To: To the Associate Minister for The Environment and Local Government New Zealand

We request that you:
1. call in and decline all applications to build waste-to-energy incinerators in Aotearoa New Zealand
2. declare the rejection of waste-to-energy incinerators a matter of national significance [1]
3. refer the matter to a board of inquiry for a decision on the cumulative detrimental effects of toxic emissions and particulates falling on land and incinerator bottom ash leachate flowing from hazardous landfills into our waterways [2]
4. support the transition to a circular economy by establishing a nationwide network of resource and material recovery parks [3]

Please post all forms to Zero Waste Network, PO Box 18164 Glen Innes, Auckland
WE'RE GOING CIRCULAR
Right now, we are seriously challenging our planet’s ability to sustain life. People everywhere are looking for ways to preserve valuable resources and prevent pollution while creating jobs and invigorating a zero waste circular economy. Incinerators undermine these goals because they’re part of an outdated linear system that forces us to continually extract new resources only to destroy them after we’ve used them for just a short while. Our future lies in replacing these destructive technologies with regenerative systems.

INCINERATORS POLLUTE OUR AIR
While it’s true that today’s incinerators are cleaner than older models, they’re still not perfect. Modern incinerators still release toxic chemicals that include dioxins [4], mercury [5] and cadmium [6] — substances that cause cancer, nerve damage and birth defects. Anyone who lives downwind from an incinerator is in danger of breathing in these dangerous chemicals and suffering the health consequences. [7] Toxins released into the air fall back onto the land to be absorbed by plants and eaten by livestock eventually finding their way into our bodies, via our food, causing further sickness and disease. [8] But the worst part about these toxins is that many don’t break down with some persisting in their toxic state in the environment for decades. [9]

INCINERATORS POLLUTE OUR LAND
Up to 25% of waste that’s burnt falls to the bottom of an incinerator to become incinerator bottom ash (IBA). This extremely toxic material is mostly dumped in special hazardous waste landfills, but in some countries it’s also used in road building and construction and sometimes spread on land as fertilizer. [10] Researchers are now raising serious concerns about the dangers of IBA with numerous studies [11] showing the detrimental effects of this highly toxic material. These problems are compounded by disposal of smokestack filters that capture highly toxic fly ash. These filters are disposed of in hazardous waste landfills along with IBA where they contribute to the toxic load in the landfills.

INCINERATORS POLLUTE OUR FRESHWATER AND MARINE ENVIRONMENTS
Incinerator toxins falling back to land are regularly washed into waterways where they combine with leachate from hazardous waste landfills. These contaminants poison fish and other aquatic life as they flow through our streams and rivers into our harbours and eventually into our oceans. These toxins have the potential to enter our food chain at every stage of their journey to the sea.

INCINERATORS RELEASE GREENHOUSE GASES
While toxins emitted from incinerator smokestacks cause immediate health concerns, most of the exhaust gas is carbon dioxide, which has long term effects on our climate. The Intergovernmental Panel on Climate Change reports that each tonne of waste burnt produces up to 1.2 tonnes of carbon dioxide [12] which can stay in our atmosphere contributing to global warming for decades. Throughout the world, we’re looking for ways to urgently reduce our climate change emissions. Waste-to-energy incinerators work in direct competition with this goal. Incinerators contravene our climate change commitments as signatories to the United Nations Framework Convention on Climate Change, the Kyoto Protocol, the Paris Climate Agreement, and Agenda 2030. And, they directly contradict support for our Pacific partners through endorsement and support for the Kainaki II Declaration (which declares a climate crisis in the Pacific region) and, our signed commitment to the Boe Declaration on Pacific security.

INCINERATORS ARE INEFFICIENT
While incineration companies are happy to point out that the waste they burn would otherwise be sent to landfill, they don’t mention that household waste is a substandard fuel. The World Energy Council found that, kilogram for kilogram, waste produces less than one-third the energy of coal and up to one-sixth the energy of natural gas while producing many times the amount of pollution. [13] Here in Aotearoa New Zealand, we currently produce 80% of our electricity from renewable sources. And, we have a plan to increase that to 100% by 2035. [14] Waste-to-energy incinerators compete with our renewable energy goals and undermine our commitment to a low emissions economy.

INCINERATORS DESTROY VALUABLE RESOURCES
Our society is fast becoming aware than our finite planet does not have an unending supply of natural resources. At the same time, we’re learning the importance of protecting and recirculating our resources. Governments, businesses and communities everywhere are looking for better ways to encourage people to refuse, reduce, redesign, reuse, repair, refurbish and recycle the things we use to make sure our resources are not destroyed. Incinerators work in direct conflict with these zero waste objectives.

INCINERATORS DESTROY JOBS
A key selling point used by incinerator companies is that they create jobs. Disputing this argument, the EU social enterprise reuse, repair, and recycling group, REUSE, recently found that for every job that the incineration industry might create, recycling centres create 36 jobs and reuse activities create 296 jobs. [15] Materials recovery and recycling services are set to become a rapidly growing sector in the country as our society moves towards a post-waste circular economy. Incineration undermines this plan.

INCINERATORS DESTROY ZERO WASTE EFFORTS
While we accept that waste is a problem, we know that incinerators aren’t the answer. Here in Aotearoa New Zealand, we can address our waste issues in regenerative ways that preserve rather than destroy valuable resources, prevent pollution, produce sustainable and innovative products and material systems, create jobs, and invigorate a zero waste circular economy. To help achieve this goal, we hope you will join us in opposing waste-to-energy incinerators in Aotearoa New Zealand.

Footnotes: https://tinyurl.com/y5chaw5k