

17 November 2021

**Request to make a deputation to Camden Council on 22 November 2021**

Submitted to Vicky Wemyss-Cooke at [vicky.wemyss-cooke@camden.gov.uk](mailto:vicky.wemyss-cooke@camden.gov.uk) on 17 November 2021

**Summary**

Climate Emergency Camden, XR Zero Waste, and noted medico-toxicologist Dr Vyvyan Howard would like to make a deputation to Camden Council on 22 November 2021 regarding the planned construction of a new incinerator in Edmonton, in the borough of Enfield.

The timing is critical. At its next meeting, on 16 December, the North London Waste Authority board members—including Cllr Adam Harrison and Cllr Richard Olszewski—are expected to vote to approve a decision to award the Edmonton incinerator construction contract to the only remaining bidder in the tender process, Madrid-based ACCIONA.

This deputation comes on the heels of COP26, during which ACCIONA's own CEO, José Manuel Entrecanales, referred to the proposed Edmonton plant as "massively oversized" and described the argument for energy-from-waste technology in London as "debatable" (see <https://www.letsrecycle.com/news/dispute-erupts-over-oversized-edmonton-efw/>). Mayor Sadiq Khan's office has forecast 950,000 tonnes of surplus EfW capacity for London if the Edmonton plant is built, with significant environmental, financial, and health implications.

The deputation also follows NLWA claims that downplay the health risks associated with toxic emissions from the proposed plant. Dr Howard will review the health risks associated with even the most advanced abatement technology, since efficiency drops for particulate matter with the smallest mass, which is also the most hazardous to human health. He will touch on issues such as de novo synthesis (which occurs after the gases have left the smokestack) and dioxins released by incinerators, most of which end up in toxic bottom ash. Even the most advanced plant will only add to local air pollution exceedances from other sources.

Camden Council has an opportunity to respond to this information by steering north London's waste management strategy towards a more circular economy, in line with the Climate Change Committee's call: "Achieving significant emission reductions in the waste sector requires a step-change towards a circular economy, moving away from landfill and incineration (and the associated methane and fossil CO<sub>2</sub> emissions), and towards a reduction in waste arisings and collection of separated valuable resources for re-use and recycling" (see p. 183 on <https://www.theccc.org.uk/publication/reducing-uk-emissions-2020-progress-report-to-parliament>). The deputation will encourage Camden Council to 1) call for a pause of the procurement process and 2) commission an independent review of the North London Waste Authority's plans to build a 700,000-tonne energy-from-waste incinerator in Edmonton, as detailed below.

**Persons who wish to address Camden Council**

- Dr Vyvyan Howard, [REDACTED]
- Tania Inowlocki, [REDACTED]
- Dr Rembrandt Koppelaar, XR Zero Waste

We thank you for considering this matter and, should our deputation be approved, we ask that you provide this deputation request, along with the attached suggestions, to all members of Camden Council before the meeting on 22 November. We look forward to working with Camden Council to help identify the most appropriate waste and resource management solution for Camden.

Sincerely,

Tania Inowlocki

(please send any correspondence to [REDACTED])

## XR Zero Waste

Waste management suggestions for Camden Council

Deputation on 22 November 2021

In view of environmental, financial, and health-related risks, this deputation encourages Camden Council to call for 1) a pause of the procurement process and 2) to commission an independent review of the North London Waste Authority's plans to build a 700,000-tonne energy-from-waste incinerator in Edmonton, as detailed below.

### Step 1: call for a pause of the procurement process

Time is short. The Council would need to act before **16 December**, when the board of the North London Waste Authority (NLWA), including Cllr Adam Harrison and Cllr Richard Olszewski of Camden Council, are due to vote on whether to award the construction contract to the only remaining bidder in the tender process, Madrid-based ACCIONA. Once the contract is signed, a cancellation fee could make a review of the plans prohibitively expensive.

