

ISDE PADOVA

[consegnato da Patrizia Corra il 29 novembre 2021]

Dear Mr. Marcos Orellana,

We, a group of concerned citizens who live in Padua and are against the construction of a fourth incinerator line in Padua, believe that in your role as United Nations Special Rapporteur on Toxic and Human Rights, visiting Italy from 30 november to 13 december 2021, could help us in our fight. We as the International Society of Doctors for the Environment (ISDE) together with other citizens, associations and local committees are strongly against the authorization process of the new incinerator, requested by the Hestambiente-Hera group company.

The incineration plant which is already present in Padua has been in activity since the early 1960s. It currently consists of three lines and is located in an urban area, very close to houses.

The fourth line is supposed to replace the existing lines 1 and 2, but does not just represent an updating of the incinerator plant, but rather an expansion of the plant, which would need a significant increase in the amount of waste that needs to be burnt.

The annual increase would be around 40%, **increasing the release into the environment by at least 700 Kg/year of particulate matter, 14 tons/year of NOx, 100g/year of mercury, 140 g/year of IPA, 0,3 mg/year of dioxines.**

Already atmospheric pollution in Padua is a serious problem and an infringement procedure by the European Commission is active; in the Terranegra area, near the incinerator 87 overruns of the maximum concentration of PM₁₀ (50 µg/m³) were recorded in 2020 (over 35 allowed). In the same area the annual average of PM₁₀ was 37 µg/m³ and 28 µg/m³ for PM_{2,5} (the limit is 25).

Such values are the worst measured in the Padua area and also represent a condition of concern for the health of the inhabitants, as they are certainly causes of pathologies.

Under this critical state we believe it is necessary to reduce environmental threats rather than increasing pollution (for instance closing the old incinerator lines number 1 and 2).

The Hestambiente company also plans to burn biosolids from urban purification plants and waste leachate containing PFAS in new the fourth line.

It is well known that the thermal destruction of PFAS has not been proved, and it is possible that only an incomplete destruction may occur, forming other fluorine compounds (mostly not identified) that will be thus be released into the environment through the chimney.

The burning does not solve the PFAS problem, but following a perverse vicious circle, can redistribute these substances into the air and into the soil, with the additional risk of producing new materials which could be even more toxic for people and the environment.

For these reasons we have submitted to the Regional Authorities several observations against the fourth line of the incinerator (48 documents), with the agreement of citizen's associations active for the contrast to the PFAS pollution in the Almisano groundwater area (Mamme NO PFAS, PFAS Land) and in the Venice area (citizen's associations against the Fusina incinerator plant).

Additionally, we submitted to the Regional Commission for VIA (italian acronym for Environmental Evaluation Impact) the formal request to deny the authorization to build the fourth line of the incinerator, based on the precautionary principle.

We also developed an alternative scenario to the fourth line, that is a correct waste disposal that promotes the recovery of materials instead of the burning of waste to recover energy. This scenario agrees with the concept of circular economy.

If the city of Padua were to increase its differentiated waste collection from the present 59% to 82% (a reasonable target, which has already been attained in the city of Treviso, in the same Veneto Region as Padua) the amount of waste to feed the incinerator would be drastically reduced, and lines number 1 and 2 could be closed.

It is remarkable that an evident conflict of interest arises in the managing of the waste collection in Padua, because the AcegasApsAmga company that collects the waste belongs to the same Hera company that burns them at the incinerator.

The same criteria can be applied to the entire Veneto Region: the target of 87% of separate waste collection, instead of the current 70%, would decrease the amount of waste to be delivered to the incinerator, starving the fourth line, that would collect “special” waste or import waste from outside areas.

Today the authoritative iter of the fourth line is at its final step: in these days the Regional Commission for VIA discusses the point and the administrative Institution that must give or refuse the authorization (Service Conference) is called for the 6th December.

The documents we produced to oppose the authorization are available at your request.

International Society of Doctors for the Environment (ISDE) of Padova