

Rt Hon Caroline Spelman MP
Secretary of State
DEFRA
Nobel House
17 Smith Square
London SW1P 3JR

28th September 2011

Dear Mrs Spelman,

Re: Environment Agency threat of ‘Regulatory Capture’ in respect of Incinerator Bottom Ash (IBA) and implication of tax loophole

I am writing to you in my role as Chairman of the Buckfastleigh Community Forum, the well-supported community group of a small town of nearly 4,000 people on the southern edge of Dartmoor in Devon.

Our concerns relate to a situation in the waste industry here in Devon that has come to light as the result of a current planning application to process Incinerator Bottom Ash (IBA) at an old quarry here in Buckfastleigh.ⁱ Although this is an issue that directly involves DEFRA, I have also sent a copy of this letter to Danny Alexander MP in his role as Chief Secretary to the Treasury as there is the issue of a potential £500mn corporate tax avoidance loophole being created that would appear to warrant further investigation.

Specifically our concern relates to how municipal waste Incinerator Bottom Ash (IBA) is treated by the Environment Agency. The current planning application is to process IBA that is proposed to come from a municipal waste incinerator (currently in the planning stage) at Devonport docks in Plymouth, some 25 miles away from Buckfastleigh.ⁱⁱ Both applications are being made by the newly created UK subsidiary of the German energy conglomerate MVV Umwelt.

There is a great deal of opposition to the plans in Buckfastleigh. In helping the community oppose the application I have undertaken extensive and detailed research on IBA, and spoken to many people who have concerns both locally, around Devon and nationally.

There is a fear here in South Devon that the Environment Agency is slowly being subjected to “*Regulatory Capture*”. My background is as an economist and I believe symptoms of regulatory capture are fairly easy to spot. This is incredibly important of course for various reasons, not least that the environmental aspects of planning applications are deemed to be the domain of the Environment Agency Permitting process, and not the Local Planning Authority. Industry “*capture*” of this part of the process would threaten to make a mockery of the whole planning process.

Need for “precautionary principle”

We do not believe the Environment Agency has ever turned down an application for a waste incinerator, even ones that have gone on to create *significant* public health risks. It is officially acknowledged that *all* incinerators create some kind of public health risk.

There has also been two significant pollution incidents in recent history where incinerator ash was involved. The Byker allotment environmental disasterⁱⁱⁱ saw highly toxic incinerator ash, which had been signed off by the Environment Agency, spread on allotments poisoning the land for generations.

In 2007 the Tesco Gerrards Cross tunnel collapse saw thousands of tonnes of toxic ash-based secondary aggregate (which had been signed off as inert by the Environment Agency) dumped without permission on farmland outside Amersham in Buckinghamshire.^{iv} Tesco’s defence was that the Environment Agency had signed off on the ash. Independent testing showed it contained high levels of toxicity. The BBC went on to explain that “*Worryingly the Environment Agency claim they have no jurisdiction over the incinerator ash once it has been incorporated in other building aggregate - officially it ceases to be defined as incinerator waste.*”^v

With these incidents in mind and an apparent “*pass the buck*” mentality when incidents do occur, the necessary “*precautionary principle*” is paramount when determining Environmental Permit applications. This appears to be even more true when a new operator is coming to the country who appears to be attempting to push the limits of recognised legal obligations on waste.

Buckfastleigh is already regarded by government statistics as being a deprived area in terms of health and wellbeing. The economic and social wellbeing (as well as the sustainability of the community) is now further threatened by the current planning application. There is a belief in town that the community is being disenfranchised further by this application which appears to contradict government guidelines on not exacerbating indices of deprivation within their waste plans.^{vi}

The town is somewhat at the mercy of the Environment Agency in this regard. Overt public accountability needs to be ensured in this matter. We are concerned that any consultation that takes place with the Environment Agency is unlikely to cause them to deviate from existing policy which (in as far as a policy is discernible) appears to do little to promote aims of sustainability, or protect our town, our environment or our health.^{vii}

“Light-touch” regulatory regime

We note that the Environment Agency has decided to increasingly move to a “*light touch*” regulatory model, partly as a response to necessary central government budget restraint.^{viii} Primarily this involves a much greater focus on self-policing.

