



**STOP THE  
EDMONTON  
INCINERATOR  
NOW**

**SERA  
PRESENTATION**

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13<sup>TH</sup> AUGUST 2020

**@STOPTHEREBUILD**

# THE EDMONTON INCINERATOR

- Burns 90% of the black bins of 7 North London boroughs:  
Capacity to burn 500,00 tonnes of waste per annum
- Has been operational since 1969
- Operated by London Energy wholly owned by the North London Waste Authority (NLWA) composed of the 7 boroughs
- Board composed of 14 councilors, 2 from each of the 7 boroughs and is Labour controlled. Chaired by Cllr Clyde Loakes of Waltham Forest.



# THE NLWA'S PLANS FOR THE 'NORTH LONDON ECOPARK'



- Current incinerator coming to the end of its life
- Plans to rebuild first put forward by NLWA 10 years ago
- Assessments and consultation conducted in 2014-2015
- Development Consent Order (DCO) granted by the Government in February 2017- new incinerator so large it is **deemed national infrastructure**
- Project also includes a recycling centre and a visitor centre
- Plan for both energy and heat generation for the Meridian Water development
- **Site clearance and preparation works have begun. Building works for the incinerator out to contract**
- Plan is for the new incinerator to be up and running in 2025, 2027 at the latest. Could be operational until 2075.

All information available at <http://northlondonheatandpower.london/>



WE CALL ON THE  
NLWA TO  
IMMEDIATELY  
PAUSE AND  
REVIEW ITS PLANS  
TO REBUILD AND  
EXPAND THE  
EDMONTON  
INCINERATOR

# NLWA MYTH BUSTER I: THERE HAS BEEN 'EXTENSIVE CONSULTATION'

**The Truth: no one knows about this plan:**

**Directly affected communities, MPs and aspiring MPs, Labour party members, environmental activists, the people of North London do not know about this plan.**



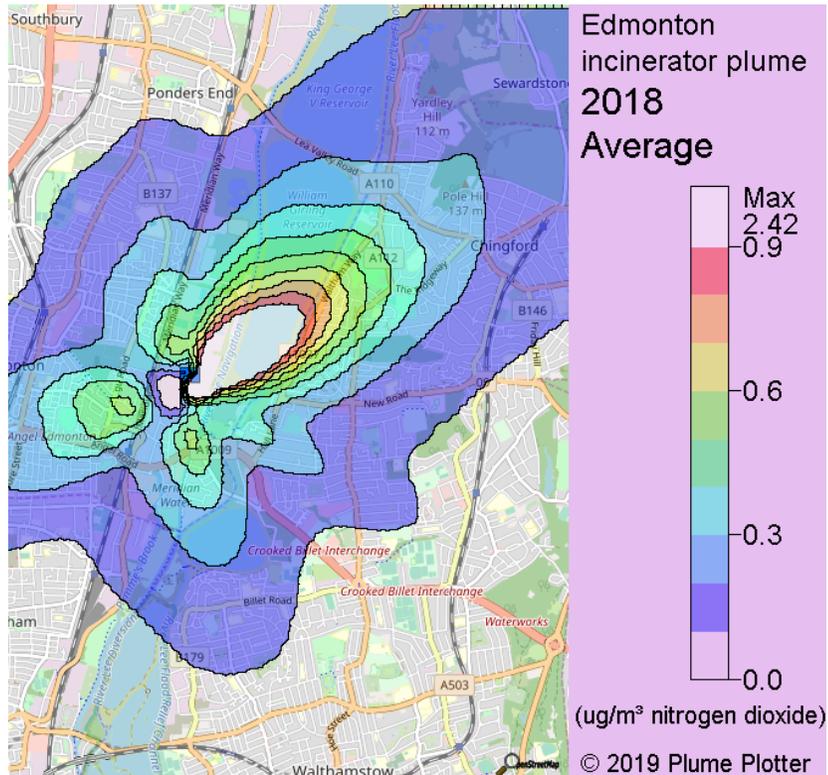
**Consultation 'very likely' not as extensive as it would have been had there not been an existing incinerator on site** *Source: Discussion with Iain Duncan Smith MP*

