

OEWG 12 - IPEN intervention on D10 Incineration guidelines

Thank you Chair

I speak on behalf of IPEN. We appreciate the work done by the Small Intersessional Working Group on the update of the D10 Technical Guidelines addressing incineration but believe more information should be included in the guidance about the impacts of incineration on human health and the environment.

Currently the guidance provides minimal information about incinerators as a significant global source of dioxins and furans as well as other unintentionally formed persistent organic pollutants. While incinerators meeting BAT BEP requirements may minimize POPs emissions to air through filtration technology this is nearly always achieved at the expense of transferring POPs into the residual ash. For every 3 tonnes of waste burned around 1 tonne of UPOPs contaminated ash is generated. In this way millions of tonnes of POPs contaminated ash are generated every year and landfilled or used in construction which eventually results in the POPs content being released to the environment to build up in our food chains.

Incineration of waste also releases large volumes of CO₂ and other greenhouse gases which contribute to the current climate emergency and this issue should be better addressed in the guidance.

When a party seeks to improve their waste management system, they should be able to look to technical guidance for both negative and positive long-term outcomes of adopting certain technologies. The current guidance needs to provide more balance to help parties address the very real issues of POPs contamination, ash management and carbon emissions.

Pyrolysis and gasification, both technologies widely recognized as a forms of incineration, are clearly absent from the guidance. Both of these technologies are now heavily promoted by the petrochemical industry as a solution to plastic waste pollution, yet there is no guidance available to parties to assess the impacts of these technologies and they should be included in revisions of the D10 guidance. IPEN would like to see a more balanced approach to the guidance that covers all the issues associated with incinerating waste rather than just a guide to the construction and operation of incineration technology.

Finally, IPEN would urge all parties to ensure that the guidance they need to move toward a circular economy includes clear information about all the impacts of techniques and technologies including negative impacts so that they can make judgements that are in the best interests of the health of their populations and the environment.

Thank you Chair