

Date: 21 August, 2024

Re: Urging International Finance Corporation to Withdraw Proposed Financing for 4 Waste to Energy Incinerators in Gujarat, India

Dear World Bank Board of Directors,

Through this letter, the **undersigned 174 networks, civil society organisations, activists, and communities** strongly urge the World Bank's Board of Directors to reject the [proposed \\$40 million loan for Abellon Equity](#) (Project no. 46819) that seeks to construct and expand four (4) Waste-to-Energy (WTE) incinerators in Ahmedabad, Jamnagar, Rajkot and Vadodara in the state of Gujarat in India. We reiterate the concerns of impacted communities and violations by the project as expressed in the [letter](#) sent to you on 26th June 2024 for which we are eager to receive your response.¹

About Waste-to-Energy (WTE) incinerators

Waste-to-energy incinerators (WTE) burn garbage in a furnace to produce steam which would power a turbine to produce electricity. From the perspective of the people and the planet, WTE incinerators have only weaknesses and threats. It pollutes air, soil, and water through the release of emissions and leachate, causes major health problems in surrounding communities, places financial burdens on local and central governments, generates the most expensive form of electricity, generates hazardous ash as a residue, undermines waste prevention, reuse, and recycling and excludes local economies of recycling and waste management.

Materials in garbage such as paper, plastic, and glass that are derived from finite natural resources and could otherwise be recycled and composted are often burnt in WTE incinerators. Adding to that, the municipal solid waste found in India has very high moisture content and low calorific value due to which these incinerators can only generate small amounts of energy.

¹ The concerns and demands of the local communities were also shared directly with representatives of the US Treasury on July 16th, 2024.

In India, WTE incinerators produce the most expensive form of electricity at about 7 rupees per unit. WTE incinerators directly contribute to climate change as they are heavily reliant on burning plastic which makes them as harmful as any fossil-powered energy generation system. Incinerating [plastic which is 99 percent made of fossil fuels](#) emits 2.7 tonnes of CO₂e for every tonne of plastic burned .² [WTE incinerators are thus a false waste and climate solution.](#)

Experiences from across the globe and India

In the U.S. and the E.U., WTE incineration is considered among the dirtiest sources of energy and the most emissions-intensive form of power generation on the grid. The US Environmental Protection Agency states that “incinerators emit more carbon dioxide per megawatt-hour than coal-fired, natural-gas-fired, or oil-fired power plants”.³ A recent scientific paper further proves that incinerators emit more greenhouse gas emissions per unit of electricity produced than any other power source.⁴ In the US, between 2000 and 2004, 51 trash incinerators were shut down and no new incinerators have been built in the US since 1995. The EU is moving away from this toxic technology by scrapping funding for these plants.⁵

These incinerators have also not had a great track record in India. A [report by the Centre for Financial Accountability](#) which analyzed 20 waste-to-energy plants across 12 states in India, revealed how despite strong policy and financial support, WTE incinerators in India have failed. The horizontal analysis of top waste-to-energy companies in India done in this report, including Abellon Clean Energy Limited, shows that each company's current assets have decreased from 2019 to 2023. Lack of availability of high calorific value segregated waste on one side, and high operations and maintenance costs on the other, have been responsible for the failure of several WTE incinerators in the country.

² Material Economics. 2018. "[The Circular Economy - a Powerful Force for Climate Mitigation](#)"

³ U.S. EPA. 2006. "[Solid Waste Management and Greenhouse Gases. A Life-Cycle Assessment of Emissions and Sinks 3rd edition](#)"

⁴ Global Alliance for Incinerator Alternatives. 2021. "[Waste Incinerators Undermine Clean Energy Goals](#)"

⁵ Energy Justice. [Fact Sheet: Trash Incinerator Closures 2000-2024](#)

Despite these studies and the continuous banning of WTE projects in the US and EU, IFC is engaging in environmental racism by promoting these harmful WTE incinerators in the Global South, and in countries like India where these incinerators are contributing to climate pollution and directly harming marginalised communities.

