

“West Qinhuangdao municipal solid waste (MSW) power generation project ”

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Submitted 25th July 2011

Power generation from waste incineration has been a controversial technology for a long time in China. The environmental pollution and waste of resources caused by waste incineration are catching increasing attention by the Chinese public, media, environmentalists and policymakers. In the last few years, many waste incineration power generation projects in China have caused social tensions and public protests in several cities. Also, excessive discharge of toxic materials, damage to local eco-systems and citizens' health has occurred.

Friends of Nature has noticed that the CDM may provide support to the municipal waste incineration power generation project in the west of Qinhuangdao. We believe that project is very problematic and want to draw the attention of the Executive Board to issues such as illegal site selection, EIA falsification, questionable qualification of the project developer Zhejiang Weiming Environment Protection Co., Ltd, and the foreseeable negative impact on local eco-system and resident's health.

This comment will focus on questioning the integrity and authenticity of the information provided in the PDD and the rationality of its additionality. It will also point out the fact of its direct violation on environmental laws of the PRC.

We strongly suggest rejecting the application of this project on the following grounds:

1 There is severe falsification in the process of Environmental Impact Assessment (EIA), the project's EIA report is not legal.

The PDD did not mention that because of its severe falsifications in the process of EIA, Hebei provincial Environmental Protection Bureau cancelled the confirmation of the project's EIA report on 8 June, 2011.

1.1 There is severe falsification of data in the public participation part of the EIA report

The EIA report of Qinhuangdao West municipal waste incineration power generation stated that the assessment conductor has distributed 100 questionnaires and collected 100 answers from the public. The survey participants all agree on the project's development. But instead the local residents have testified that they have never heard about the questionnaire and never signed it. Except for unchecked two answers, the signatures on the other 98 answers documents are fake. According to the testimony of local residents, the meeting minutes the report used to prove that local residents agreed to build the plant on agricultural land are also falsified.

1.2 In the project's EIA report, the description of the geographical location of the project site is wrong, the description of the current status of local environment is ambiguous, important

information is missing.

In the description of the project's geographical location in the EIA report of Qinhuangdao West municipal waste incineration power generation, there are many points which are not in accordance with the facts while some important facts were disguised, possibly intentionally.

The distance between the project site and the Wuning City is only 7 km, while in the report it was stated as 18.8 km. The distance between the project site and the resident area of Panguanying village is only as little as 510 metres, while in the report it was stated as 750 metres. It is an area with high population density and agricultural activity. It is an important food production area for the region. Such important elements were not reflected in the report.

The report ignored important elements, disguised facts and deliberately neglected environmental protection goals. The assessment is based on incomplete and falsified information. It cannot be accepted as a scientifically credible evaluation.

1.3 The EIA report did not use the latest guidelines and used wrong environmental standards. The EIA Technical Guidelines on Atmospheric Environment (HJ 2.2-2008) replaced the old version (HJ/T2.2-93) on 1st of April 2009. Although the EIA report is marked with the date of March 2009, Hebei's Environmental Engineering Assessment Centre hosted an expert consultation on 31st of March 2009 in order to provide comments for revision. And the report was approved after being revised. It is clear that the report was finished after April 2009, when the new guideline had become effective. HJ/T2.2-93 is no longer valid. Using invalid technical standards is a violation of the Regulation on Construction Project EIA Qualification of the PRC.

Therefore, the EIA report quoted in the D.1 section of the PDD (Page 54) is invalid. Because of this, the statement "The environmental impacts of the project are insignificant." In section D.2 (page 55) does not stand. This is an important mistake of this PDD on factuality.

2. Stakeholders' comments are inconsistent with the facts

According to our investigation, local residents and governments around the project site are in opposition to the construction of this waste incineration power plant. Based on the testimony from local officials and village representatives living near the project site, they would set themselves up against the project to ensure health and safety of local the population. According to the yet incomplete statistics, more than 1500 people and 37 village committee members signed a protest petition against this project. Local villagers even took legal action and submitted the case to the court in January 2011.

However, in the PDD (Page 57) Part E, the investigation results about stakeholders, it is stated that 55 out of 59 people, about 93.22 percent, expressed their support for this project and, no one was against it. This is seriously inconsistent with the facts generated in our investigation.

We claim that the results of the stakeholders consultation were manipulated in the PDD and question the facticity of the following statement in Part E of the PDD (page 56) : ‘...all the participants gained a better understanding of both the project and the CDM, and expressed their fully support for the development of the Project. The outcome of the survey indicated that it is generally believed that the constructions of the Project will contribute to the local environment and to the development of the enterprises and local employment situation.’

3. Potential environment hazards are inhered in the project and listed below:

Due to the fact that household refuse, often also containing harmful waste, is not sorted before burning in China and due to large amount of organic waste content, it has a very low heat value (only about 3.600 kJ/kg FM), and accordingly during incineration POPs like dioxins, furan, and PCBs and heavy metal are emitted. Furthermore, the planned project site will be on the upper hand of predominant wind direction, in vicinity to environment-sensitive locations, and considerably close to residential area and agricultural production base. Dioxins, furan and heavy metal contaminants are susceptible to spread, damaging the health of residents around the project site. It will also certainly have negative impacts on the maintenance and protection of surrounding farm land, water sources and tourism areas (Qinhuangdao is a popular summer holiday location), which cause threats to food safety, including grains, vegetables, and pork, etc.

Therefore, we question the authenticity and scientific base of the statements about local environment impact in the PDD (page 2).

4. The impact on local employment

In China, recycling and waste picking is an important industry, which is mostly carried out by private or individual small businesses (including the informal sector). There are over 1 million people working in the recycling and waste picking sector, a very important component of the urban waste disposal industry. The PDD document does not mention this part of the population, who are also very important stakeholders to be considered in the planning processes.

In fact, the developer of this project intends to incinerate recyclable materials which are contained in the mixed household waste, which would have big impact on the job opportunity of this part of people. We believe the number of people losing their jobs would be far more than the number of people getting new jobs created by the waste incineration plant.

Therefore, the conclusion of the PDD: “Job creation – A large number of local staff will be employed during the construction stage and also to operate and maintain the project”, is not impartial and inaccurate.

5. Irrational baseline setting

Municipal solid waste in China contains large amounts of kitchen waste, according to a study by the World Bank more than 50%. Thus, the emission reduction from biological treatment (such as composting or anaerobic digestion) and recycling of

municipal solid waste is much higher than that from landfill and incineration. The reference cited in PDD (page13) does not contain a list and consideration of biological treatment options methods which are available in China. It is believed that this baseline setting is irrational and does not meet the actual situation of the project site.

Furthermore, from the methodology perspective, there are large loopholes existing in the baseline setting of the waste treatment area. The emission reduction potential of biological treatment is compared to biological treatment itself, while the potential of incineration is compared to that of mixed landfilling without methane capture & flaring or even the use of landfill gas. These two methodologies are not comparable, since the logic of the frame of reference is different between them.

Conclusion

Given the facts and problems stated above, the project is in violation of Chinese Environment Impact Assessment Law and forged in the process. We do not believe that the project qualifies to be registered as a CDM project.

Given the facts and problems stated above, the conclusion in PDD (page 2) that “the project will contribute to the sustainable development of the local” is unacceptable and inaccurate. We therefore request the rejection of this project application. We strong request the EB to show concern about the authenticity of this PDD and investigate whether there has been any incidence of fraud during the process.