The Agency note on their website that *“Waste management regulations, which mainly fall under the EU Waste Framework Directive, are designed to protect human health and the environment. In doing so, however, they can impose administrative and legislative burdens on business.”*

The Agency have therefore started a project to help businesses: *“Where possible, we produce a quality protocol for each waste material, which clearly explains what has to be done to produce a fully-recovered, non-waste, quality product.”* Indeed *“The project is so successful it was 2009 winner in the 'better regulation' category of the UK's premier cross-industry accolades, the National Business Awards.”*^{ix}

It is possibly a little cynical, but winning an award from business for better regulation in a new *“light touch”* regime gives a sense of consternation when such important issues as health and environmental wellbeing are concerned.

Our primary concern in Buckfastleigh is with the categorisation of the IBA that is proposed to come from the Devonport incinerator plant. MVV do not currently operate any sites in the UK. Devonport is their foray into the perceived UK growth market as their dominant home market in Germany now suffers waste incineration overcapacity. Despite being a new entrant, they claim on their website that *“MVV Environment has already begun to play an important role in shaping the debate in the UK on how to best to manage waste in a sustainable, long-term fashion.”*^x

Incinerator Bottom Ash - win/win/win for downgrading to “inert”?

The debate does seem to have been shaped very conveniently for companies that produce hundreds of thousands of tonnes of IBA each year. I would note that IBA represents about 25% in weight of the waste stream incinerated, or approximately 40-50% in volume (if the waste were compacted)^{xi}. Incineration clearly fails to address the issue of constrained landfill.

This IBA, under planning proposals currently live in the UK, would generate possibly as much as £500mn a year in tax revenue (paid by corporations) by the year 2015 if it was categorised as *“non-hazardous”* waste^{xii}.

Downgrading the waste to *“inert”* would not only save half-a-billion pounds in tax, it would also flatter recycling rates of mass burn municipal waste incinerators. Although the local authorities clearly see a benefit in this flattering of their recycling rates, it distorts competition and industry growth, suppressing technical innovation in the field of waste management.^{xiii}

By reducing the threshold of toxic testing the problems of achieving recycling targets, avoiding landfill, and multi-national businesses avoiding landfill tax can all be magically made to go away.

The UK subsidiary of the French company Veolia (who already operate UK waste incinerators) claim on their website that “*using it [IBA] as a secondary aggregate makes space available for other wastes, as well as avoiding the landfill tax liability.*”^{xiv}

Veolia continue that “*IBA is derived from waste so under European and UK regulations, despite being treated, it remains a (non-hazardous) waste until it is put into the final application.*”

They also state that “*Our processed IBA meets the requirements laid down by the Environment Agency and is not hazardous*”. Please note their term “*not hazardous*”, describes what it is **not**; not what it is - which is a highly toxic cocktail of heavy metals and oxides, poisonous to both humans, animals and the environment.

UK Waste Stream is heterogeneous

MVV Environment are new to the UK market. Although undoubtedly experienced in their home market of Germany, they have no experience of the UK waste stream. The UK waste stream is far more heterogeneous than in Germany. Germany’s recycling rates are over 60% and are actually being held down further by the requirement to fill incinerators with waste to burn as these incinerators have become strategic power plants. Incinerator plants in Germany, Sweden, Denmark, and the Netherlands are now forced to import waste from abroad merely to keep the home fires burning.^{xv} The levels of pre-sorting of waste are far more comprehensive in Germany and other European countries who have the legacy of a historically adopted incinerator model. This would indicate a likely greater homogeneity in the residual waste being burnt in MVV’s incinerators in Germany.

The proposed Devonport incinerator will be burning a combination of municipal waste from Plymouth and Torbay where recycling rates are around 30%, along with unsorted Commercial & Industrial waste. The waste will be far more heterogeneous than waste burnt in Germany. The potential for hazardous and toxic elements in this unsorted waste is very apparent.

The apparent lack of the precautionary principle in the proposed Devonport incinerator is even more glaring given the availability of simple and robust technology for the pre-sorting of waste (including the sorting of “*black bag*” domestic waste) which is not being used on site.^{xvi}

Scale of tax avoidance

Substantial amounts of corporate taxes could be avoided by multi-national companies if IBA is downgraded and categorized as “*inert*”. Tax avoidance is described as a “*benefit*” by the Environment Agency on their website, although it is not quite clear why the Environment

Agency should be seen to be encouraging multi-national corporate tax avoidance so overtly. This business friendly regime could deprive the Exchequer at a crucial time.