Violations of the 4 WTE incinerator plants by Abellon Clean Energy Limited in Gujarat, India

Abellon Clean Energy Limited (ACEL) is a Waste to Energy (WTE) developer based out of Gujarat in India, which is developing 4 WTE plants in Rajkot, Vadodara, Ahmedabad, and Jamnagar of cumulative capacity of 52.20 MW as of 2023. Of these four projects, the plant in Jamnagar with a capacity to produce 7.5 MW of power is operational and the project seeks to expand this by building another incinerator of 7.5 MW in the same facility. The harmful impacts of WTE incinerators have been documented in the subproject in Jamnagar where the incinerator has been operational since November 2021. Jamnagar is a town in coastal Gujarat where there have been [multiple complaints of industrial pollution](#) and adding to this, the incinerator plant here has been built right behind a dense residential locality in the urban village of Navagam where around 1000 families are residing. Ever since the operation of the plant, they have faced issues of noise pollution, air pollution, deposition of effluent smog on their residences, water pollution, severe health impacts, etc. The local communities have filed complaints against the operation of the plant to the Gujarat Pollution Control Board who have given them a [show cause notice](#). The recent disclosure by the IFC about the proposed investment in Abellon Clean Energy Limited (ACEL)/ Goodwatts Jamnagar WTE private limited has thus alarmed the communities and raised the fear of further aggravation of their problems from companies' operations.

Due to the violations seen in Jamnagar, civil society organisations and activists in Ahmedabad, Vadodara, and Rajkot are worried about the environmental and health impacts on communities staying in the vicinity of the proposed WTE incinerators, if these are constructed. The incinerator in Ahmedabad which has only been partially built is being constructed in Gyaspur village, on the outskirts of the city, where there is already another incinerator by Jindal Power operating nearby and there are many other polluting

industries. Due to the pollution generated by the existing incinerators and other industries, communities residing here have already been suffering from severe health impacts with many reported cases of cancer. Construction of another WTE incinerator in such an area will bear cumulative health and environmental impacts.



Residents from Navagam village impacted by the WTE incinerator plant in Jamnagar protesting at the District Collector's office against the pollution from the plant in 2021.

Waste worker unions in Gujarat are also concerned about the economic displacement of informal waste pickers and recyclers as WTE incinerators directly impact their livelihood. In the informal sector, the main recyclable materials handled and commercialized are plastics, metals, glass, paper, cardboard, and, to a certain degree, textiles. This means that if this waste that otherwise would have been recovered and commercialized by the informal waste sector is diverted directly to the incineration facility, the informal waste workers would not have access to these materials and would lose their access to income.⁶ A meta-analysis of 36 studies spanning 16 countries found that sustainable waste management strategies create over 200 times as many jobs as incinerators from repair,

⁶ Women in Informal Employment, Globalizing and Organizing. 2019. "WIEGO Technical Brief no. 11- ["Waste Incineration and Informal Livelihoods: A Technical Guide on Waste-to- Energy Initiatives"](#)

recycling, and remanufacturing sectors involving the waste pickers, aggregators, and recyclers.⁷

A careful examination of the Environmental and Social Impact Assessment (ESIA) reports submitted for this project has revealed glaring flaws in the assessment. This indicates a breach of several IFC Performance Standards, which are mandatory requirements of the client while taking a loan from IFC. Furthermore, to circumvent the Government of India's (GOI's) environmental norms, the project proponents have deliberately chosen to keep the WTE project size at 14.9 MW instead of 15 MW, to escape Environmental Clearance (EC) mandated by the Environment Impact Assessment (EIA) rules 2006. Waste-to-energy incinerators are categorized as a "red category" industry by the Central Pollution Control Board of India due to heavy pollution of air, water, and soil. Yet these projects have been wrongly categorised with a risk rating of 'B' by IFC and failed to undertake rigorous due diligence work by ignoring the irreversible, cumulative, and existing complaints filed by local communities against the Jamnagar plant.

Key Demands

We hope that based on the evidence provided on the violations of IFC's Performance Standards, social and environmental harms of the project, the documented potential adverse health impacts of the project on the local communities, livelihood impacts on waste workers, and the flawed Environmental and Social Impact Assessment (ESIA), the IFC will not proceed with the investment to Abellon Clean Energy Limited.

We therefore strongly urge you as Directors of the World Bank to consider the scientific and public evidence presented above, to respect human rights, and to be true to the Bank's commitment to achieve the SDGs and the Paris Climate Agreement goals, by not only voting against the loan to Abellon Clean Energy Limited, but to halt all finance to waste-to-energy incinerator projects.

