



scottish  
environmental  
services  
association

7 October 2020

Mr Iain Gulland  
Chief Executive, ZWS  
By e-mail only

Dear Iain

### **THE CLIMATE CHANGE IMPACTS OF BURNING MUNICIPAL WASTE IN SCOTLAND**

SESA is deeply concerned by the publication of ZWS's recent report on the carbon impacts of EfW. Its findings not only bear little resemblance to the economic and practical realities of waste management in Scotland but, more concerningly, advocate an approach to the management of residual waste which cuts across a decade of waste policy development and contradicts the waste hierarchy. The report's key findings appear to be based on flawed assumptions, and are simplistic, misleading, and serve to undermine the industry's attempts to divert waste away from landfill at a crucial point when the industry is geared up to secure compliance with the impending landfill ban.

Our industry is fully committed to meeting net zero and we of course welcome reasoned analysis of the carbon impacts of waste management and potential strategies to mitigate them. However, a report which essentially advocates continued reliance on landfill disposal (via pre-treatment, an option which has proven a costly failure where it has been tried elsewhere) as playing a major part in serving Scotland's future waste management needs does little to advance the debate.

While fully appreciating the hypothetical nature of the research, we nonetheless suggest that it would be rather naïve not to expect the release of such a ZWS/Scottish Government branded report into the public domain to generate some controversy. We therefore kindly request a meeting at your earliest convenience to discuss the report and to help us better understand ZWS's position on Scotland's future residual waste management requirements.

Please get in touch with Stephen Freeland to arrange, or for any further information that might be useful at this stage (020 7591 3218, [s-freeland@esauk.org](mailto:s-freeland@esauk.org)).

Yours sincerely,

A handwritten signature in black ink that reads "Michael Tracey". The signature is written in a cursive style with a large, prominent 'M' and 'T'.

Michael Tracey

cc: Janet McVea, Scottish Government