



Haringey Labour Climate Action

(incorporating Hornsey and Wood Green and Tottenham Labour Parties)

December 2021

Special issue

The North London Waste Incinerator Project - Greenest Option or Whopping White Elephant?

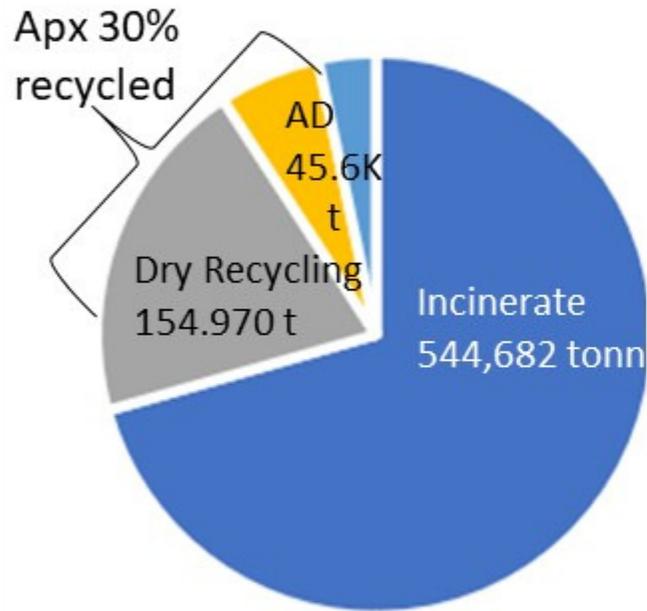
The Case for Pause, Review and Adapt to enable a Sustainable Publicly Owned Exemplar

Haringey Labour Climate Action have issued this special newsletter about the Edmonton incinerator project, as a critical vote on its future is imminent.

This document goes into the issues and details the areas that need further information before councillors in Haringey are in a position to exercise their Due Diligence obligations, addressing the concerns of many campaigning groups who include waste professionals recommending low carbon, low cost approach to North London Waste.

2020 Actual North London

771,000 tonnes*



- Total to Energy Recovery Facility (ERF)
- Collected for Biffa and Recyclers (inc Enfield)
- Food Waste and garden waste for Anaerobic (AD)
- Total to Landfill (25,712 tonnes)

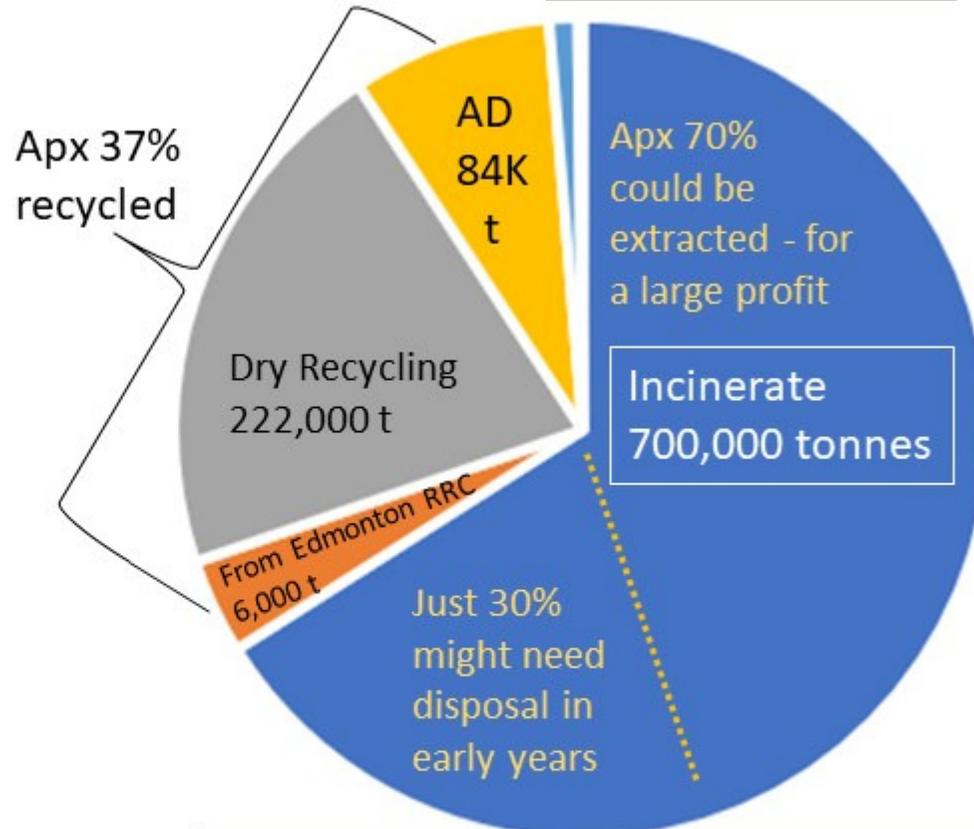
* *Left figures based on NLWA 2020 report.*

