

## Request to make a deputation to

### Camden Council's Culture and Environment Scrutiny Committee on 16 November 2020

Submitted to Sola Odusina at [sola.odusina@camden.gov.uk](mailto:sola.odusina@camden.gov.uk) on 12 November 2020

## Summary

As a constituent member of the North London Waste Authority (NLWA), Camden Council is supporting the construction of a new energy-from-waste (EfW) incinerator in Edmonton. The NLWA has selected three foreign-based companies for participation in the tender process and will be making the final contract decision in the first half of 2022, after which contract execution will begin. Despite a steady decline in waste arisings and inadequate recycling rates throughout North London, the plant will be 30% larger than the current Edmonton incinerator, which is nearing the end of its operational life and will need to be decommissioned in 2027.

There is a rapidly narrowing window of opportunity for Camden Council to pause and review its support for the project and to consider alternatives that are in line with its climate commitments. In that context, and in view of the attached information, **Climate Emergency Camden and Extinction Rebellion (XR) Camden respectfully ask the Culture and Environment Scrutiny Committee to investigate:**

- 1) whether building a new EfW incinerator during a climate emergency is compatible with Camden Council's **climate obligations**—such as those outlined in the Climate Action Plan, under the mandate of the Renewal Commission, and in the revised Constitution—and the Tyndall Centre's carbon budgets for Camden, which are based on the 'well below 2°C and pursuing 1.5°C' global temperature target and equity principles stipulated in the Paris Agreement (see <https://carbonbudget.manchester.ac.uk/reports/E09000007/print/>);
- 2) whether the **business case** for the new plant still holds, particularly in view of:
  - extended producer responsibility requirements that are included in the Environment Bill, which will shift the financial burden from local authorities to producers (see <https://www.circularonline.co.uk/news/government-to-fully-fund-all-new-environment-bill-burdens-on-councils/>; <https://www.letsrecycle.com/news/latest-news/producers-to-pay-full-costs-bill-confirms/>; <https://resource.co/article/government-could-push-ahead-free-garden-waste-collections-says-eustice/>);
  - financial risks associated with EfW incineration overcapacity (see [xrzerowaste.uk](http://xrzerowaste.uk)); and
  - UKWIN's recommendations for a value for money review of the planned Edmonton incinerator (see <https://ukwin.org.uk/vfm/>).
- 3) what steps Camden Council could take to identify and implement a **more sustainable and more appropriate approach** to waste and resource management before the current Edmonton incinerator is decommissioned, perhaps inspired by plans developed in Bristol or elsewhere (documentation available on request).

These suggestions are aimed at ensuring that Council decision-makers take on a more active role in lowering greenhouse gas emissions and curbing the loss of biodiversity, while also mitigating and minimizing risks related to climate and ecological breakdown.