*Sources: Emails to me, available on request, reported experience, direct experience, witness statement to Court*



Public opinion and concerns about air pollution, climate change and plastics have evolved significantly since 2015- the NLWA does not have the consent of communities, residents of North London and their MPs today

# NLWA MYTH BUSTER 2: 'WE'RE WORKING HARD TO IMPROVE AIR QUALITY IN NORTH LONDON'



**The Truth: The new incinerator will lock some of the poorest wards in London, majority BAME, with poorer air quality for 50 years**

- 2014 Health Impact Assessment of 2014 for construction phase only
- No studies were carried out on cumulative impacts

*Source: NHLLP website, Fol request*

- There has been a huge increase in our understanding of the health impacts of air pollution since the DCO was granted, and increasing recent evidence that chronic exposure to air pollution increases the risk of poor outcomes with COVID-19

**Google 'Plume Plotter Edmonton Places' to see the reach of the plumes and potential ground level pollution concentration on primary schools.**

# INCINERATORS EMIT VAST AMOUNTS OF PARTICULATE MATTER AND OTHER POLLUTANTS

**The current Edmonton incinerator emits some 1.8 billion PM 2.5 per second**

**There is no commercially available equipment to filter the emissions of these microscopic particles and incinerator operators are not required to monitor where they land**

- DEFRA: 'There is no safe level for particulate matter (PM10, PM2.5)' Source: DEFRA, PHE and Local Government Association, Air Quality: A Briefing for Directors of Public Health (DEFRA, March 2017)
- Waltham Forest has the second highest PM 2.5 concentration of ALL boroughs in the country

<https://londonist.com/london/news/most-highest-pollution-toxic-london-boroughs>

- Emission limits are routinely breached and the Environment Agency does not have the capacity to monitor and penalise for these breaches: in August 2018 for example, the monthly daily mean for NOx exceeded the Daily NOx Emissions Limit Value (ELV)
- Concerns remain of health impacts of pollutants even *within legal limits*: DEFRA: 'NO2 is associated with adverse health effects at concentrations at and below the legal limits.' Source: DEFRA, PHE and Local Government Association, Air Quality: A Briefing for Directors of Public Health (DEFRA, March 2017)

## THE NLWA, ENFIELD COUNCIL ARE FAILING TO APPLY THE PRECAUTIONARY PRINCIPLE...



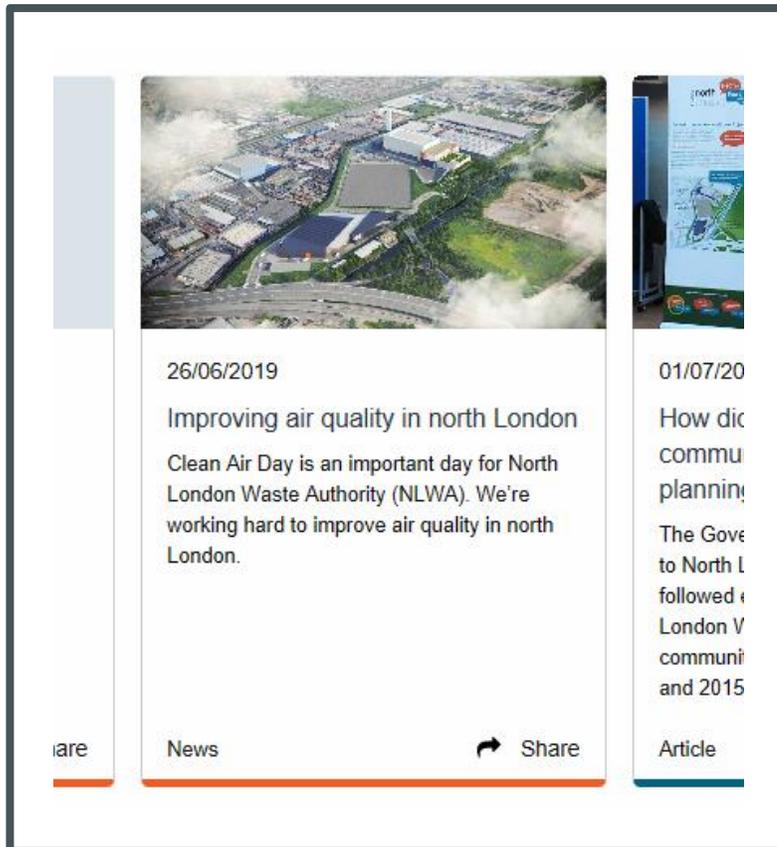
‘Researchers have found no link between exposure to emissions from municipal waste incinerators (MWIs) and infant deaths or reduced foetal growth. However, they show **living closer to the incinerators themselves is associated with a very small increase in the risk of some birth defects, compared to the general population.**’ (2019)