It is our estimate that MVV would avoid approximately £5,000,000 a year in landfill taxes on this one site in Buckfastleigh alone if the IBA waste is categorized as “*inert*”. Although MVV claim in their PR literature that this is a “*valuable product*” they appear to be paying the proposed quarry operator to take this waste off their hands (the contract details have been kept secret so this cannot be confirmed).

The storage capacity in the quarry in this instance is likely to be over 200,000 tonnes (and possibly far more)^{xvii}; if it is infilled with IBA, it would very probably be categorized as “*quarry engineering*” rather than landfill, thus avoiding tax. This would potentially avoid up to £20,000,000 in tax payments by our estimates. If the quarry owner’s estimates of the capacity for landfill are true, this figure would be more like £100,000,000 over the life of the contract.

The secretive contract MVV have signed with the South West Devon Waste Partnership (according to publicly available statements in The Final Business Case document for the Devonport incinerator) states that “*The Payment Mechanism encourages MVV to meet its guaranteed landfill diversion target of 97%*. This implies that there are financial incentives being paid directly to MVV (with tax-payer funds) to encourage the downgrading of IBA to an “*inert*” waste stream, regardless of its toxicity and content of heavy metals.

Current status of IBA

On their website, the Environment Agency state that (last updated September 19th 2011)^{xviii}:

“Through the Waste Protocols Project we are in the process of gathering evidence on standards the material meets, markets it may be able to exploit, and most importantly any potential impacts on human health and the environment.”

The current status of IBA is that:

“A technical advisory group (TAG) has been established which is currently pooling evidence to demonstrate that end-of-waste criteria can be met. We are working closely with industry to obtain additional data to help this process.”

The existing European Waste Protocols denote IBA from co-incinerated waste as a “*mirror entry*”. This means that it needs to be regularly tested and analysed to ascertain whether or not a batch is to be classified as “*hazardous*” or “*non-hazardous*”.

Indeed the UK waste company Viridor in July this year stated that: “*incinerator bottom ash (IBA) is classified on The European Waste Category as a 'mirror entry', hence must be subjected to a hazardous property assessment in accordance with the UK guidelines, as detailed in Environment Agency guidance. If IBA is found to possess any one of the fourteen hazardous properties, it will then be classified as a hazardous waste*”^{xix}

The applicant for the Buckfastleigh site, MVV Environment, despite being pressed, has so far given absolutely no comfort whatsoever about the testing procedures which will be undertaken (we presume) as part of any planning permission granted and specifically dictated by the Environmental Permitting process . They dismiss legitimate questions from the local community, and appear to be hoping to dismiss and distract from public concern and are hiding behind the Environment Agency as the ultimate arbiter.

In their 1,000-odd page planning application and Environmental Statement^{xx} submitted to Devon County Council for the proposals in Buckfastleigh, scant regard is paid to IBA. On page 18 of the Planning Supporting Statement, paragraph 4.3.5 they make the potentially misleading statement that “*IBA is classified as an inert material under Regulation 7(4) of the Landfill (England and Wales) Regulations 2002.*”

They go on to claim that “*its total leachability and pollutant content and the ecotoxicity of its leachate are insignificant and, in particular, do not endanger the quality of any surface water or groundwater.*” This claim appears to be highly speculative at best, and possibly very misleading, particularly for a company that has never operated in the UK waste incineration market. It also flatly contradicts the categorisation of waste stated in Devon County Council’s Waste Local Plan (Adopted 2006). It appears they are doing this because they believe that the planning application will receive far more public scrutiny than will the Environmental Permit application.

The fact that MVV repeatedly quote a regulation from 2002 that has been superseded comes across as slightly disingenuous. The statement “*MVV Environment has already begun to play an important role in shaping the debate in the UK on how to best to manage waste*” seems rather uncanny in its unintended accuracy. Certainly there does not appear to be any respect of the necessary “*precautionary principle*” in this matter.

The claim that the IBA “*is inert*” is a statement that has been repeated many times by MVV in their public announcements and PR. We would presume they have repeated this claim when lobbying both local elected representatives and regulatory authorities. A representative of the Environment Agency attends a Local Liaison Committee that has been set up between local residents and the company. However, the subject of IBA toxicity and testing has been subtly removed from the agenda for discussion.

It is not clear that the EA are going to challenge MVV on their claims, thus potentially the Environmental Permit application process could be perceived to be nothing but a corporate whitewash, and a threat to human health and the environment.