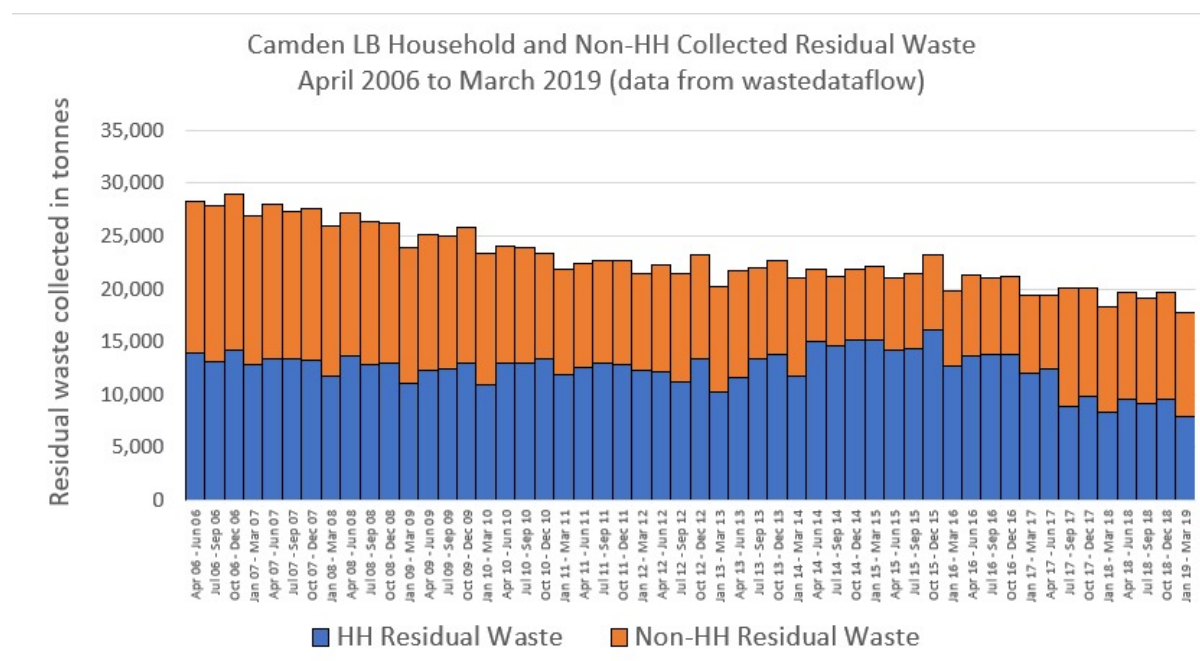
We thank you for considering this matter and look forward to working with you to help identify an appropriate waste and resource management solution for Camden and its residents.

## Persons who wish to address the Committee

Tania Inowlocki  
Dr Rembrandt Koppelaar

# Information for consideration by the Culture and Environment Scrutiny Committee regarding the North London Heat and Power Project (NLHPP)

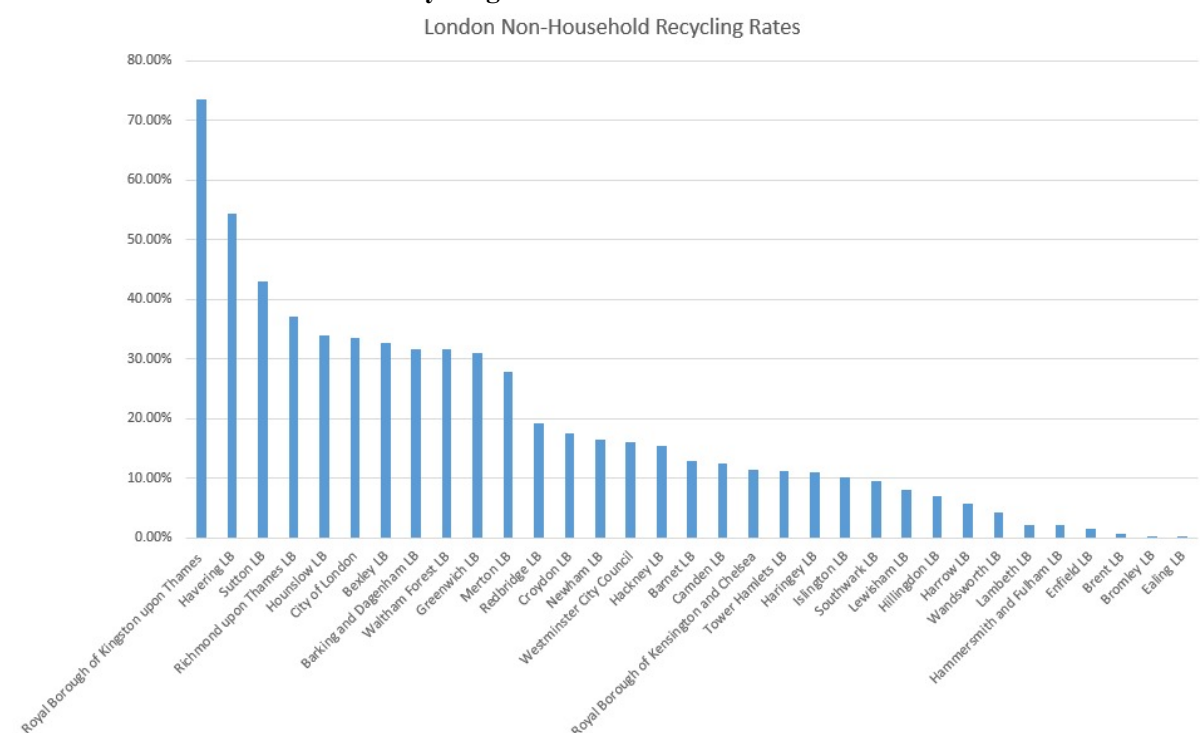
## Residual\* waste arisings in the Borough of Camden, April 2006–March 2019