Source <https://www.imperial.ac.uk/news/191653/major-study-finds-conclusive-links-health/>

■ Environmental Journal of Environmental Research and Public Health

Exposure to emissions derived from waste incinerators in an urban setting leads to body accumulation of specific metals in children. (2020)

# AND THE NLWA AND THE MAYOR OF LONDON APPEAR REMARKABLY UNFUSSED....



26/06/2019

**Improving air quality in north London**

Clean Air Day is an important day for North London Waste Authority (NLWA). We're working hard to improve air quality in north London.

News Share

01/07/20

**How did we plan for the future?**

The Government's plan for the future of London followed the recommendations of the London Vision Commission report in 2015.

Article

**Clyde Loakes: 'We haven't been waiting 50 years for a Public Health England report'**

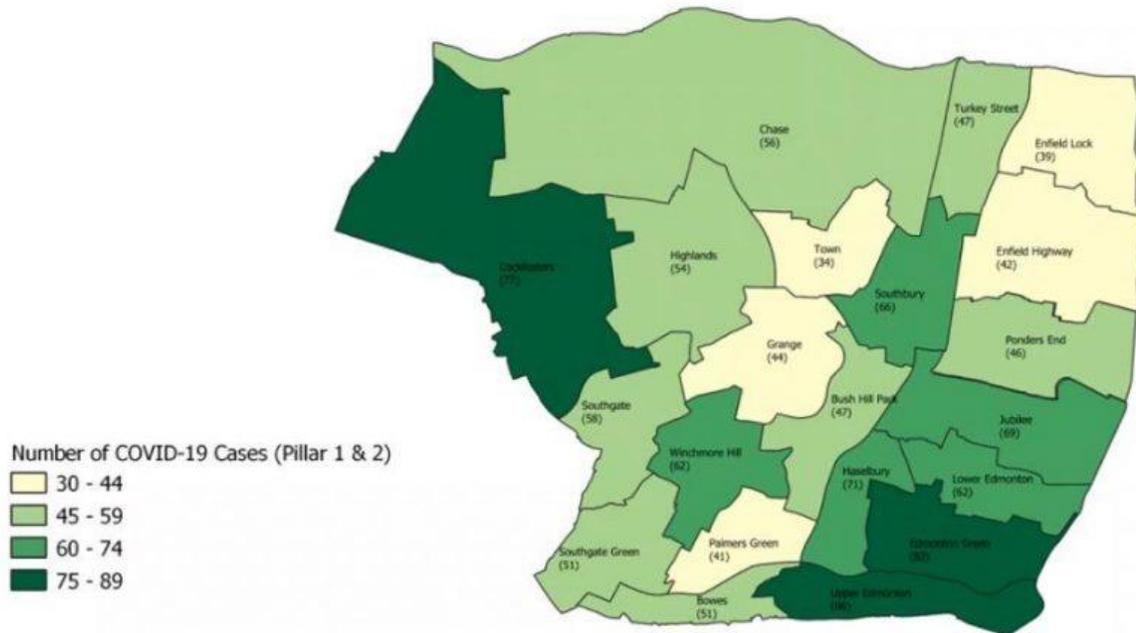
*Source: Waltham Forest Echo, 2017*

**Sadiq Khan: 'London's air is a toxic air health crisis and the last thing we need, in our modern green global city is another harmful waste-burning incinerator polluting our city. Emissions from incinerators are bad for our health, bad for our environment and bad for our planet.'**

*Source: 2019 : <https://www.london.gov.uk/press-releases/mayoral/stop-allowing-new-toxic-waste-incinerators>*