Right figures on an NLWA Fuel Management doc 2015

Too Big

Planned for 2027

1,059,684 tonnes*



Incinerator capacity is based on a 2014 paper assuming people would return to pre-recession levels of waste. It includes 128,000 tonnes from elsewhere

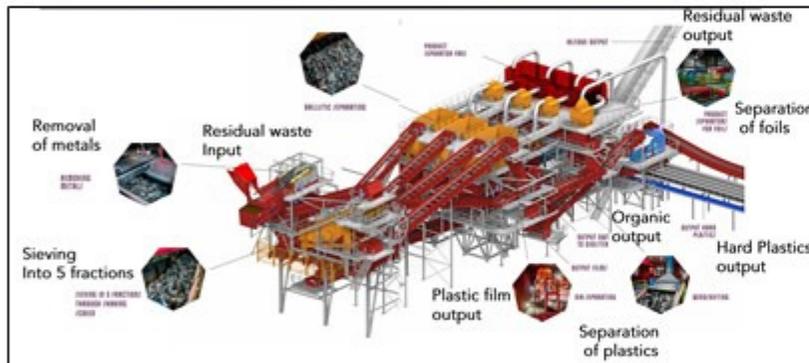
- Total to Energy Recovery Facility (ERF)
- Going to Recyclers from Edmonton
- Going to (Biffa) from Boroughs
- Going to Anaerobic from Edmonton
- Going to Landfill 12,000 tonnes
- Discharge of Gully Waste

Too Expensive

Costs and income - for an alternative for 700,000 tonnes of waste

Context: prior to a professional review of alternatives these figures have been taken from published papers and industry knowledge to inform North London residents of today's options not considered by the NLWA

	£M	£M	Current plan
Investment capital for latest Mixed Residual Waste sorting and extraction technology and anaerobic digestion capacity	-£350.0	-£683.0	Investment in incinerator



Annual Operational cost	-£15.4	-£25.7	Operating the incinerator
Cost of disposing of truly residual waste	-£19.7	-£1.4	Bottom Ash for roads etc
Sale of extracted plastic	£67.4		
Sale of extracted metal	£10.7	£1.8	Extracted from bottom ash
Sale of electricity from Biogas	£27.5	£43.9	Electricity from incineration
Sale of Digestate (will be more in future)	£0.0	£0.5	Sale of heat
Income from alternative	£70.5	£19.1	Income from proposal

Figures from Dr Rembrandt Koppelaar of mXRZeroWaste Dec 2021 <https://bit.ly/insteadofnewincinerator>

