimensions as guiding criteria include mitigation indicators such as cost-effectiveness, employment and productivity enhancement potential, simplicity, absence of risk, political acceptability, legal and administrative feasibility, institutional capacity, transparency and accountability potential, social co-benefits, social and regional inclusiveness, intergenerational equity, human capabilities, reduction of air pollution, reduction of toxic waste, reduction of water use, improved biodiversity, and limited use of scarce geophysical resources.² This approach to choosing policy options for accelerated transition demonstrates the inseparability of climate-related, environmental, and social factors.

However, the revised draft is close to committing to "business-as-usual" energy solutions in the name of low-carbon transition. It is our belief that the ADB must take firm leadership in making sure that development investments contribute to a green, resilient, and just recovery. In a region where half of its waste is wet waste, thousands depend on recycling for jobs, have weak financial, technical and institutional capacity to govern the risks emanating from WTE, and are still struggling to curb a global pandemic – ADB should find the use of burn technologies inappropriate and unethical in the road to low-carbon transition.

Our critical points on the revised policy:

1. **Paragraph 71 states that ADB will continue its support to WTE investments and indicates that a prudent order of waste management is a prerequisite for ADB's investment in WTE.** However, it does not in any way address the central concern of the international community and affected

¹[GAIA Submission on the Asian Development Bank's Draft Energy Policy 2021 Submitted to ADB on 30 June 2021](#)

² [Global Warming of 1.5°C \(IPCC, 2018\)](#)



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communities on the very application of burn technologies – both as an option for waste management and power generation. In the context of planned continued support, the prerequisite for prudent waste management systems does not ensure that it will not hinder ambitious waste reduction, reuse, and recycling targets. UNEP has strongly warned countries about the risks of WTE in undermining waste prevention, reuse and recycling policies and programs – especially with “put or pay” contracts that mandate municipalities to provide a fixed amount of waste to the incinerator or pay a fine.³ Moreover, the proposal does not address the fact that waste incinerators are more carbon-intensive than coal power plants.⁴ In addition to the severe climate impact it poses, WTE is the most expensive way to generate energy and manage waste.⁵ It has complex and compound harm to the health of our societies and the environment.⁶

It is important to understand that different technologies are hosted by WTE terminology. The European Commission classifies processes such as anaerobic digestion as a recycling operation because it results in the production of biogas and of nutrient-rich digestate. On the other hand, waste incineration, waste co-incineration, and landfill gas capture technologies are regarded as disposal.⁷ Therefore, the international community has agreed to eliminate waste incineration as an “unacceptable” option in its order of priorities.⁸

More concerning is that ADB’s continued support for WTE is not adequately met with stronger environmental and social governance tools and mechanisms. IPCC is clear that deployment of technology and large installations depends upon economic conditions (costs, capacity to mobilize investments for R&D, monitoring and redesign), social or cultural conditions (acceptability), and institutional conditions (political support).⁹ Case studies can demonstrate system-level interactions and positive or negative feedback effects between the different conditions. These suggest that each set of conditions and their interactions bear equal importance other than the type of feedstock and deployment of best appropriate technologies.

³ [Waste to Energy: Considerations for Informed Decision-making \(UN Environment Programme, 2019\)](#)

⁴ [Waste Incinerators Undermine Clean Energy Goals \(Tangri, 2021\)](#)

⁵ [The High Cost of Waste Incineration \(GAIA, 2021\)](#)

⁶ [Fact Sheet: Pollution and Health Impacts of Waste-to-Energy Incineration \(GAIA, 2019\)](#)

⁷ [European Commission Communication Letter: The role of waste-to-energy in the circular economy \(2017\)](#)

⁸ [Zero Waste International Alliance's Zero Waste Hierarchy of Highest and Best Use 6.0](#)

⁹ Chapter 4 of the [IPCC Special Report](#) lays down the multidimensional aspects of assessing individual adaptation and mitigation options along 1.5°C-consistent pathways.

