

Board of Directors**Asian Development Bank**

6 ADB Avenue, Mandaluyong City 1550, Metro Manila
Philippines

Dear ADB Board of Directors,

We write to raise serious concerns about the inclusion of Waste-to-Energy incineration and other waste-burning technologies in the Asian Development Bank's Energy Policy Review and related strategies. If ADB is to remain credible in its commitment to decarbonization, circular economy principles, and the Paris Agreement, it must phase out WTE incineration, thermal investments, and all forms of waste-burning, including co-firing of Refuse-Derived Fuel (RDF) and biomass.

WTE is fundamentally incompatible with climate and environmental goals. These technologies produce high levels of greenhouse gas emissions, release toxic ash and hazardous pollutants, and undermine air quality and public health. As shown in projects such as Can Tho in Vietnam and Canvest in China, WTE plants rely heavily on fossil-based feedstocks such as plastics and rubber, making them fossil-intensive rather than renewable.

Far from supporting a circular economy, WTE locks countries into linear consumption and waste models. As UNEP's Global Waste Management Report 2024 makes clear, combusted materials can never be recovered or reused. WTE reduces incentives for waste reduction, segregation, and recycling, directly contradicting ADB's stated waste management hierarchy. Indeed, the European Union has already removed WTE from its circular economy roadmap, recognizing it as a barrier to true circularity.

Global policy shifts, including plastic bans, plastic reduction measures, improved recycling, and the forthcoming Global Plastics Treaty, are reducing the very feedstocks on which WTE depends. In China, evaluations of ADB-supported projects such as Shanghai SUS show that new recycling and minimization policies have already led to WTE plant shutdowns due to a lack of feedstock. Persisting with WTE investments exposes ADB to high risks of stranded assets, while communities bear the costs of pollution and health harms.

WTE is also out of step with ADB's new safeguards policy, which bans the production of persistent organic pollutants and calls for reducing material use intensity. Research on the Can Tho WTE Plant in Vietnam has confirmed emissions of dioxins and other hazardous pollutants—clear violations of these safeguards.

Finally, WTE is not only environmentally harmful but also economically unsound. Multiple studies show that it is significantly more expensive than both coal and genuinely renewable sources like wind and solar, making it an inefficient and risky use of resources.

We therefore urge the ADB Board of Directors to:

- Amend the Energy Policy to prohibit all support for WTE incineration, thermal energy from waste, and waste co-firing in coal and gas plants.
- Redirect financing toward sustainable, community-centered renewable energy solutions such as wind, solar, and decentralized clean energy systems.
- Ensure alignment with circular economy principles, prioritizing waste reduction, reuse, and recycling above all waste-burning technologies.
- Strengthen compliance with ADB safeguards, ensuring that no projects expose communities to hazardous pollutants like dioxins or undermine waste reduction targets.

The Energy Policy Review is a critical opportunity in moving away from harmful, high-risk, and outdated technologies.

We urge you to commit to a truly sustainable, zero-waste, and low-carbon energy future that puts the health of people and the planet first.

You can also access our collective submission [here](#).

Thank you very much and we look forward to your commitment.

Sincerely,

Organization

Country