POSITIVE REVENUE & A LOWER CAPITAL OUTLAY

Too Polluting

Particles

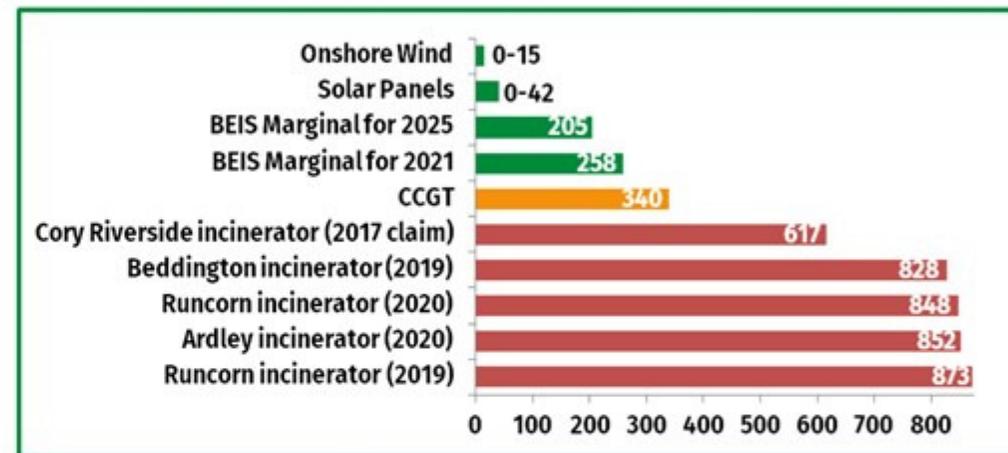


Picture taken 22nd Nov 2021.

Anecdotally this was steam from rubbish being hosed down. It was frightening and smelly for residents who do not believe that the Ultra Fine particles, which would still come from a new incinerator, would be safe

Carbon Emissions

COMPARISON OF FOSSIL CARBON INTENSITY OF ENERGY EXPORTED TO THE GRID FROM DIFFERENT ELECTRICITY GENERATION METHODS (GCO_{2E} /KWH)



From UKWIN's [2021 Incinerator GHG Guide \(p82\)](#)

Current figures exclude emissions from incinerating biodegradable waste, contrary to latest IPCC advice

Incinerating only truly residual waste would cause much lower emissions.

The maturity of Carbon Capture and Storage to remove carbon emissions by 2035 is purely speculative – whereas the high price tag is inevitable.

The North London Waste Incinerator Project - Greenest Option or Whopping White Elephant?

The Case for Pause, Review and Adapt to enable a Sustainable Publicly Owned Exemplar

Haringey Labour Climate Action have issued this special newsletter about the Edmonton incinerator project, as a critical vote on its future is imminent.

You may know that this project consists of a replacement incinerator - now named ERF or Energy Recovery Facility - for heat and power, and a Resource and Recycling Centre or RRC. The Resource and Recycling Centre has not been opposed, however the proposals for the £683m, 700,000 tonne ERF, planned to last from 2027 to 2050, have proved highly controversial.

A major concern is that this project was developed in 2017. It's based on projections which have been superseded by subsequent developments. While ERF is better than landfill for truly residual waste, the quantity of this can be dramatically reduced. The growing view is that the current outdated proposals are too big, too expensive and too polluting, and at risk of becoming an economic and environmental liability. They require review and adaptation to address new technology, policies, and the Climate Emergency, to be future-proofed, to become a sustainable exemplar for the Public Sector.

However on 16th December the North London Waste Authority (NLWA) board, made up of two representatives from **Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest** will decide whether to sign a contract with Acciona, their only remaining tenderer, for this ERF. There are increasing calls for any decision to be postponed until provision for review is incorporated.

These calls reflect the growing support for pause and review, including motions passed by trade unions, CLPs, and the London Party Conference, cross-party London Assembly Members including Joanne McCartney and Leonie Cooper, MPs including David Lammy, Sir Iain Duncan Smith, Jeremy Corbyn, and Kate Osamor, and numerous other north London stakeholders. There are also questions as to why this decision has been brought forward from mid-2022, as originally proposed, whilst doing so will avoid the likely inclusion of electricity from waste in the UK Emissions Trading Scheme (ETS), establishing how likely it is that Edmonton might obtain Carbon Capture funding in the forthcoming government awards, and the imminent Defra re-assessment of incinerator capacity requirements.

Meanwhile NLWA continue to issue extensive publicity about the merits of the project. You may also have seen Mike Hakata's recent letter to Labour Members setting out the case for it, based on statements made by the NLWA.

These statements have been widely and hotly disputed, and alternatives have been put forward for maximising waste management potential and minimising residual waste for incineration. We feel it is timely and essential to present this alternative perspective to Labour members in Haringey. The yellow table below shows the most common statements made by the NLWA, the evidence which contests these, and the need to review them accordingly.

