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**Call to Suspend the Asian Development Bank's
Board Deliberations on the Energy Policy 2021**
Stop Burning and Transition to a Just Circular Economy

We, the Global Alliance for Incinerator Alternatives-Asia Pacific, strongly urge the Board of Directors of the Asian Development Bank to conduct a more rigorous examination of the final revised version of the ADB Energy Policy(R-Paper).

After months of advocacy, the ADB has finally introduced restrictions for investments on Waste-to-Energy(WTE)incineration stating that:

"ADB will support waste-to-energy investments for heat or electricity, provided that the feedstock for combustion results from a prudent order of waste management priorities. Waste-to-energy investments can improve local environments and health in cities and rural areas by removing the environmental hazards caused by open waste dumping and open burning. ADB will support projects that promote a circular economy and consider holistically the order of priorities—first reducing waste generation, then exploiting the options for reusing and recycling materials, then using waste to recover energy or usable materials, followed by sanitary engineered landfilling as the last option. ADB support for waste-to-energy investments will promote sustainable livelihood opportunities for the poorest of the poor working along the waste value chain and at landfills. The potential environmental and social impacts of waste-to-energy investments will be managed by using the best internationally available technologies in the design and operation of such projects in accordance with international conventions." (Paragraph 73, R-papert 2021 ADB Energy Policy)

We are firm that WTE incineration should not have a place in ADB's Energy Policy aimed at accelerating Asia's energy transition. Investment in WTE incinerators induces the exploitation of resources in the face of a climate emergency. Instead of prioritizing investment in waste reduction measures and reuse-refill models, ADB chooses to promote expensive and harmful WTE incineration as a clean energy option to governments looking for "cost-effective" waste management solutions. Yet, several studies show that WTE incineration plants burn mostly recyclable or compostable waste² which can be addressed through cost-saving, community-empowering, environmentally-sound and climate-friendly zero waste solutions.

Burning plastic waste through WTE incinerators is a climate disaster. A metric tonne of plastic waste burned releases about a tonne of CO₂ into the atmosphere. By 2050, the production and disposal of plastic could generate 56 gigatons of emissions, covering as much as 14 percent of the Earth's entire remaining carbon budget.³

¹ Asian Development Bank, Energy Policy: Supporting Low-Carbon Transition in Asia and the Pacific (2021), <https://www.adb.org/documents/energy-policy-supporting-low-carbon-transition-asia-and-pacific>.

² UNEP publication Waste-To-Energy Considerations for Informed Decision-making <https://wedocs.unep.org/bitstream/handle/20.500.11822/28413/WTEfull.pdf?sequence=1&isAllowed=y>

³ Lisa Anne Hamilton and Steven Feit, *Plastic & Climate: The Hidden Costs of a Plastic Planet* (Center for International Environmental Law, 2019), <https://www.ciel.org/plasticandclimate/>.

ADB has committed to significantly increase financing in climate change mitigation and adaptation, and yet it ironically maintains support for WTE incineration, which undermines global efforts to reduce plastic waste and to reach the 1.5°C global warming limits.

The restrictions put forth in paragraph 73 are belated and insufficient to address the full risks from WTE incinerators. During the past decades, the Bank has approved WTE incineration projects and recommended their inclusion in national waste management and renewable energy plans. Through loan packages, grants and technical assistance, it has impaired governments from achieving national climate and recycling goals, incineration bans, green jobs generation, and health objectives.

We urge the Bank to delay the voting and consider these critical recommendations:

- 1) Suspend all WTE projects in ADB's pipeline projects to re-assess its compliance with the restrictions set forth in paragraph 73.
- 2) Commit to a gradual phaseout from WTE investments in the next five years;
- 3) Declare a no-go zone on WTE investments in small island developing states which by their vulnerable nature have weak capacities to regulate the environmental, social and fiscal risks from WTE projects in the period of precarious COVID-19 recovery.
- 4) Align paragraph 78 with the IPCC guidance on renewable energy that only organic fractions of municipal waste are classified as sources of renewable energy, which can be safely treated through decentralized, anaerobic digestion systems;
- 5) Ensure that WTE guidance notes complementing the Energy Policy is aligned with:
 - a. the stated precondition on WTE investments on paragraph 73; and
 - b. the IPCC parameters for assessing the feasibility of mitigation and adaptation options⁴; provisions of the Basel (1989), Rotterdam (1998), Stockholm (2001), and Minamata(2013) Conventions on the management of toxic and hazardous byproducts of waste incinerators on the environment and human health; and the ILO guidance on just transition for the protection of the rights of workers in the waste management and recycling sectors⁵.

The Asia-Pacific region is home to Zero Waste solutions. Cities and communities have demonstrated that these Zero Waste strategies are more effective in reducing waste generation, improving collection and recycling rates, and creating jobs. We welcome support for these solutions.

We demand a path in favor of a toxic-free COVID-19 recovery towards a just and climate-resilient future.

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GAIA is a worldwide alliance of more than 800 grassroots groups, non-governmental organizations, and individuals in over 90 countries. With our work we aim to catalyze a global shift towards environmental justice by strengthening grassroots social movements that advance solutions to waste and pollution. We envision a just, zero waste world built on respect for ecological limits and community rights, where people are free from the burden of toxic pollution, and resources are sustainably conserved, not burned or dumped.

⁴ Page 380 of the [IPCC Special Report on Global Warming of 1.5°C](#) laid down six dimensions for assessing the feasibility of adaptation and mitigation options including economic, technological, institutional, socio-cultural, environmental/ecological, and geophysical.

⁵ ILO, Guidelines for a just transition towards environmentally sustainable economies and societies for all, https://www.ilo.org/wcmsp5/groups/public/---ed_emp/---emp_ent/documents/publication/wcms_432859.pdf

