

## **Recommendations of the Central Environmental Authority on respective Strategic Environmental Assessment and the proposed master plan for Solid Waste Management for Western province, Sri Lanka**

### **A.) Findings & concerns**

1. A Strategic Environmental Assessment (SEA) is a systematic process for evaluating the environmental implications of a proposed policy, plan or programme and provides means for looking at cumulative effects and appropriately address them at the earliest stage of decision - making alongside economic and social considerations (European Union, 2022).

However, this SEA of proposed Master plan does not evaluate the master plan from the national point of view, but justifies it. Therefore, the SEA does not meet the expectations of conducting a SEA for the proposed Master plan.

2. The strategic environmental assessment has been limited to an environmental impact assessment of the option proposed by the master plan. The SEA does not analyze alternatives, existing waste management projects and national priorities which needs to be a major component of it.
3. National Environmental Policy approved by the Cabinet of Ministers in June 2022 has recognized 3R concept which refers to reduce, reuse and recycle and circular economy which is a way of relocating the waste from end of the supply chain to the beginning, as key policy principles. Accordingly the proposed master plan does not align with the National Environmental Policy.
4. National Policy on Waste Management approved by the Cabinet of Ministers in October 2019 highlights the need to ensure effective resource circulation throughout the country. Some of its objectives are;
  - 4.1. To make every effort to minimize final disposal of waste by retaining its resource utilization value throughout the life cycle.
  - 4.2. To enhance effectiveness and efficiencies of existing waste management systems/practices and promote new systems for avoidance, prevention and/or minimization of waste with appropriate technology and practices.
  - 4.3. To reduce risks to public health, environment, and ecosystems and improve occupational health & safety of waste handlers.
5. ‘Existing internationally and nationally accepted appropriate waste management concepts such as 3R principle and its extensions shall be practiced with special emphasis on waste prevention/avoidance approaches that would require ‘RE-Think’ as the basic prerequisite for conducive and accountable social transformation’ -Guiding Principle no. 05 of National Policy on Waste Management
6. Application of market based instruments including ‘Polluter pays principle’ and ‘Extended producer responsibility’ throughout the life cycle of products, production, and provision of services will be recognized as effective waste management tools maximizing resource and economic efficiency. Guiding Principle no. 07 of National Policy on Waste Management

The CEA is in the process of amending the national legislation of the country to implement the concept of extended producer responsibility.

7. Accordingly, the proposed master plan contradicts national waste management policy.
8. Proposed master plan does not comply with the policy and sub policies of the Western provincial Waste Management Authority.
9. The master plan does not include a situation analysis or a SWOT analysis or PESTLE analysis, which was to be conducted at the beginning of planning.
10. Master plan has been developed almost focusing on the technique of waste to energy conversion. Very few options have been mentioned, however these options have not been assessed before selecting Thermal Recovery Facility as the best option.
11. There are some issues associated with environmental friendly disposal of fly ash and bottom ash generated by existing waste to energy power plants in Sri Lanka.
12. Availability of many Thermal Recovery Facilities may discourage local authorities, households and other waste generators from engaging in waste reduction, separation and value addition since mixed waste and non-degradable waste can be sent directly to the facility, which eliminates waste separation and other environmental friendly waste management steps.

#### **B.) Recommendations**

1. Strategic Environmental Assessment of the draft Master plan should fulfill the requirements of conducting a SEA as stated in A) 1 and 2 under above-mentioned findings and concerns.
2. Proposed master plan needs to be adjusted to satisfy the requirements specified in the national environmental policy and the national waste management policy
3. Proposed master plan should comply with the policies of Western provincial waste management authority. (Concept of Eco cities in Japan can be considered as an example)
4. Include an executive summary in the master plan.
5. Master plan requires an analysis which evaluates solid waste management practices conducted in the past within the Western province or entire country.
6. Master plan requires a situation analysis or a SWOT analysis or PESTLE analysis.
7. All available technologies for solid waste management in the region have to identified, validated and summarized in the master plan before selecting the best option. A clear justification for the selection of the best option and the methodology of developing the master plan are required to be mentioned in the plan.