

Interested Party ref: 20032329

I would like to thank the Secretary of State for the letter inviting comments from all Interested Parties in relation to the Residual Waste Infrastructure Capacity Note published on 30<sup>th</sup> December 2024.

**The implementation of the UK Government's Collection and Packing Reforms,** and Defra's determination to moving to a more circular economy, will ensure there is a reduction in residual waste therefore less feedstock availability for municipal waste incinerators already in operation, and those that have already been given both planning permission and acquired their environmental permits.

Defra's reforms such as: **"Extended Producer Responsibility for packaging in 2025, Simpler Recycling for non-micro businesses in 2025, households in 2026, and micro businesses in 2027... and the Deposit Return Scheme for drinks containers in 2027"** demonstrates any previously made arguments about a need for the North Lincolnshire Green Energy Park have now been undermined due to the reduced amount of feedstock that would be available. Defra forecasts in their note that due to the above schemes that **"when accounting for the effects of packaging reforms, municipal residual waste arisings are forecast to decrease from 23.6Mt in 2020 to 19.4Mt by 2035."** This highlights the lack of need for more municipal waste incinerators to be given development consent orders.

It has been noted by Defra in their note that the **"modelling undertaken demonstrates that, following implementation of these policies, there will therefore be sufficient residual waste infrastructure capacity to treat forecast municipal residual waste arisings at a national level."** This clearly supports the idea that further waste incineration capacity is not necessary and that any current or future DCOs will not be necessary for many years to come, if at all. In summary, Defra's forecast is that **"the tonnage of municipal solid waste sent to residual waste treatments is forecast to decrease from 23.6Mt in 2020 to 19.4Mt in 2035"** requiring less need for more capacity and less need for more DCOs for EFWs to be consented. England will have significant overcapacity and projects which are superfluous to requirement.