TOO BIG

What NLWA say:	What campaigners and experts say:	Information needed before proceeding:
That the London Region needs a 700,000 tonne incinerator	The 2017 sizing preceded approval of additional facilities eg Cory. The GLA estimate of 950,000 tonnes excess capacity around London must be factored in ¹	When the UK publishes its realistic waste figures for 2023/24 volumes for North London can be quickly reassessed.
That size should be based on 50% recycling rates .	Defra will publish updated figures imminently on recycling and waste volumes based on new legislation, although the NLWA Boroughs have very low ambitious plans. ² . Available incinerators could cater for reduced residuals. ³	The capacity needs to be reassessed to allow for Defra's update based on new legislation. The UK still holds the COP26 presidency so will support this.
Waste can be imported from a 50mile radius if recycling reduces London supplies	This is based on unsubstantiated assumptions about waste levels and closure of other plants. It does not consider emissions from transporting to Edmonton. The NLWA remit is to handle North London waste, not as a commercial enterprise . A smaller plant /greater flexibility would better deal with reduced supplies	A fully detailed and substantiated assessment of future waste loads and emissions from transport is required. Clarification of NLWA's remit as a non-profit public body is required.
The new resource and recovery facility will promote recycling and associated jobs	There are no clear figures currently proposed for new jobs, or how these could be increased through more local recycling processing or better recyclable extraction facilities.	A detailed breakdown should be available of new additional recycling provision on and off site (and the associated local jobs) which should incorporate best practice improvements in line with current developments
The new plant will only incinerate residual waste that would otherwise go to landfill	Current residual waste contains 26% readily recyclables and 27% food ⁴ . Whilst better source separation would reduce this, the project does not include the latest material recovery facilities, which could retrieve around 70% of 'waste' at a profit ensuring that only truly residual waste is incinerated in line with current policies. ⁵	A detailed feasibility for material recovery including providing this on site is essential, as well as figures for waste currently going to landfill.

TOO EXPENSIVE

There is no acceptable alternative to be costed - only ocean dumping, export or landfill.	Retrieval from residual to sell plastic and metal and to anaerobically digest biodegradables as an alternative has been proposed and costed by campaigners from the waste industry. ⁶	We need detailed updated costs factoring in up to date opportunities including extracting recyclables, smaller incinerator, outsourcing disposal etc
The cost, recouped by the Borough Levys, is best value	The cost of alternative technologies would be much lower. An oversized incinerator and plans to build two streams and run just one, or buy in waste are far from value for money. Councillors in each Borough have a duty to scrutinise.	Best value is to maximise on income from recyclables and right size a new incinerator at Edmonton if a cost effective option.

TOO POLLUTING

That Energy for Waste incineration produces low carbon electricity.	EfW produces much higher carbon emissions than the grid, which continues to decarbonise. ⁷ – NLWA figures also exclude burning food and garden waste, contrary to latest IPCC advice. ⁸	We need detailed updated figures which take account emissions from food and garden waste and decarbonisation of the grid.
That heat from EfW is lower carbon than Gas heat	Heat from EfW should be compared with heat from heat pumps in accordance with current trends and policies rather than gas heating.	We need updated comparisons in light of emerging heating technologies and policies eg CCC & London Councils
The plant will have Carbon Capture & Storage added in 2035	This depends on highly uncertain technology, uncertain Government support and rising emissions in the mean time. ⁹ And CCS must not become an excuse to incinerate more than the absolute minimum of truly residual waste.	We need a transparent and realistic assessment viability and timescale of CCS at Edmonton, including costs and land-take, and options for different amounts of incineration.
That, installing the latest air pollution measures, achieves no health risk to residents.	Unregulated, and Ultra Fine particle emissions have not been considered. These are the ones that affect the health of everyone in the path of the 'plume' disproportionately disadvantaged and BAME residents. ¹⁰	Studies on unregulated, and Ultra Fine particle emissions must be considered.