**Note:** \* According to Veolia, about 85% of Camden's 'residual' waste is actually recyclable. ('Around 85% of an average bin in Camden can be recycled.' See <https://www.veolia.co.uk/london/camden>.)

**Data source:** WasteDataFlow (<https://www.wastedataflow.org/>)

## London non-household waste recycling



**Data source:** DEFRA (<https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results>)

- **Overcapacity.** In view of the London Plan’s 65% recycling target for 2030, the planned incinerator is three times too large for North London’s needs. It will be 30% larger than the current incinerator although **waste generation has been falling since 2015** (counter to the NLWA’s projections that formed the basis of its DCO application to BEIS; see Figure 2.2 on page 7 of the [North London Joint Waste Strategy Annual Monitoring Report 2018-19](#)) and although up to 85% of the waste that is currently incinerated could be recycled (for Camden, see <https://www.veolia.co.uk/london/camden>; other sources available on request). Waste will need to be shipped into North London from farther afield to ensure the facility operates at capacity, which will contribute to CO<sub>2</sub> emissions and congestion. We have not been able to find any records showing that the NLWA’s public consultation informed residents that waste would be imported from outside North London. How is Camden Council justifying its support for such overcapacity? Has a more appropriately sized, scaled-down version of the incinerator ever been considered? Have alternatives to incineration been considered in view of technological advances since the DCO application was submitted in 2015?
- **Overcharging of taxpayers.** The figures for local authority-collected waste (LACW) that were used in the DCO application are too high and their use in the draft North London Waste Plan was not supported by the inspector at the examination in public in November 2019 (the waste forecasts were about 40% above apportionment). Council taxpayers are thus being charged to build an EfW facility that is too big for the LACW data from the councils. How does that affect Camden Council’s duty to taxpayers and does it warrant a report in the public interest?
- **Failure to meet municipal and national recycling targets.** North London’s recycling rate has decreased from 33% to 30% since 2015, missing the targets of 45% by 2015 and 50% by 2020 by a wide margin (although six London boroughs are above or close to the 50% target for 2020, indicating that the targets can be reached). Since 55%–85% of what the NLWA calls ‘residual waste’ could actually be recycled or composted ([Veolia says that ‘around 85%’ of Camden’s ‘residual waste’ is actually recyclable](#)), the NLWA currently burns at least 320,000 tonnes of recyclable and compostable waste every year. The NLWA recently wrote: ‘If businesses achieve 75 per cent recycling rates, it will lead to 65 per cent recycling across London. The NLHPP is modelled on this basis.’ Is the NLWA placing the onus on businesses instead of attempting to promote recycling among households? Is such a strategy at odds with the NLWA’s statutory duty to have regard to the strategies of the GLA, and specifically with the new London Plan, para. 9.8.13: ‘Examples of the “demonstrable steps” required under Part D3 of Policy SI8 Waste capacity and net waste self-sufficiency are: **a commitment to source truly residual waste** – waste with as little recyclable material as possible’? It is also worth noting that the new London Plan (Policy SI7 on reducing waste and supporting the circular economy) calls on waste planning authorities to help ‘ensure that there is **zero biodegradable or recyclable waste to landfill by 2026**’.
- **Incompatibility with the goals of Camden’s Economic Renewal Commission.** Two issues are of particular concern in this context:
  - **Promotion of a green and sustainable economy.** Is Camden Council’s decision to go ahead with a project that will cost North London taxpayers £1.2 billion—money that could be spent to boost recycling, reduce waste, create green jobs, and place North London on a path to reach the Mayor’s carbon neutrality target by 2030—truly ‘in line with the Council’s commitments to tackling the climate emergency and with an explicit focus on supporting a green and sustainable economy as an engine of local opportunity and growth’, as outlined in the report of Camden Council’s Leader entitled ‘Camden’s Economic Renewal Commission (CS/2020/18)’? Can the Commission remain silent on the NLHPP and still ‘have reference to the recommendations and actions outlined in the Camden Climate Action Plan’ (same source)?