On reading the small print in MVV’s thousand pages of Environmental Statement it is clear that they will regard the raw IBA trucked to site as “*non-hazardous*” (without giving any details of any testing regime they undertake - it seems the presumption is that testing will not be necessary). They will then let it “*weather*” in the quarry where they say it will be inert - again no details of testing. They collect the leachate, and they will apply to discharge this toxic leachate from the IBA into a local “*Protected*” water course, the Dean Burn.^{xxi} No

details whatsoever have been given about the toxic elements and compounds likely to be discharged into this River Dart tributary.

Industry Lobbying

The industry lobby group, the Environmental Services Association (ESA) has subjected the Environment Agency to a lot of lobbying in the last few years. The ESA have demonstrated a desire to lower regularity and threshold testing of IBA. This is in order to have the waste reclassified as “*inert*” in order to save the industry £500mn a year in tax.

In October 2010 the ESA submitted a document called *A Sampling and Testing Protocol for the Assessment of Hazard Status of Incinerator Bottom Ash*, outlining their proposed testing protocols. On November 8th 2010, Martin Bigg, Head of Industry Regulation at the Environment Agency replied stating that:

“We have reviewed the document and have no comments on the content. We agree with the approach set out within the document for sampling and testing of IBA produced by MWI for the purposes of hazardous waste classification. We understand that this document supersedes all previous reports drafted, for example the draft Direct Testing Report.

“We would like to review the progress with the sampling and testing of IBA in about 6 months from the start of its implementation in January 2011. Please let me know if this is acceptable.”

Anecdotally at least, there is an implication that the ESA - representing the industry - are actually telling the EA - the regulator - what to do.

After lengthy discussions over several years between the ESA and the EA (none of which it appears has been publicly documented^{xxii}), the EA appear to have taken some kind of stance that supports the ESA’s original desire to move towards downgrading the status of IBA and the threshold testing for toxicity. The EA are taking a very hands-off approach to the industry’s desire to downgrade IBA. An area where “*light touch*” regulation would not appear to be appropriate.

The Environment Agency endorsed (although not publicly as we are aware) the more relaxed sampling methodology the ESA have come up with. As far as we understand, this testing is totally self-policed, and the Environment Agency do not even need to be shown the results of this occasional testing.

It is very important to ensure public confidence in the regulatory system. On speaking to many people in and around Devon generally, it strikes me that there is *very little* confidence expressed in the Environment Agency.

Threat to due process

It appears that there is a threat to due process being followed, and we are extremely keen as a community to ensure that the Environment Agency is publicly and overtly held to the highest account in its dealing with IBA in this regard. Clearly the potential to avoid an approximate £5,000,000 a year landfill tax bill on this one project alone is incentive enough for MVV to hold onto the claims that IBA is “*inert*”, regardless of any payments being made to the company with public money by the South West Devon Waste Partnership (SWDWP).

The way forward

We are fortunate enough to have a former Professor of Chemistry in Buckfastleigh who is horrified by the proposals as he actually understands what is in IBA. He has already seen to it that the community have the ability to have professionals undertake sampling and testing of the IBA on the community’s behalf. Given access to site, we can help ensure that no rules are being circumvented.

You may be aware that the organisation UK Without Incineration is currently campaigning for the level of landfill tax specifically on IBA to be raised, in order to better reflect the economic costs of incineration versus other more sustainable methods of waste disposal.^{xxiii}

The significant amount of tax raised from this proposal could also be used to finance the Environment Agency and allow it to be more pro-active and hands-on in dealing with threats to human health and the environment as we come to terms more openly and honestly with our waste problem in the UK. This is as opposed to the “*light touch*” regime that risks the catastrophic failure of the regulatory system. I worked in the financial services sector in London for nearly twenty years and I am very well aware of what a clearly flawed “*light touch*” approach to regulation is capable of causing, even more glaringly when the warning signs were highlighted and ignored on numerous occasions. A “*pass the buck*” mentality and lack of accountable structure ensures no-one will ever be properly held to account for this disaster.

Please let us learn the lessons of history. Money lost can be written-off and debts inflated away, but the environment only gets one chance. The overriding concern of planning and economic growth necessarily now revolves around environmental sustainability. This is being dictated not just by necessity and national government, but by European law and UN guidelines. Surely a better regulated industry from the perspective of the end product - a healthy and sustainable environment - is of far greater importance than “*better regulation*” from the perspective of lower cost and convenience to industry.