There are alternatives:

Experts involved in the Pause and review campaign, including experienced engineers in the waste industry, have suggested the following;

1. Initiating a major pioneering waste prevention re-use and recycling improvement fund, using income from the Extended Producers Responsibility Fund due to be implemented in 2023-24.
2. Invest in a 700,000 tonne mixed waste sorting and plastics recycling facility at the EcoPark, using the best in class technology to extract 70% of recyclables including food and garden waste to sell for significant profit and continue to invest to reach 100% recovery. This would supplement waste separation at source to substantially reduce the amount of residual waste for incineration and enable a smaller plant, with both lower emissions and lower cost
3. Work with the 7 London boroughs to swiftly enhance their Reduction and Recycling Plans, and ensure that these are Specific, Measured, Agreed, Realistic and Timely (SMART) to deliver the Mayor's 65% recycling target. These should include the measures in the Environment Bill such as separate recycling bins regardless of when these are implemented nationally.

Returning to the decision date originally published to award the contract would allow a pause and review in order to update projections, assess alternative options and adapt as required. Crucially, it would enable the scope for **dynamic reassessment to be built into the terms of the contract**, to ensure the project keeps up with a rapidly emerging developments and avoids becoming a stranded asset. It would allow assessment of costs arising from Carbon Capture & Storage and a potential carbon tax, and relative costs for a smaller plant and flexible wastes streams to be available when the decision is made. It would provide time for a citizens assembly and for NLWA and stake holders to jointly visit and assess CCS and Waste Retrieval plants, and councils with much higher recycling rates. It would enable councillors to make the informed decision they are obliged to by law. Far from rubbish piling up in the streets, as depicted in NLWA media campaigns, the UK is working on showing leadership following on from COP26 and is on track to massively reduce residual waste and tax electricity from waste.

The NLWA could be a leader in a green solution to dealing with waste.

A selection of quotes about the incinerator

The CEO of Acciona, Jose Manuel Entrecanales - At a COP26 event the CEO of Acciona (the only remaining bidder for the construction of the new Edmonton incinerator), said: ***'The massive oversizing of the plant is something that is beyond our control. It's a specific issue of the plant. About the waste-to-energy concept, you would probably agree with me that it's a transition mechanism—maybe not in London, that is a debatable argument—but in a great portion of the world, it is the only possible solution for the time being'*** (skip to min 33 in <https://vimeo.com/showcase/8982541/video/643448727>).

Martin Capstick, NLWA CEO stated in Nov 2021 that ***"If the energy recovery facility is not built, • waste will have to be transported to other facilities"***
<https://drive.google.com/file/d/1XUAZq0HXV7AAAdj5ec7Buf8flvZggc7R/view>

David Lammy letter to NLWA Sept 2021 – ***"I share the concerns of Tottenham CLP on this issue and have recently written to the North London Waste Authority to urge them to pause and reconsider their approach to the incinerator at Edmonton EcoPark."***

London assembly report on energy from waste 2018 - ***"Landfill and EfW are the least desirable forms of management in the waste hierarchy"***.

“Investing in more EfW can negatively affect long term recycling rates. This investment needs to be paid for by an assured income stream, usually through contracts with local authorities to pay the EfW operator to take waste.

A report to the British Society for Ecological Medicine noted a link between incineration and cancers, birth defects and cardiovascular mortality. *Furthermore, incineration should not be exempt from London’s ambition to improve air quality. It is therefore **essential that London burns less organic and plastic waste, as well as recyclable materials.**”* “Recyclable materials are unnecessarily going to incineration, including **materials that are potentially hazardous to health when burnt.**”

Parliamentary debate 11/02/ 2020 (Sharon Hodgson, Labour MP for Washington and Sunderland West) - “Surely it is counter-productive to have a landfill tax to deter burying plastic, which causes no CO2, but not to have an incineration tax for incinerating plastic, which causes masses of CO2.”

Alan Whitehead, Shadow Minister for Energy and supporter of the Green New Deal “**the age of incinerators is over**” “it is clear that a moratorium should be placed on the building of new incinerators.”