### Step 2: commission an independent review

To ensure value for money and in view of concerns such as those raised by Mayor Sadiq Khan's office (which forecasts **950,000 tonnes of incineration overcapacity for London** if the Edmonton plant is built<sup>1</sup>) and ACCIONA's own CEO (who, during a COP26 panel event, acknowledged that the proposed Edmonton plant is '[massively oversized](#)'), a review would need to cover at least the following aspects:

1. **waste data:** Actual waste arisings are significantly lower than predicted in the NLWA's 2015 application for building consent. A review should assess the most recent waste data and anticipated local and national economic, legislative, social and policy drivers that could reduce overall and residual waste arisings, alongside risks associated with incineration overcapacity and stranded assets.
2. **competition for feedstock:** To what extent does additional and previously unforeseen incineration capacity — such as the 800,000-tonne Cory facility, which is not in the London Plan and thus was not factored into the Edmonton incinerator tender, and the nearby Rivenhall and Basildon plants — undermine the business case that relied on income from 128,000 tonnes from outside north London<sup>2</sup> for a 700,000-tonne incinerator in Edmonton? Increased recycling should also be considered, since the proportion of incineration feedstock shrinks as the recycling rate increases. The 2015 projections used to justify the current size of the plant are flawed and outdated; they need to be reassessed. Note also that increased competition for feedstock could lower anticipated gate fees.
3. **the cost of construction:** To what extent is the expected cost (which the NLWA website lists as [£600 million](#) although there is also a reference to £683 million) likely to be affected by Brexit-related increases in labour costs, recruitment difficulties, tariffs and other trade barriers, and by supply-chain-related hikes in the price of steel (which recently tripled), wood (which recently doubled), and other construction materials and components?
4. **new taxes or related measures:** How would a potential incineration tax, carbon emissions tax, and/or inclusion of waste incineration in the UK Emissions Trading Scheme affect the business case for the plant?
5. **regulatory changes:** How would the business case be affected by a requirement to remove recyclates prior to incineration, requirements to increase the range of materials collected at the kerbside, and/or increased regulation of district heating schemes?
6. **CCS:** No financial assessment (or technical feasibility assessment) for carbon capture and storage (CCS) has been carried out to date. These costs would need to be evaluated and

considered as part of the total costs. Also of note in this context is that Cory has already notified the Planning Inspectorate of its intent to submit a development consent order application for its massive CCS project in Bexley — which is expected to ‘deliver 1.5 million tonnes of CO<sub>2</sub> savings by 2030’. Cory is likely to secure access to limited carbon storage space and limited government funding for infrastructure, not only because it is moving faster than the NLWA and can rely at least partly on its own funding, but also because its combined capacity of around 1.44 million tonnes would dwarf Edmonton’s capacity and is thus likely to be given priority.

7. **pre-sorting facility:** The cost and impact of a mixed-waste material recovery facility has yet to be assessed. Such a facility would recover recyclables from black bags, removing at least 40% of the feedstock from the incineration stream and thereby reducing the capacity required to treat the remaining (truly non-recyclable) waste. Eunomia founder and waste sector authority Dr Dominic Hogg has warned that no EfW incinerators should be built without such technology, and Tomra’s recent white paper statement notes that ‘sending residual mixed waste directly to incineration or landfill without sorting plastics, metals, and other recyclable materials is no longer reasonable’.
8. **waste prevention:** How would greater investments designed to prevent material from entering the residual waste stream affect the sizing of the plant?
9. **transition to a more circular economy:** What benefits would accrue from a more concerted effort to shift away from incineration and towards a low-carbon, zero-waste economy, which would lessen the indirect costs and burdens of incineration, including ongoing resource extraction and related (scope 3) greenhouse gas emissions and ecological degradation? How many more jobs could be secured through greater investment in the reuse and repair sectors, which are known to generate far more jobs<sup>3</sup> than the waste disposal sector? How much recycling revenue could be generated through greater investment in pre-sorting and recycling infrastructure and technology?

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<sup>1</sup> Email from Anne-Marie Robinson, Principal Policy Manager, Greater London Authority, to XR Zero Waste, 16 November 2020, available upon request.

<sup>2</sup> See [http://northlondonheatandpower.london/media/mx1jblm3/ad05-05\\_fuel\\_management\\_assessment\\_lores.pdf](http://northlondonheatandpower.london/media/mx1jblm3/ad05-05_fuel_management_assessment_lores.pdf).

<sup>3</sup> See <https://www.theguardian.com/environment/2021/aug/04/repairing-and-reusing-household-goods-could-create-thousands-of-green-jobs-across-the-uk>.