It could be argued that the current regime that the Environment Agency is tacitly endorsing, encouraged by incinerator companies and industry lobbyists, is far from the Zero Waste regime that legislation demands, but merely a re-classification of toxic, and potentially hazardous waste into secondary aggregate. An aggregate where there is actually no indication of sustainable demand. Is Devon to be subjected to such ingenious ideas as those in Jersey

where secret plans to create a new artificial headland from unwanted IBA were announced by the authority responsible for commissioning the incinerator?^{xxiv}

This whole process is strangling the growth of other technologies in the UK. Technologies which are far more sustainable than the outdated technology of incineration.^{xxv} Incineration and its ash residue is threatening environmental pollution and the health and sustainability of local communities. It is depriving the Treasury of much needed funds - nearly half a billion pounds - in the process. This aspect alone warrants further investigation.

If there are genuine reasons why IBA should be downgraded from a “*mirror entry*” potentially “*hazardous*” waste to an “*inert*” product, and less tax be paid on it, then there should be a very thorough and public review of why this should be the case. There should be a comprehensive publication made available to educate interested parties outside of industry about exactly why this is the case and how that decision was reached. This would detail correspondence between industry lobbyists and the Environment Agency, as well as clearly stated targets and levels for the various toxic elements and compounds that can be found in IBA, how these are supposed to be reduced by “*weathering*” and where in fact these toxins go in the “*weathering process*”. There should be specific political accountability for this decision.

The minimum aim of any regulatory system should be the establishment of public confidence in the industry it is regulating. If such a detailed review were carried out, and the results made available in a clear and comprehensive manner to the public, it may enable the public to have some confidence that indeed the EA was not at risk of being “*captured*” by opportunists in industry finding another loophole to save costs at the expense of the environment and human health.

As a group, the Buckfastleigh Community Forum is exactly the kind of organisation that the new Localism Bill promotes in terms of citizens taking a role in the Big Society and making their town a better place to live. But in order for this to work, communities still need help and guidance.

1. Please can you assure us that your department will investigate these claims, and see to it that a much more comprehensive and accountable public statement is made about the treatment of IBA. This public clarity is currently severely lacking, allowing industry to fill-in the blanks as suits them.
2. It is probably advisable that a clear audit trail of public accountability is established as soon as practicable. If there is another serious pollution incident involving incinerator ash a recognised structure of accountability should be available for immediate investigation.
3. We believe an investigation into the creation of a potential corporate tax-loophole that could cost the Treasury £500,000,000 a year in tax revenue should also be carried out, possibly including the introduction of a specific new tax on IBA in order to align industry and government incentives more appropriately.

4. We also want to ensure that a thorough and publicly accountable consultation process (involving feedback, response and action) takes place in terms of determining the Environmental Permit application that will likely be applied for in relation to the proposed development in Buckfastleigh (if planning permission is granted).

Yours sincerely,

Neil Smith

Chairman, Buckfastleigh Community Forum

www.community.buckfastleigh.org

community@buckfastleigh.org

Copied to:

Danny Alexander MP, Chief Secretary to the Treasury

Mary Creagh MP, Shadow Secretary of State for DEFRA

Angela Eagle MP, Shadow Chief Secretary to the Treasury

Richard Benyon MP, Parliamentary Under Secretary of State for DEFRA

Mel Stride MP for Mid Devon

Dr Sarah Woolaston MP for Totnes and South Hams

Alison Seaback MP for Plymouth, Moor View

Andrew Smith MP for Oxford East

Appendix and Notes

ⁱ <http://www.devon.gov.uk/appref?id=3919&date=2011-08>

ⁱⁱ The application for the proposed waste incinerator is being made by the company MVV Environment, a UK subsidiary of the German energy conglomerate MVV Umwelt. The waste incinerator would take the municipal waste from all over South West Devon, as well as unsorted Commercial & Industrial waste from wherever it can be sourced in order to fill the incinerator's 250,000 tonnes capacity.

The proposal to build the Devonport incinerator is being made with the backing of the South West Devon Waste Partnership (SWDWP). This is with PFI funding being granted despite the applicant appearing to have not fulfilled statutory guideline requirements for being awarded PFI funding; for instance, the lack of public demonstration of value for money, the lack of demonstrating a consensus for the highly contentious proposals, or not adequately engaging with the local community or genuinely seeking alternative solutions.

