

1st July 2013

Mr. Edison Alleyne
The Permanent Secretary
Ministry of the Environment & Drainage
1st Floor
SP Musson Building
Hincks Street
Bridgetown
St Michael

Dear Sir,

The Future Centre Trust is an environmental Non-Governmental Organisation (NGO) and registered charity providing environmental education to the public of Barbados. Our mission is “To stimulate awareness and encourage responsible management of the vital relationship between people and nature leading to a sustainable future for all”.

Our mandate therefore compels us to advocate for the sustainable development of our nation. The Future Centre Trust was founded following the creation of the Village of Hope for *The U.N. Global Conference on the Sustainable Development of Small Island Developing States* in Barbados in 1994. The resulting documents, the Barbados Programme of Action and the Barbados Sustainable Development Policy (BSDP, 2004) translate our commitment to Agenda 21 as a nation. Within the Barbados Sustainable Development Policy, it is detailed that public participation in sustainable development should be guided by *Proactivity, Inclusiveness, Shared Responsibility, Openness, Access and Transparency*. The BSDP states that “The full participation of all those interested in or affected by sustainable development issues is essential to achievement of durable solutions” (BSDP p.20, 2004).

We are aware of the proposal for the development of a Waste to Energy Facility at the Mangrove Pond Landfill in the coming months and have a number of concerns about this proposed initiative.

We have outlined our questions and concerns below:

- Based on Agenda 21 which was agreed upon by the worldwide community as the best framework for adopting sustainable development and the Barbados Sustainable Development Policy, we understand that it is incumbent upon the Government of Barbados to ensure that there is disclosure and transparency in all matters related to environmental decision making in our nation, and specifically on large scale facilities such as the proposed Waste To Energy facility. In this regard, has there been any public engagement on this matter? For example,

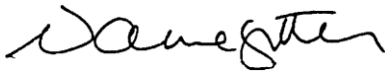
have there been town hall meetings held to adequately brief the public about this initiative, and to allow for public comment on its pros and cons?

- Have there been any Environmental/Social Impact Assessments completed for the proposed facility? If so could these assessments be made available to us and the general public?
- We are concerned about the state of Barbados' air quality and the impact which this facility would have on residents, in particular those from the surrounding St. Thomas area who currently carry the heaviest environmental burden in our society with the location of several waste facilities. How has the decision been made about where a Waste To Energy Facility should be located in order to have the least impact on the environment and society?
- Has the Government of Barbados found a model of a Small Island Developing State which has successfully implemented a Waste To Energy facility without updating its' existing pollution and solid waste management regulations and investing in the technology to respond to the associated risks? ?
- How does the Government of Barbados intend to ensure that Barbados does not exceed its ecological carrying capacity by increasing our generation of waste for this facility?
- Could you indicate what type of technology is being proposed for use in this initiative and the type of waste which will be used as feedstock? Will recyclable plastics and compostable waste be used as feedstock or is there a plan to separate this type of waste at origin?
- What standards and methods will be used by the Government of Barbados to monitor and regulate the nitrogen dioxide, mercury, dioxin, particulate matter, and acidic gas which are by-products of Waste to Energy facilities? What is the capacity of EPD and other relevant entities to manage both the pollution and risk of failed operations? We are concerned about the impacts of this facility to our air, water and soil quality. FCT is also concerned about the safety of staff working in this facility and residents of surrounding areas. What capture and treatment mechanisms will be required by the GOB for the fly-ash generated by the Waste To Energy facility?

- As an entity which avidly promotes the implementation of recycling we have seen great successes with our CoRe Network initiative which works with community groups to teach them the principles of recycling and aid them in the establishment and execution of a recycling centre for their community. We would be happy to share detailed information about the response and the results we have had to date. We are disappointed that the GOB has yet to implement an effective national recycling program nor have they identified recycling targets. Not only is recycling an environmentally responsible practice but it is also an economically progressive one. A legislated recycling policy with clearly defined targets and adequate funding could further stimulate the local economy. The recycling industry can create more jobs and multiple businesses opportunities which can lead Barbados to a clean, green and sustainable economy. The Canadian jurisdiction provides interesting models of related legislation and how to go about enforcement. Why was this Waste To Energy option proposed as opposed to the consideration of legislated recycling? What efforts has the GOB made to legislate recycling?

We do hope to receive a response in adequate time that we can contribute to the decision making related to this venture.

Sincerely
The Board of Directors
THE FUTURE CENTRE TRUST



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Vivian Anne Gittens
Chairman of the Board of Directors
THE FUTURE CENTRE TRUST