Delhi-NCR civil society organizations, communities, and citizens urge the government to scrap the proposed expansion of toxic waste-to-energy incinerator projects in the National Capital Region

The deteriorating air quality and its health hazards across the world has raised the concerns around people's right to breathe clean air. Delhi-NCR, particularly in the winter months, has in fact emerged as a hotspot of toxic air in the global map. The Delhi government has been desperate to find solutions to combat the pollutants causing havoc. Yet, citizens living in Delhi breathe one of the worst air in the world and lose about 12 years of life expectancy to air pollution. Though **Delhi's air pollution** stems from various sources, the contribution from burning about 7,250 tons of unsegregated Municipal Solid Waste daily in the city's four **Waste To Energy (WTE) Incinerators** is often overlooked. Waste-to-energy incineration is the process in which Municipal Solid Waste (MSW) is burnt in a furnace to produce heat. The heat is used to produce steam that drives a generator to produce electricity. But apart from that it also produces bottom ash and fly ash which are hazardous in nature and need a scientific landfill to dispose of. These WTE incinerators pose considerable risk not only to the health and environment of neighboring communities but also to the general population by reducing the Ambient Air Quality. They pollute air, water, and soil by releasing SOx, NOx, PM 2.5, PM 10, HCL, heavy metals, dioxins, furans, etc.

The first WTE incinerator in Delhi was commissioned in 2010 to burn about 2000 tons of garbage per day in Okhla despite public protests against the environmental and health implications of the plant. An inspection by the Central Pollution Control Board (CPCB) found that Okhla WTE incinerator was releasing 800-900% more dioxins and furans, a major carcinogen. Based on the report, the National Green Tribunal slapped a fine of Rs. 25 lakhs on the plant. Despite the poor track record of the Okhla WTE incinerator, the government has given an approval for the expansion of the plant to burn 3000 tons of garbage per day and the residents of Okhla are fighting a Supreme Court case against its expansion. Similarly, in 2021 the Delhi Pollution Control Committee (DPCC) slapped a fine of Rs. 5 lakhs on each of the WTE plants for emissions well above the environmental standards. As anticipated by concerned citizens, doctors from Okhla started reporting unusually high incidences of cancer among people living in the area, apart from asthma and breathing difficulties as confirmed by several studies in various countries. Also, children were likely to have lower lung function and lowered IQs from breathing toxic particles and pregnant women were advised not to live in the area as it could affect the growing fetus.

The most scientific and sustainable approach for environmentally sound management of Municipal Solid Waste (MSW) involves "at source segregation of wastes" followed by decentralized waste processing. The CSIR-NEERI report notes that, "Promoting WTE incineration plants for mixed waste (mass burning), defeats the purpose of waste segregation, which is mandatory, as per the prevailing SWM Rules, 2016. The mass burning of MSW also·defeats the opportunity of Circular Economy for the waste sector." *WTE incinerators are not better than dump yards* as they still need scientific landfills to dispose of, about 35% of the input waste, which is released in the form of toxic bottom ash and fly ash. A study led by IIT-M also

pointed out that burning plastics was the main cause behind reduced visibility in Delhi. The report also noted that it also emits highly toxic chemicals called 'dioxins', which can accumulate in the food chain causing severe problems with reproduction and the immune system.

Burning waste contributes to climate change as they emit more carbon dioxide (CO2) per unit of electricity than coal-fired power plants. The four WTE incineration plants in Delhi spew CO_2, equivalent to the emissions from about 30 lakh cars! The climate action plans of major cities in India including Chennai and Mumbai have clearly recommended against WTE incineration. And one of the five strategies for climate change mitigation in Chennai is to “Change City Strategy Away from Waste-to-Energy and towards Recycling”.