# THE INCINERATOR IS THE PRODUCT OF A CLASSIST, RACIST PLANNING PROCESS

Cumulative COVID-19 Cases in Enfield, by Ward (06 March – 08 July 2020)



Cambridgeshire County Council refused planning permission for building on the grounds that it would have a detrimental impact on the landscape and nearby historic buildings

<https://www.cambridgeindependent.co.uk/news/victory-for-campaigners-against-waste-incinerator-9113171/>

Source: Public Health England - Case Test Results; most recent data available 13-Jul-20.  
• Enclosed in brackets is the ward specific cumulative number of COVID-19 cases.



## NLWA MYTH BUSTER 3: WE NEED AN INCINERATOR TO DEAL WITH NORTH LONDON'S RESIDUAL WASTE

- **The Truth: the planned incinerator is THREE TIMES too large for North London's residual waste needs**
- **The plan is now to burn commercial waste in addition to residual waste, and import waste from other boroughs beyond North London- a plan that has not been costed, assessed or consulted on**

**80% of what is burnt in the current incinerator is recyclable or compostable- not residual waste**

Average composition by weight	
Paper	13.40%
Card	6.60%
Dense plastic(e.g.various plastic bottles – PET, HDPE, PP - pots, tubs, trays and other non-packaging plastics)	8.00%
Plastic film	7.80%
Textiles	4.80%
Glass	4.40%
Miscellaneous combustibles(e.g. wood, sanitary waste)	8.10%
Miscellaneous non-combustibles(including construction and demolition waste, and other waste e.g. crockery, plant pots, cat litter)	0.90%
Ferrous metal	2.30%
Non-ferrous metal	1.50%
WEEE(waste electrical and electronic equipment)	1.10%
Hazardous(waste containing harmful chemicals, clinical waste and sharps)	0.50%
Organic non-catering	3.20%
Organic catering	33.80%
Fines(material that is too small to identify)	3.70%
<b>Total</b>	<b>100.00</b>

‘It is clearly the case that some of that material could have been recycled; the recycling rate in the North London boroughs is currently around 30%, which is unacceptable when we are facing a climate emergency.’  
Clyde Loakes

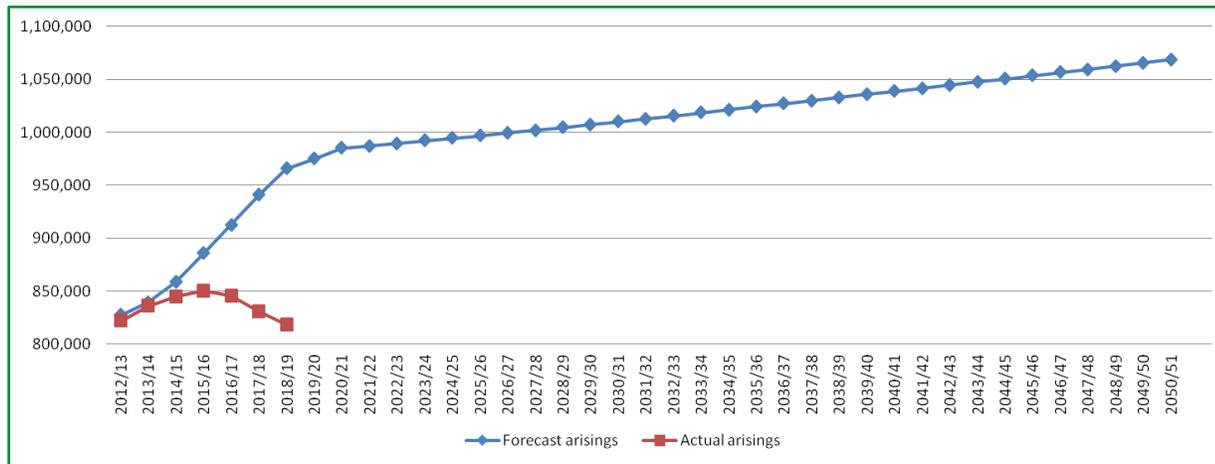
Sources: Email from Clyde Loakes to Stella Creasy MP, on one of our campaigners’ request, 13<sup>th</sup> August 2019, based on household black bin sample conducted in 2016