- **Social justice and health equity.** The incinerator is to be built in Edmonton, which is among the country's most deprived wards. The residents of Edmonton have significantly worse health than the average UK resident, including with reference to asthma and Covid-19. Enfield also has a higher percentage of black residents than London (and the UK) overall, meaning that the precautionary principle and the equity principle should apply with respect to building an incinerator in the area, especially in view of scientific studies linking proximity to incinerators to health risks. Camden Council's backing of the project—and the Renewal Commission's mandate of 'taking a citizen-focused approach to understanding and preventing vulnerability'—surely require the project's impact on health to be reassessed, especially given the growing amount of research linking air pollution exposure to higher rates of asthma and COVID-19 cases and deaths, as well as studies that show higher vulnerability to infectious and other diseases among BAME populations in the UK (sources available upon request).
- Unfortunately, a letter sent by XR to Mariana Mazzucato has not led to the Renewal Commission's engagement on this matter.
- **Incompatibility with Camden Council's Climate Action Plan.** The Council has committed itself to undertaking a study to explore indirect (scope 3) emissions in more detail and to review 'local targets which could help reduce these emissions', as well as the Council's carbon-offsetting scheme, which requires 'participants to have done all that they can to reduce direct *and indirect emissions*' (emphasis added) before looking to offset. In line with these commitments, the Council should arguably be assessing how waste treatment activities such as EfW incineration affect its ability to meet direct and indirect emission targets. With respect to the Edmonton incinerator, that assessment should take into consideration:
  - the new facility's emissions of 700,000 tonnes of CO<sub>2</sub> per year (as calculated based on IPCC guidance, details available on request), meaning that **over the next 50 years, the facility would produce as much CO<sub>2</sub> as all of London currently emits in two full years;**
  - the (as yet unknown tonnage of) **embodied carbon** emissions involved in constructing the facility;
  - the **carbon-intensive energy generation** associated with energy-from-waste (in comparison to substantially more efficient and less carbon-intensive heat pumps, which draw energy from the UK national grid, which includes renewable energy sources);
  - the **CO<sub>2</sub> emissions associated with importing waste** from outside North London to ensure the facility operates at capacity; and
  - other emissions, such as **ultra-fine particulate matter** (PM1 and PM0.1), which are particularly hazardous to human health and cannot be filtered (evidence available on request).
- **Incompatibility with Camden Council's amended Constitution.** In September 2020, Camden Council became the UK's first local authority to embed responsibilities related to the climate and ecological emergency in its constitution. Reflecting the urgency and seriousness of the need to slow climate collapse, the constitution now entrusts Councillors with acting 'to mitigate and ensure resilience to climate change in recognition of the declared climate emergency' and charges scrutiny committees with a new responsibility to assess the effects of council policies and operations on greenhouse gas levels and on 'risks posed by climate change'. It also tasks the Council with considering the 'likely environmental consequences' of decisions, including by acting to 'mitigate and adapt to climate change, recording and detailing that consideration within the decision-making report'. The NLHPP is perhaps the first landmark case in which the new constitutional amendments may be applied.