⁷ Global Alliance For Incinerator Alternatives. "[Zero Waste and Economic Recovery: Job Creation Potential of Zero Waste Solutions](#)"

Written by:



#BreakFreeFromPlastic

Endorsed by:

1. Samast Machimar Samaj, Gujarat, India
2. Vadodaraa Jan Samiti, Gujarat, India
3. Peoples Union of Civil Liberties-PUCL, Gujarat
4. Maldhari Vikas Sanghatan, Gujarat, India
5. SEVA, Gujarat, India
6. Paryavaran Suraksha Samiti, Gujarat, India
7. Rahethan Adhikar Manch - Gujarat-Ahmedabad, India
8. KKPKP, Pune, Maharashtra, India
9. SWaCH Cooperative, Maharashtra, India
10. Govandi New Sangam Welfare Society, Maharashtra, India
11. Bargi Bandh Visthapit Evam Parbhavit Sangh, Madhya Pradesh, India
12. Poovalugin Nanbargal, Tamil Nadu, India

13. Plachimada Solidarity Organisation, Trivandrum, India
14. Ecotourism & Conservation Society of Sikkim, India
15. Affected Citizens of Teesta, Sikkim, India
16. Zero Waste Himalaya, India
17. Lok Shakti Abhiyan, Odisha, India
18. Information Resource Centre For Urban Deprived Communities, Tamil Nadu, India
19. Maharashtra State Bank Employees Federation
20. Delhi Forum, India
21. National Alliance for People's Movements, India
22. MAUSAM- Movement for Advancing Understanding of Sustainability And Mutuality, India
23. SANDRP, India
24. Toxics Watch, India
25. Focus on the Global South, India
26. Waste to Biogas to Energy Startup Innovation Network, India
27. Eco Circular India Foundation, India
28. Sambhaavnaa Institute
29. Youth for Climate, India
30. Mines,minerals and People, India
31. Nadi Ghati Morcha, India
32. All India Kabadi Mazdoor Mahasangh, India
33. Joint Action for Water, India
34. Waste Warriors, India
35. Warrior Moms, India
36. We the Change Trust, India
37. Warrior Moms, India
38. Indigenous Perspectives, India
39. Ajeevika Bureau, India
40. Samata, India
41. South Asian Solidarity Collective, India
42. Friends of the Earth, India

43. Centre For Labour Research and Action, India
44. National Land Coalition - International Land Coalition
45. Indian Social Action Forum
46. Green Army International, India
47. Anhad, India
48. Stree Mukti Sanghatan, India
49. Coastal Women's Movement, India
50. International Campaign for Justice in Bhopal, India
51. MCC, India
52. Grambangla Unnayan Committee, Bangladesh
53. Participatory Research & Action Network - PRAAN, Bangladesh
54. Alternative Law Collective, Pakistan
55. Lahore Conservation Society, Pakistan
56. Pak Trading, Pakistan
57. Pakistan Fisherfolk Form, Pakistan
58. EcoCare Consultancy Services (ECCS) Private Limited
59. Clean Up Nepal, Nepal
60. Health Environment and Climate Action Foundation (HECAF360), Nepal
61. Samyukta Safai Jagaran, Nepal
62. Community Empowerment and Social Justice, Nepal
63. Indigenous Women's Legal Awareness Group, Nepal
64. Health Environment and Climate Action Foundation, Nepal
65. Centre for Environment Justice, Pakistan
66. Movement for Land and Agricultural Reform (MONLAR), Sri Lanka
67. FIAN Sri Lanka, Sri Lanka
68. Sri Lanka Nature Group - SLNG, Sri Lanka
69. National Fisheries Solidarity Movement, Sri Lanka
70. Thant, Myanmar
71. Alyansa Tigil Mina, Philippines
72. EcoWaste Coalition, Philippines
73. War on Waste Negros Oriental, Philippines