Several WTE incineration projects in India have either failed or are struggling to operate due to the low calorific value of the waste, high operational and maintenance cost and economic unviability, despite substantial subsidies in the form of viability Gap Funding (VGF) of up to 50% of the project cost, low-interest loans, providing processing fees, beneficial electricity generation prices, tax exemptions, providing free land, etc. from the central and state governments. IL&FS's bankruptcy and sale of its assets led to a change in ownership of the Ghazipur waste-to-energy plant in Delhi. Similarly, the annual Profit After Tax (PAT) of the Okhla WTE incinerator has been on a decline. It was Rs. 10.43 crores in 2017-18, Rs. 5.34 crores in 2018-19 which went down further to Rs. 1.94 crores in 2019-20. The WTE incinerator in Narela-Bawana operated by the Ramky group recorded a constantly increasing total income, however, the company’s PAT was still in the negative range in 2020, which indicates that costs and interest payments were still higher than the earnings. Despite being funded using tax-payer’s money, WTE incinerators have failed even financially and also severely impacted public health and environment.

To combat air pollution and deal with poor air quality, the government has revised the Graded Response Action Plan (GRAP) to restrict interstate diesel buses, ban on earthwork/ piling/ demolition/ open trench systems, shifting students to online classes etc. However, there is no mention of the restrictions on the operation of the WTE incineration plants. According to the CPCB classification, WTE incineration is a “red category” industry which has one of the highest Pollution Index score (>60) because of flue gas discharges such as SOx, NOx, HCL, PM, Dioxins and Furans etc, water effluent with toxic pollutants and hazardous bottom/fly ash that needs to be disposed off in a secured scientific landfill. However, against all logical reasoning, plans are afoot to burn an additional 6,000 tons of mixed garbage/day by 2027 in Delhi by increasing the incineration capacity of the Narela-Bawana plant to 5000 tons/day, Okhla plant to 3,000 tons/day and Ghazipur to 3,300 tons/day. Overall, Delhi plans to burn about 13,300 tons of garbage per day by 2027 in its four incinerators. Apart from this, there are plans to build new WTE incinerators in Bhandwari, Ghaziabad, Sonepat, Ambala etc in the NCR region. Does every city in the Delhi-NCR region need a WTE incineration plant? The waste characterization study commissioned by the CPCB has found that high calorific plastic waste only forms 10.10 per cent of the city’s waste. So what are these WTE incineration plants actually burning? What

goes around a WTE incineration as waste, comes back around as diseases in our bodies decreasing the life expectancy and also the life quality in Delhi.

Our demands-

1. Bring WTE incineration under the GRAP protocol and suspend its operation when the AQI touches 201 and reaches the “poor category” range.
2. Stop the further expansion of WTE incineration projects in the Delhi-NCR region because of the above-mentioned reasons and move towards sustainable waste management practices.
3. Conduct a comprehensive study on the impacts of WTE incineration on Delhi’s air quality and human health and make them publicly available.
4. Focus on systemic transformations in the waste management sector which are less expensive yet more effective than WTE incineration, including restricting the production of non-essential plastics, lower consumption, source segregation, and decentralized waste processing.

Endorsed by :

1. Wastpickers Welfare foundation
2. International Accountability Project
3. Warrior Moms
4. Govandi Citizens Welfare Forum
5. Tani Alex
6. Aslan
7. Neha Jain
8. George Alexander
9. Smita Purushottam
10. Charles samuel
11. Bharti Ali
12. Association for Social Justice and Research
13. Bhavna sharma
14. Sharon
15. MC Yadav
16. Shona Chatterji
17. Farha Naaz
18. Youth for Justice
19. Centre for Chronic Disease Control
20. Basti Suraksha Manch- BSM
21. NAPM - SHRAM (Urban Forum)
22. ‘Why Waste Your Waste’ a citizens
23. Ranjit Devraj
24. Prateek Suri

25. Kamal kumar
26. ANIL MAHENDRA
27. Rajiv Malhotra
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88. Bharti
89. Centre for Financial Accountability
90. Green Army International
91. Financial Accountability Network
92. Green Communities Foundation
93. Ambily
94. Sarah Mallick
95. Ravleen Kaur
96. Lovely
97. Anita Iyer
98. TVVM SUMAN
99. Kanwal Pal Singh
100. Sonia Bagga
101. Delhi forum
102. DASAM
103. All India Central Council of Trade Unions (AICCTU)
104. Ashok choudhary
105. Asmi Sharma
106. Anjali
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