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Unit 330, Eagle Court Condominium | 26 Matalino Street, Barangay Central

Quezon City | Philippines 1100

Telefax: +632 436 4733



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The revised draft puts heavy reliance on the deployment of “the best internationally available technologies” in the design and operation of such projects, national laws, and corporations’ environmental and social policies in governing the risks from WTE which have been proven by independent ADB evaluations to be weak and insufficient in addressing social and environmental risks from ADB projects.

Further, it is alarming that while the draft in May 2021 has a directive to develop a guidance notes for WTE, the revised draft fully omitted this provision, making project implementers and the public blind on framework appraisals, methodologies for choosing “best appropriate technologies”, risk-mitigation measures, and the implementation arrangements on WTE.

2. Paragraph 77 states ADB’s continued support for biofuels and exploiting the broad categorization of “waste” as sources of renewable energy.

We oppose the exploitation of agricultural and forest resources for the primary use of energy production in a region where food and water insecurity, landlessness, and land use conflict, and environmental degradation are causing deep inequities in the region. The order of priority for agricultural and forest resources is to ensure sustainable sources of food and ecosystem services for poverty-reduction. After such purposes have been met, waste streams from these activities can then be utilized for providing affordable, localized, and sustainable energy in last mile communities where pockets of rural communities have proven a certain level of success. However, the revised draft’s consistent use of “waste” opens the floodgates for including harmful technologies using fossil-based waste streams to be supported and de-risked in the low-carbon transition. It is critical for ADB to strengthen and limit the use of waste streams as put forward by the IPCC’s guidance on sources of renewable energy. The same policy has been applied by the European Union in its Renewable Energy Directive.

In addition, highly centralized systems of biofuel production do not address energy access to last mile communities. The scale of operations of large-scale systems also magnifies the social and environmental risks for communities.

We strongly recommend that ADB revisit and strengthen these provisions and align it to IPCC directives. It is urgent that the low-carbon transition path should lay down policies to deploy and leverage public investments toward real actions for accelerated transition. We lay down these following recommendations:



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1. **On paragraph 71 and 77.** We propose to clearly limit the kind of feedstock to organic and clearly limit the particular conversion route of recovering energy from waste based on IPCC's recommendations that only the organic component of municipal solid waste is considered renewable. In addition, limit the technology for deployment to non-burn technologies, particularly, anaerobic digestion which is proven to have more GHG offset capacity and environmental and societal contributions. Our proposed wording:

"ADB shall support biological waste-to-energy investments provided that the only feedstock utilized is organic waste, using bio-chemical conversion technologies such as anaerobic digestion and fermentation. In addition, ADB's assistance should prioritize the development of comprehensive waste management roadmaps aimed at reducing waste generation, improving collection targets, incentivizing materials reuse and recycling, and overseeing safe management of hazardous waste, in accordance with Stockholm, Basel, Rotterdam and Minamata Conventions and national laws, whichever is stricter. A guidance notes on WTE will be developed and made publicly available."

2. **On paragraph 77.** We highly encourage ADB to invest in small-scale, decentralized local energy systems, even in the use of organic waste streams. Several cases have proven that such systems are successful in reaching last mile communities, manageable by community members provided technology transfer is facilitated, socially and environmentally-enhancing, and supported by appropriate investments to start-up.

To this date, there has been no specific dialogue on waste-to-energy with civil society and affected communities with ADB Management. We urge ADB to open consultations to allow thorough discussions on the different energy sectors.

We urge ADB to take decisive and appropriate actions in this period of multiple crises facing the region by ensuring that polluters will no longer be promoted and incentivized in the critical path to low-carbon transition. The lack of time and resources for keeping global temperatures at 1.5°C compels us to use development investments for stimulating economic growth, social equity, environmental sustainability and real climate action.

