INCINERATION

Rationale

The issue of incineration, in the context of managing waste and recycling, has been raised in conversations with the NRC on various occasions. Incineration also came to the fore in the numerous discussions leading up to and following the NRC board adopting its updated definition of Recycling in 2014. For this policy, the term "incineration" is meant to include all forms of thermal combustion.

NRC's Definition of Recycling

It has been argued that incineration is a highly technical and necessary method of waste management, requiring the most technologically advanced equipment and processes to ensure the safety of people and the environment. However, in its most basic form--how those of us in the industry as well as the general public would view it--it is not that difficult to identify incineration as the burning of resources. It should be even easier for the NRC to codify incineration as a process that is contrary to NRC's definition and policy position on recycling. ***"Recycling** is a series of activities by which material that has reached the end of its current use is processed into material utilized in the production of new products."* NRC's policy position further excludes from its definition of recycling materials used as a fuel substitute and those used for energy production.

NRC Policy

- The NRC has adopted forty policies to date, most of which have at their core the support of activities that contribute to, and increase, recycling. NRC Policy Document, Hierarchy of Waste Management Preferences, states, *"The National Recycling Coalition endorses and supports a hierarchy of waste management preferences that gives first priority to source reduction, reuse, recycling, and composting to minimize the amount of waste to be otherwise managed."* It further states, *"The hierarchy should place primary emphasis on implementing all feasible source reduction, recycling and composting while not precluding communities from considering transformation facilities and landfills to address waste which cannot be reduced at the source, recycled or composted."*

NRC's Guiding Principles

- Some may advance the idea that because energy recovery is included in the Lifecycle Perspective of Sustainable Materials Management (SMM) that it is an essential element of waste management. Whether or not that is factual or what additional conditions must be applied to make that a factual statement is not germane to this policy discussion as incineration is excluded from the definitions of reuse and recycling. What is a fact is that NRC supports recycling and clearly states in its Guiding Principles: *"Thermal combustion is not recycling"*; *"Recycling is resource management, not waste management"*; and, *"Sustainable Materials Management is a critical strategic shift away from the past strategy of waste management toward a holistic resource management system that strives to use less materials overall, reduce toxins, recover more used materials, create new jobs, and foster economic development."*

- In its review of NRC's policies and other position statements, the Policy Committee found a variety of statements that placed incineration in a hierarchy of sorts, but none explicitly stated NRC support or non-support of incineration. Inasmuch as the topic of incineration continues to arise when discussing NRC's Definition of Recycling, the hierarchy of waste management, and SMM, and NRC has been asked to respond from a policy perspective, the Policy Committee proposes the NRC adopt the following policy statement—which is consistent with NRC's policies and Guiding Principles-- as a means of codifying its position on incineration and allowing clear and timely responses to inquiries on the topic:

Policy

"The NRC supports reuse and recycling as the most preferred methods of Sustainable Materials Management (SMM). While incineration may sometimes be included as an end-of-life management method in a material's lifecycle, it does not fit the definitions of reuse or recycling and, therefore, the NRC does not consider it as such."

January 15, 2016

Cross-reference: