



Building strength in our communities  
to face the challenges of  
peak oil and climate change

## **Scottish Government role of incineration in the waste hierarchy - review: Call for Evidence**

### **A response from Transition Black Isle**

#### **Summary**

**To maintain or expand incineration facilities in Scotland, incineration must be shown to be safer than and more cost effective in energy generation than committing the waste to landfill. The financing of all waste processing must be examined on the basis that future life choices to meet Net Zero will result in less waste and less overall energy requirements.**

#### **Cost-effective energy from Incineration**

Transition Black Isle recognises that one approach to reduce fossil fuel use is to maximise the energy embedded in waste. The whole operation of collecting, transporting, and processing the waste and then capturing the energy must produce a net gain in energy without deleterious side effects and be at an acceptable cost. Acceptable cost when compared with the costs and benefits of landfill operations, and the cost of generating the energy that would have been delivered through incineration by other renewable means.

#### **Reducing waste should be the foundation for future incinerator planning**

Before embarking on a major financial appraisal of incineration at a time when Net Zero targets will become ever harder to meet, it is important to engage vigorously with producers and consumers to reduce the amount of waste they create. The domestic, agricultural and construction sectors of the economy are particularly relevant. The financial assessment of any incinerator project (capital and long-term recurrent costs) should not be calculated assuming that there will be constant or increasing waste feed over the years. Rather, the scale of incinerator projects should be assessed in the light of optimistic responses to reduce future waste.

#### **Food waste needs tackling in rural communities in the Highlands**

Transition Black Isle is rooted in the Highlands where food waste is sent to landfill while in the City of Inverness such waste is composted. The Highland Good Food Partnership is trying to get the Highland Council to fund community-scale food waste composting, which in other parts of Scotland has resulted in a reduction in food waste by a third. Currently there is a rural exemption from the general requirement for local authorities to collect food waste separately. As a result, Inverness is the only part of the Highlands where food waste is collected; in all other parts of the Highlands it is treated as residual waste, and would be part of the feedstock for the proposed incinerator in Inverness. Transition Black Isle suggests that Highland Council delivers pilot programmes for waste reduction targets in various Highland Communities.

#### **Consult very widely and keep the public informed**

As the review gets underway, Transition Black Isle requests the widest possible involvement of academics and companies with expertise in energy from landfill, experts in public engagement, experts in public health (as incinerators produce toxic particles and aerosols), experts in energy transfer, and experts in commercial scale composting. The whole appraisal should be collaborative and wide-ranging. The public will wish to be updated regularly on the developments and public consultations should continue.

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