74. Sahabat Alam Malaysia (Friends of the Earth), Malaysia
75. Consumers' Association of Penang, Malaysia
76. Trend Asia, Indonesia
77. Indonesia for Global Justice (IGJ), Indonesia
78. The Indonesian Forum for Environment (WALHI), Indonesia
79. TKPT, Indonesia
80. Bai Waste Platform, Indonesia
81. Ecoton, Indonesia
82. Brantas River Waterkeeper, Indonesia
83. NOWASTE SURABAYA, Indonesia
84. Inisiasi Masyarakat Adat (IMA), Indonesia
85. KSPPM, Indonesia
86. AMAN Maluku, Indonesia
87. Yayasan Srikandi Lestari, Indonesia
88. SERUNI, Indonesia
89. Pacific Environment Vietnam, Vietnam
90. SCODE, Vietnam
91. Equitable Cambodia, Cambodia
92. Oyu Tolgoi Watch, Mongolia
93. Terra Pheonix, Singapore
94. Greeners Action, Hong Kong
95. Blue Dailan, China
96. Korea Zero Waste Movement Network, Korea
97. Uzbek Forum for Human Rights, Uzbekistan
98. ACARO, Uzbekistan
99. PA "Bir Duino Kyrgyzstan ", Kyrgystan
100. FORUM- Asia, Asia (Regional)
101. NGO Forum on ADB, Asia (Regional)
102. Reality of Aid-Asia Pacific, Asia (Regional)
103. Asian Peoples Movement on Debt and Development, Asia (Regional)
104. 350 Asia, Asia (Regional)

105. Asia Pacific Network of Environmental Defenders, Asia (Regional)
106. Sankalp Gramotthan Bahuddeshiya Sanstha, Asia (Regional)
107. Armenian Women for Health and Healthy Environment (AWHHE), Armenia
108. Friends of the Earth Spain, Spain
109. Friends of the Earth England, Wales and Northern Ireland, United Kingdom
110. Polish Zero Waste Association, Poland
111. The Bretton Woods Project, United Kingdom (Global)
112. Recourse, Netherlands (Global)
113. Urgewald, Germany (Global)
114. Environment and Language Education Trust, South Africa
115. Mapela Executive Committee, South Africa
116. JUHUDI Community Support Center, Kenya
117. Jamaa Resource Initiatives, Kenya
118. Endorois Welfare Council (EWC), Kenya
119. Green Advocates International (Liberia)
120. Sustainable Development Institute (SDI), Liberia
121. Center for Environment/Friends of the Earth Bosnia and Herzegovina, Bosnia and Herzegovina
122. Les Amis de la Terre-Togo, Togo
123. Care For Environment, Cameroon, Africa
124. Host Communities Network of Nigeria (HoCoN), Nigeria
125. Buliisa Initiative for Rural Development Organisation, Uganda
126. National Association of professional Environmentalists (NAPE), Uganda
127. Zimbabwe People's Land Rights Movement, Zimbabwe
128. Dibeem For Environmental development, Jordan
129. Consejo Indígena Maya Ch'orti de Olopa Chiquimula, Guatemala
130. ANAF AE, Honduras
131. AMFER, El Salvador
132. CAMBIUM, Colombia
133. Otros Mundos Chapas/Amigos de la Tierra México, Mexico
134. Center for International Environmental Law, United States (Global)

135. Trash Hero World, Global
136. Saahas, India
137. Chennai Climate Action Group(CCAG), India
138. Vinod Sonera, India
139. Ramachandra Rao, India
140. Namuna Amjad, India
141. Priya Jain, India
142. Rosamma Thomas, India
143. Priyanka Raj, India
144. Avinash Kumar India
145. Ayesha Khan, India
146. Swati Desai, India
147. Rohini Malur, India
148. Ramnarayan, India
149. Bhavna Sharma, India
150. Ambily Adithyan, India
151. K Saravanan, India
152. Selvakumar, India
153. Dhilipan K, India
154. Ashok, Tamil Nadu, India
155. Jamunarai, India
156. Salma Sumi, India
157. Kobad Ghandy, India
158. Renuka Kad, India
159. John, India
160. Hirak Bandyopadhyay, India
161. Nikhilkumar Panchal, India
162. Prashanth, India
163. Dr. Sultan Mahmood, Pakistan
164. David Jens Thomas Pedersen, Canada
165. Jenny

166. Sundarrajan
167. Prabhakaran Veeraarasu
168. SARAVANAN T M
169. Anu
170. Yukendran
171. Kamaraj
172. Bharat
173. Balaji S
174. SABARESAN