

## **ToxicoWatch intervention on D10 guidelines on Incineration (May 3, 2019)**

### **Conference of the Parties to the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal Fourteenth meeting**

Geneva, 29 April–10 May 2019

Thank you, Mr. President for giving the floor to ToxicoWatch from The Netherlands.

As awareness of the health impacts of unintentional POPs such as dioxins and furans has grown, health based thresholds such as tolerable daily intakes of dioxins have recently been set dramatically lower by European Food Safety Authority. So dioxin emission limits and residue thresholds need to be updated and lowered. It has become apparent that any additional dioxin contamination of the environment and the food chain comes with great risks to human health.

In practice, incinerators operate outside optimal conditions, with failures such as stack bypass, stack dumping - during maintenance, start up and shut down – and emit dangerous levels of dioxin that are not well addressed in the guidance and are not regulated at all. In respect of UPOPs emissions and releases, the D10 review group's work, could benefit from closer engagement with the Stockholm BAT BEP and Dioxin toolkit experts to address synergies.

The hazardous residues of dioxin in bottom ash and fly ash are not adequately controlled and in many locations are leading to food chain contamination. This issue is poorly addressed in the updated guidance. Also the guidance lacks any discussion on the individual and cumulative impacts of incineration of waste on the environment and the concept of the circular economy and this must be addressed.

Incinerators are a dated, combustion-based technology that is ill-suited to a modern, low carbon, circular economy where recycling and re-use must be prioritised to conserve resources instead of destroying them while generating UPOPs. The updated D10 guidance should instead give parties an accurate account of the real capital cost, ecological and human impacts of incineration.

Thank you Mr President.