ⁱⁱⁱ <http://www.greenpeace.org.uk/media/press-releases/official-report-into-newcastle-incinerator-ash-dumping-provokes-fears-of-more-dumping-scandals>

^{iv} <http://www.theyworkforyou.com/whall/?gid=2007-01-23b.435.0>

<http://www.theyworkforyou.com/whall/?gid=2007-01-23b.435.1>

^v http://www.bbc.co.uk/insideout/london/series11/week7_designer_homes.shtml "Greenpeace have tested some of the material from the site and their test results show high levels of lead and dioxins." Scientist Dr Paul

Johnston believes that "some of the other chemicals (in the material tested) that are present are known carcinogens". He also said "the levels of lead that are present in this material would certainly give me cause for concern"

^{vi} Whitecleave Quarry in Buckfastleigh is not in the adopted Waste Local Plan for Devon - this is an opportunistic application.

^{vii} From reading about earlier Environment Agency consultations with regard to permit applications for waste incinerators and their derivative products (ash), it appears that consultation in this context means telling the public why their legitimate concerns are unjustified. In the Environmental Permit application for the nearby New England Quarry incinerator, the Environment Agency specifically refused to put the permit application on-line despite my requests. Many people do not have the time or opportunity to travel 10-15 miles to spend several hours in council offices reading these applications. In this day and age, accountability is not possible without a full, and open public consultation including on-line documentation.

^{viii} http://businessdatabase.indicator.co.uk/enforcement/environment_agency_goes_for_light_touch_approach/UKTAENAR_EU050403/67/search?&t=182&k=1519

^{ix} <http://www.environment-agency.gov.uk/business/topics/waste/32154.aspx>

^x http://www.mvv-environment.co.uk/environment/web/de/mvv_environment/starting_mvv_environment/mvv_in_the_uk/MVV_in_the_UK.jsp

^{xi} Source: http://www.ecomed.org.uk/content/IncineratorReport_v3.pdf

^{xii} Based on over 5mn tonnes of IBA being produced (from around 100 incinerators) with a landfill tax rate of £80/tonne or more.

^{xiii} This is an industry that Britain could and should be exporting our expertise to the world in, thus providing a much needed boost to entrepreneurial business and the economy. We should not be importing outdated technology from abroad.

^{xiv} <http://www.veoliaenvironmentalservices.co.uk/Main/Forums-and-Blogs/Veolias-view/Incinerator-bottom-ash/>

^{xv} For example, <http://www.irishtimes.com/newspaper/world/2011/0914/1224304081648.html>

^{xvi} The lack of ambition in recycling targets in Plymouth and Torbay is also a concern, leaving a feeling that the PFI funding tail is wagging the dog and the desire to build an overcapacity 250,000 waste incinerator is a result of corporate demands, not identified local needs. The potential to create more jobs locally in Devon to fulfil a greater level of pre-incineration sorting is being ignored.

^{xvii} The owner of the quarry stated that it has capacity for 1,000,000 cubic-metres of potential for "inert landfill" in a 2006 statement to Devon County Council. On that basis, the quarry could see a tax avoidance of around £100,000,000 over its life.

^{xviii} <http://www.environment-agency.gov.uk/business/topics/waste/114416.aspx>

^{xix} Viridor is currently involved in plans to build another municipal waste incinerator just ten miles from the proposed Devonport incinerator. This information was given in response to R19 requests for further information on their planning application.

^{xx} http://www.mvv-environment.co.uk/environment/web/de/projects/startingprojects/whitecleaverecyclingcentre/applicationforplanningpermission_1/startplanningapplicationwhitecleave.jsp

^{xxi} This is not only an Environment Agency Protected Area for Economically Significant Freshwater Fish (Salmonoid), but where the European protected species of otters live. It is a tributary to the River Dart, and internationally important river of immeasurable importance to the South Devon economy. It also provides one source of drinking water to over 100,000 people in Torbay and Totnes.

^{xxii} See various correspondence on <http://andrewwood.members.gn.apc.org/ecotoxicwaste/index.html>

^{xxiii} <http://ukwin.org.uk/>

^{xxiv} <http://www.thisisjersey.com/2011/07/19/plan-to-dump-incinerator-ash-on-artificial-headland/>

^{xxv} Plasmification for instance, developed to a robust level in the UK, is capable of reducing the quantity of input waste to 1%, and produces a truly inert vitrified product that does not leach heavy metals. Incineration reduces the input waste to roughly 28%, of which 3% is highly toxic and 25% leaches heavy metals into the environment.