# THE CAPACITY IS PREDICATED ON FAILURE TO MEET TARGETS

- Current household recycling rates are about 30% across North London- below the national average
- **Some councils already recycling at 65%**
- **Since the DCO was approved, new EU legislation to be incorporated into UK targets sets municipal recycling targets of 60% by 2030 and 65% by 2035.**
- **Sadiq Khan has set a 70% recycling target for London by 2035.**

# AND ON WASTE ESTIMATES THAT HAVE ALREADY BEEN PROVEN WRONG

Discrepancy between 2014 forecast for NLWA's Local Authority Collected Waste (LACW) arisings and actual arisings as reported by Defra



	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
<b>Forecast LACW arisings</b>	839,397	858,761	885,513	912,498	940,781	965,755
<b>Actual LACW arisings</b>	836,052	845,043	850,296	845,776	830,955	818,285
<b>Discrepancy (in tonnes)</b>	3,345	13,718	35,217	66,722	109,826	147,470

Sources:

[http://northlondonheatandpower.london/media/nvlttnnz/economia\\_nl\\_wa\\_waste\\_forecasting\\_project\\_report\\_final\\_v1-1.pdf](http://northlondonheatandpower.london/media/nvlttnnz/economia_nl_wa_waste_forecasting_project_report_final_v1-1.pdf)  
reported Local Authority Collected Waste for 2013/13 to 2017/18 at:

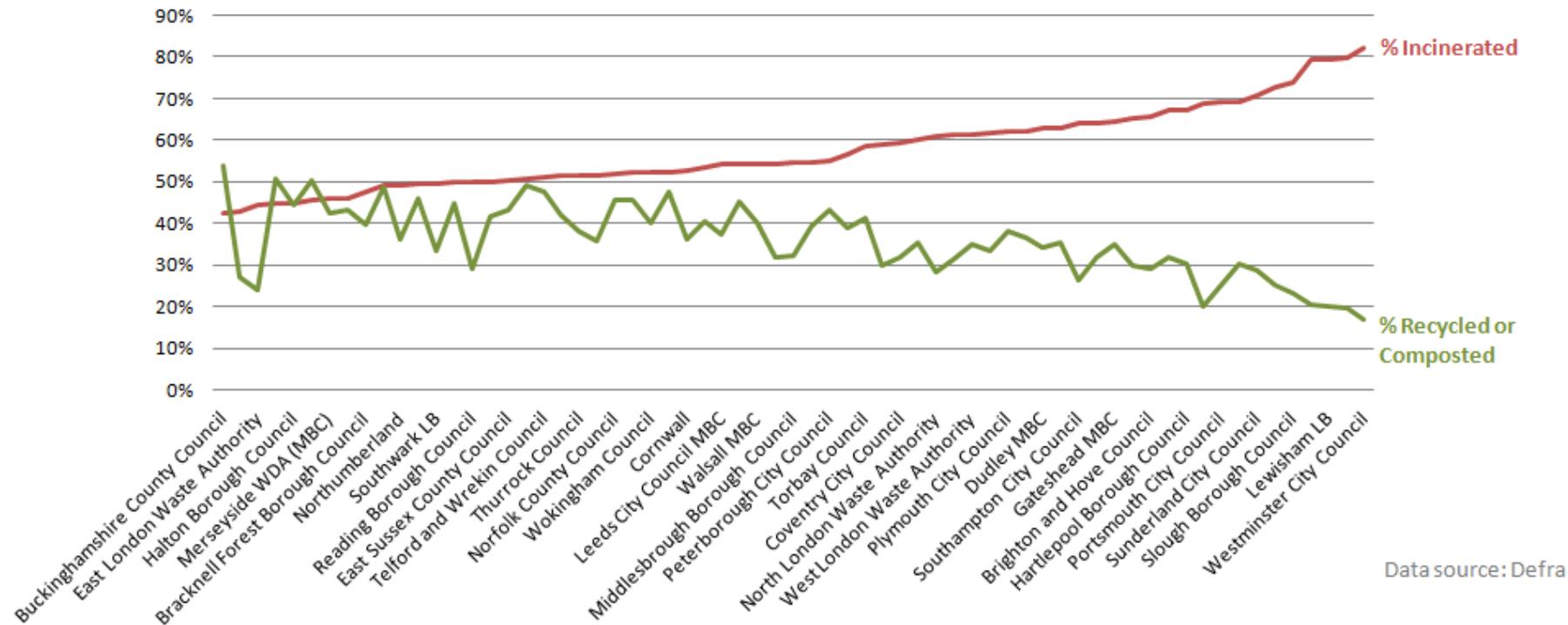
- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/310067/Copy\\_of\\_2012-13 ANNUAL publication LA level WITHOUTLINKS3.xls](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/310067/Copy_of_2012-13_ANNUAL_publication_LA_level_WITHOUTLINKS3.xls) Table 1 Column F Row 227

- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/386270/LA and Regional spreadsheet 2013-14 publicationv2.ods](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/386270/LA_and_Regional_spreadsheet_2013-14_publicationv2.ods) Table 1a Column F Row 227

- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/763211/LA and Regional Spreadsheet 201718.ods](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/763211/LA_and_Regional_Spreadsheet_201718.ods)

# THE INCINERATOR WILL LOCK US INTO HIGH WASTE PREVENTION AND LOW RECYCLING RATES

**Municipal waste treatment rates for English Councils  
with above-average incineration rates (2017/18)**



Data source: Defra

# NLWA MYTH BUSTER 4: THE INCINERATOR IS 'CRUCIAL TO TACKLING THE CLIMATE EMERGENCY'

**The Truth: There is widespread consensus that the best approach to waste management from a GHG perspective is waste prevention, recycling, and MBT/ landfill for genuine residual waste**

Therese Coffey, Resources Minister 'In environmental terms, it is generally better to bury plastic than to burn it.' *Hansard - House of Commons debate on Non-recyclable and Non-compostable Packaging (UK Parliament, 23 January 2018)*

The Scottish Government:  
'When plastics are switched from landfill to incineration, the net impact in terms of climate change is, under most reasonable assumptions, strongly negative.'

— *Partial Business and Regulatory Impact Assessment for the Landfill Tax Bill 2012 (The Scottish Government, October 2012)*

'MBT (mechanical biological treatment)-landfill provides the best emissions performance in terms of the treatment/disposal of residual waste. It essentially involves landfilling somewhat stabilised wastes with some material recovery. The magnitude of the environmental impact depends on the extent to which the waste is stabilised.'

*Source : The Economics of Waste and Waste Policy (Defra Waste Economics Team,) Page 14*

# INCINERATION PRODUCES VAST AMOUNTS OF GREENHOUSE GASES

**For every tonne of waste burned, typically around one tonne of CO<sub>2</sub> is released into the atmosphere**

<https://ukwin.org.uk/files/pdf/UKWIN-2018-Incineration-Climate-Change-Report.pdf>

‘Between 0.7 and 1.7 tonnes of CO<sub>2</sub> is generated per tonne of MSW [Municipal Solid Waste] combusted’

Pollution inventory reporting – incineration activities guidance note, available from:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/296988/LIT\\_7757\\_9e97eb.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/296988/LIT_7757_9e97eb.pdf)