INTERNATIONAL ORGANIZATIONS

1. Break Free From Plastic (BFFP)
2. Global Alliance for Incinerator Alternatives
3. Green Army International
4. National Toxics Network Australia

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REGIONAL ORGANIZATIONS

5. 350.org Asia
6. Asian Peoples' Movement on Debt and Development
7. Center for Adaptive Capacity Building Research (CAB)
8. Greenpeace Southeast Asia
9. Health Care Without Harm SE Asia
10. Joint Action for Water
11. NGO Forum on ADB

NATIONAL ORGANIZATIONS

China

12. Taiwan Watch Insitute
13. Taiwan Zero Waste Alliance

Hong Kong

14. Greeners Action

India

15. All India Kabadi Mazdoor Mahasangh (AIKMM)
16. Aravalli Bachao
17. Athena Infonomics
18. Arya Samaj Foundation
19. Citizen consumer and civic Action Group
20. Darjeeling Himalaya Initiative
21. DLR Prerna
22. Ecotourism & Conservation Society of Sikkim
23. Ecity Solid Waste Management Task Force
24. Environmental Force at Grass Root Level
25. Green Army
26. Green Communities Foundation
27. Independent
28. Indiavision Realty & Infrastructure Pvt Ltd
29. Integrated Mountain Initiative
30. Jan Vikas Society
31. Khanchendzonga Conservation Committee
32. Let India Breathe
33. Let's Go Foundation Mirik
34. Mother Nature Foundation
35. Nagrik Chetna Manch
36. Omega Ecotech Products India Pvt.Ltd

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37. Paryavaranmitra
 38. Pelican Foundation
 39. Self
 40. Socialist Party Telangana
 41. Society for Direct Initiative for Social and Health Action (DISHA)
 42. Solid Waste Management Round Table
 43. Solid Waste Management Institute of Maharashtra
 44. Thanal
 45. UPasna Kapoor
 46. Warrior Moms
 47. WWF - India
 48. Youth Action for Rural Development
 49. Zero Waste Himalaya
- Indonesia**
50. Alliance for Zero Waste Indonesia (AZWI)
 51. Nexus Foundation for Environmental Health and Development (Nexus3 Foundation)
 52. Wahana Lingkungan Hidup Indonesia (WALHI) / Friends of the Earth Indonesia
- Malaysia**
53. Environmental Protection Society Malaysia
- Maldives**
54. Zero Waste Maldives
 55. Save Maldives Campaign
- Mongolia**
56. Oyu Tolgoi Watch
- Nepal**
57. AVS Krishna Chaitanya
 58. Health Environment and Climate Action Foundation (HECAF360)
- New Zealand**
59. Aotearoa Plastic Pollution Alliance (APPA)
- Pakistan**
60. Pakistan Fisherfolk Forum
- Philippines**
61. 350 Pilipinas
 62. Action for Nurturing Children & Environment, Inc.
 63. Alyansa Tigil Mina (ATM)
 64. BAN Toxics
 65. Buklod Tao
 66. Center for Renewable Energy and Sustainable Energy (CREST)
 67. Ecowaste Coalition

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- 68. Greenresearch Environmental Research Group, Inc.
- 69. Green Stage Filipinas-Maskara
- 70. Kinaiyahan Foundation INC.
- 71. Living Laudato Si' Philippines
- 72. Life Haven Center for Independent Living
- 73. Oceana Philippines International
- 74. Philippine Earth Justice Center, Inc.
- 75. Youth Advocates for Climate Action Philippines (YACAP)

South Korea

- 76. Korea Zero Waste Movement Network (KZWMN)

Vietnam

- 77. Vietnam Zero Waste Alliance (VZWA)

About the Global Alliance for Incinerator Alternatives

GAIA is a worldwide alliance of more than 800 grassroots groups, non-governmental organizations, and individuals in over 90 countries. With our work we aim to catalyze a global shift towards environmental justice by strengthening grassroots social movements that advance solutions to waste and pollution.

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