Professor Ian Boyd Former Chief Scientific Advisor to Defra, Parliament’s Environment, Food and Rural Affairs (EFRA) Committee on Wednesday (31 January 2018). “I think that if you are investing many tens of millions, hundreds of millions, in urban waste incineration plants – and those plants are going to have a 30- to 40-year lifespan – you have to have the waste streams to keep them supplied” ... “Now, **that is the market pull on waste, so it encourages the production of waste, it encourages the production of residual waste**”.

Committee for Climate Change (CCC) 2020 - “If EfW usage continues to rise unchecked, then its emissions will exceed the CCC [zero carbon] pathway while potentially undermining recycling and reuse efforts.”

Sadiq question time 22.11.21 - “I have been clear that London **does not need any additional incineration capacity.** “Given this, I am now focused on ensuring that the Edmonton facility and all London’s incinerators **only manage truly non-recyclable waste**” (note truly non-recyclable waste is not what is left out as residual)

¹ After Mayor Sadiq Khan dropped his judicial review of the Cory 2 incinerator, City Hall forecast 950,000 tonnes of incineration overcapacity for London if the Edmonton plant is built (email from Anne-Marie Robinson, Principal Policy Manager, Greater London Authority, to XR Zero Waste, 16 November 2020)

² The Reduce and Recycle Plans (RRPs) for London are at <https://data.london.gov.uk/dataset/waste-plans>

³ Defra data shows that higher incineration rates correlate with lower recycling rates: <https://ukwin.org.uk/oppose-incineration/#recycling>

⁴ Analysis of the composition of waste at https://wrap.org.uk/sites/default/files/2020-11/WRAP-National%20municipal%20waste%20composition_%20England%202017.pdf page 11

⁵ Defra’s [Resources and Waste Strategy](#), DEFRA reports: ‘In 2017, an estimated 53% of residual waste consisted of *readily recyclable* materials, with only 8% being completely unavoidable (emphasis added). Defra concludes that **about 90% of materials in residual waste streams are either recyclable** or could be replaced with materials that can be recycled, based on existing technologies and those under development

⁶ [Capstick presentation to the Haringey Environment and Community Safety panel Nov 2021](#) stated that “If the energy recovery facility is not built, • waste will have to be transported to other facilities” as the realistic alternative. Although transporting 700,000 tonnes of waste to other facilities is not a serious alternative, transporting some truly residual waste, after treatment, should be considered for cost and carbon emissions.

⁷ UKWIN’s [2021 Incinerator GHG Guide](#) (p82)

⁸ The NLWA says that Calculations for carbon emissions are developed using the scientific standards set by the Intergovernmental Panel on Climate Change (IPCC) (Guidelines for National Greenhouse Gas Inventories – 2006) and Defra advice. This guidance states that biogenic waste (like food, paper and wood) should not be included in national emission inventories for greenhouse gasses. This is because plants sequester carbon when they grow. only the fossil content is included when calculating greenhouse gas emissions... (letter to Dr Ed Tranah) However the IPCC has more recently issued this advice at [IPCC FAQ: Do the IPCC consider biomass used for combustion carbon neutral?](#) says “The approach of not including these emissions in the Energy Sector total **should not be interpreted as a conclusion about the sustainability or carbon neutrality of bioenergy.**”

⁹ <https://zerowasteurope.eu/library/ccs-for-incinerators-an-expensive-distraction-to-a-circular-economy/> says that “Carbon capture is a distraction instead of a solution, to incinerators’ carbon problem” But Cory in Bexley has already notified the Planning Inspectorate of its intent to submit a DCO for CCS in Bexley, to ‘deliver 1.5 million tonnes of CO2 savings by 2030’ (<https://www.corygroup.co.uk/media/news-insights/cory-announces-plans-worlds-biggest-energy-waste-decarbonisation-project/>)

¹⁰ recent GLA-commissioned research finds that 15 deaths in London are attributable to waste incineration emissions every year (https://www.london.gov.uk/sites/default/files/gla_efw_study_final_may2020.pdf and https://camden.public-i.tv/site/mg_bounce.php?mg_a_id=54742&mg_m_id=9876&language=en_GB) (20:23).