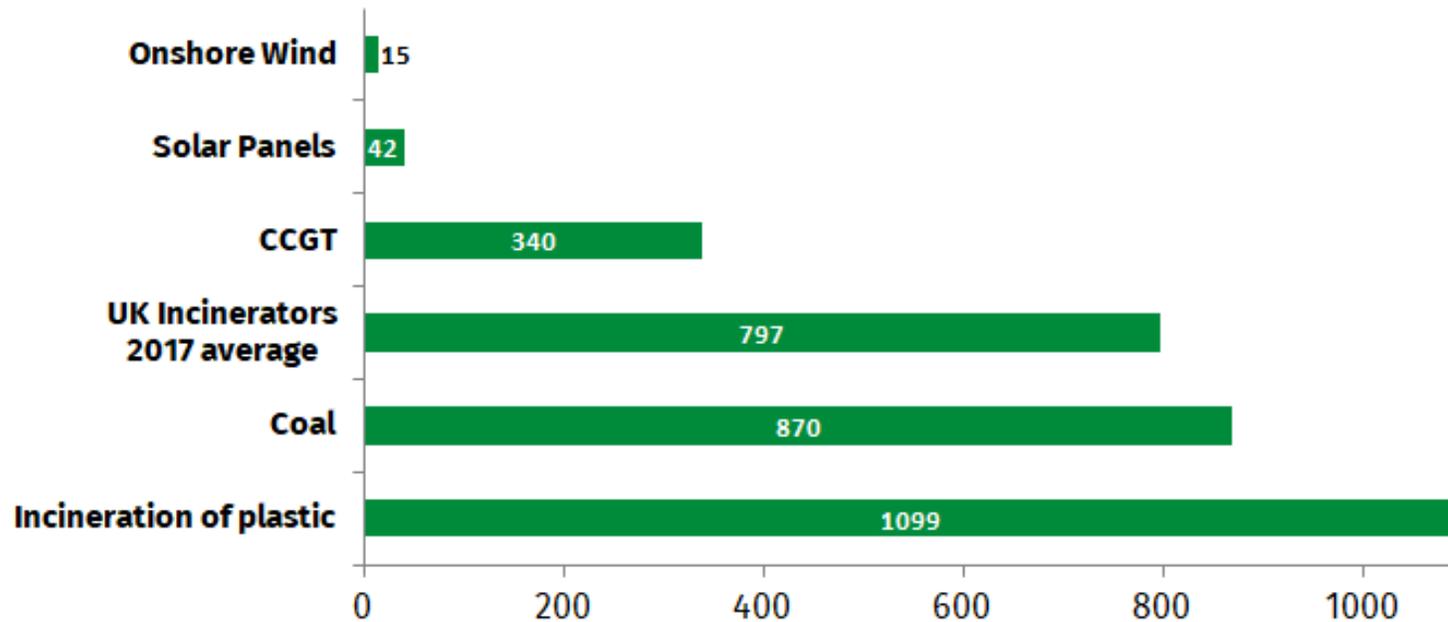
**The proposed incinerator has the capacity to burn 700,000 tonnes of waste per annum and could be operational for 50 years:**

- **700,000 tonnes of CO<sub>2</sub> emitted yearly up to 2075**
- **700,000 tonnes of burnt waste expected to produce 78 Megawatts of power yearly**

**Back of the envelope calculations- the new incinerator will produce as much GHG over 50 years as the whole of London does in 2, or the burning of the waste of a North London borough represents approximately 10-15% of its overall emissions**

# THE ENERGY GENERATED FROM INCINERATORS IS NEITHER RENEWABLE NOR LOW CARBON

Fossil carbon intensity of energy exported to the grid (gCO<sub>2</sub>/kWh)



<https://ukwin.org.uk/oppose-incineration/#climatechange>

<http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/environment-food-and-rural-affairs-committee/plastic-food-and-drink-packaging/written/104997.pdf>

<https://ukwin.org.uk/files/pdf/UKWIN-2018-Incineration-Climate-Change-Report.pdf>

9 Table 1: Electricity emissions factors to 2100, kgCO<sub>2</sub>e/kWh, available from:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/696677/Data\\_tables\\_1-19\\_supporting\\_the\\_toolkit\\_and\\_the\\_guidance\\_2017\\_\\_180403\\_.xlsx](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/696677/Data_tables_1-19_supporting_the_toolkit_and_the_guidance_2017__180403_.xlsx)

# THE PROPOSED INCINERATOR GOES DIRECTLY AGAINST EFFORTS TO DECARBONISE THE ENERGY GRID AND NET ZERO TARGETS

- Claims of emissions savings linked to energy generation depend on the energy displaced- the median emissions factor is decreasing and will decrease further to net zero by 2050, or earlier
- A 2019 Future Homes Standard , to be introduced by 2025, requires new build homes to have low carbon heating- will this preclude incinerator heat now or during the lifespan of the incinerator?
- **The proposed incinerator will soon be one of the dirtiest forms of energy generation feeding into the grid**
- **No plans for Carbon capture and storage, despite the CCC saying this will be necessary**

# THE NLWA IS LYING WHEN IT SAYS THE INCINERATOR IS NECESSARY FOR THE CLIMATE EMERGENCY

- DCO granted under previous planning regulations which did not require consideration of climate change impacts
- Commissioned a study in 2019 where there was a clear conflict of interest
- Ramboll, on the NLWA's instruction, did not follow the Committee on Climate Change methodology for calculating emissions from the incinerator; included counterfactuals that no longer hold true; the parameters were narrow
- Unable to refute extensive research by Extinction Rebellion and others on climate impacts
- Unable to provide data to substantiate their emissions claims- Year on year data until 2075 on Projected waste volumes; Projected energy generated; Projected emissions intensity of the energy generated; Projected median emissions intensity of the grid as it decarbonises

<http://northlondonheatandpower.london/news/carbon-impact-of-2-million-londoners-could-increase-if-waste-facility-not-replaced/>

<http://northlondonheatandpower.london/media/d3blngkv/2565-203-supplier-guide-for-market-information-day-final.pdf>

<https://walthamforest.gov.uk/content/climate-emergency-commission>

<http://nlwa.gov.uk/news/carbon-impact-of-2-million-londoners-could-increase-if-waste-facility-not-replaced/>

NLWA Witness Statement to Court, October 2019

Correspondence between a campaigner with Hackney City Council, August 2019 and with BEIS and the EA, December 2019

<https://www.hamhigh.co.uk/news/environment/north-london-incinerator-project-cost-soars-to-1-2-billion-1-6422599>

# NLWA MYTH 5: THE INCINERATOR IS THE MOST 'COST EFFECTIVE OPTION'

**The truth: the costs for the full 'EcoPark' ran at £650 million in 2014. New cost estimate of £1.2 billion in November 2019- close to double in 5 years. We do not know whether this is the most cost effective option since alternatives have not been sufficiently analysed**

Paid for through public borrowing, with loan payback period of 40 years.

- Effect on individual council taxes?
- Future incineration tax?
- Future inclusion of incineration in the EU Emissions Trading Scheme or similar?
- <https://www.crowdjustice.com/case/make-incineration-polluters-pay/>
- Future carbon tax?
- Future need to retrofit carbon capture and storage?

# NLWA MYTH 6: THE INCINERATOR PROMOTES THE 'CIRCULAR ECONOMY'

## The truth: Incineration is the greatest barrier to the circular economy

Professor Sir Iain Boyd, when Chief Scientific Advisor, to DEFRA:

'If there is one way of quickly extinguishing the value in a material, it is to stick it in an incinerator and burn it. It may give you energy out at the end of the day, but some of those materials, even if they are plastics, with a little ingenuity, can be given more positive value. **One thing that worries me is that we are taking these materials, we are putting them in incinerators, we are losing them forever and we are creating carbon dioxide out of them, which is not a great thing...** I think that incineration is not a good direction to go in.'

Instead, incineration:

- Drives continued materials and fossil fuel extraction
- Enables continued consumerism
- Enables business models that create private profit and socialized loss

*Source: Oral Evidence: The Work of Defra's Chief Scientific Adviser, HC 775 (EFRACOM, 21 January 2018)*

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**Securing a pause and review for the planned incinerator requires Labour party members to oppose the plan and call for a pause and review immediately:**

- Call on council leaders to pause and review- especially with regards to equalities, air pollution, community participation
- Hold Sadiq Khan to account- why has he called for a JR for a new incinerator in South London but ignoring the Edmonton rebuild?
- Put the pressure on NLWA board members, especially Chair Clyde Loakes up for re-election in September
- Secure motions against the incinerator at ward level- why are council leaders and the NLWA proceeding against the wishes of the grassroots LP membership?

More about incineration <https://ukwin.org.uk/>

More about our campaign <https://stop-edmonton-incinerator.org/> including Value for £ and climate change materials

Crowdfunding link: <https://www.crowdjustice.com/case/make-incineration-polluters-pay/>

Twitter @StopTheRebuild

Whatsapp group link <https://chat.whatsapp.com/lgvKlpAigHy3hOD3nT6SwO>