**London, 18 August 2021**

José Manuel Entrecanales Domecq
Chairman and CEO
ACCIONA
Avenida de Europa
18. Parque Empresarial
La Moraleja 28108
Alcobendas
Madrid, Spain
by post and by email to gabinetedeprensa@acciona.es, responsabilidadcorporativa@acciona.com, inversores@acciona.es, redessociales@acciona.com

Dear José Manuel Entrecanales,

I am writing to you on behalf of the undersigned groups—which represent the concerned public, political organisations, trade unions, environmental and social activists, doctors, political representatives, UK- and EU-based civil society organisations, and many others—to call on **ACCIONA to withdraw its bid to build a new energy-from-waste (EfW) facility in Edmonton**, north London, for the North London Waste Authority.

This urgent request reflects our support for ACCIONA's 'sustainable regeneration' ambitions for the climate, biodiversity, and the circular economy. Indeed, we commend you for your promotion of emission reduction targets and your efforts to reduce greenhouse gases by avoiding the use of virgin material and external fossil-based energy, prioritising resource reduction, and using renewable and recycled materials with a view to 'giving new life to waste'. These goals are vital to slowing climate and ecological system breakdown.

However, ACCIONA's active bid to build an EfW plant in Edmonton is at odds with these goals. The project undercuts 'sustainable regeneration', since EfW plants permanently destroy materials, releasing greenhouse gases and toxic emissions into the atmosphere, and perpetuating the extraction and use of virgin materials.

By pulling out of the bidding process, ACCIONA would not only protect its reputation as a leader in sustainable approaches, but also send an unmistakable signal to the waste and resource sectors of the UK and other countries, namely that the company is *serious* about its climate and ecological ambitions. The time to do so is now, given that the two other short-listed companies—CNIM and HZI, ACCIONA's project partner in Western Australia—have already withdrawn their bids.

As you may be aware, the EfW project faces strong, growing opposition in London and beyond. A London-wide Labour Party conference recently passed a motion for a pause and review of the incinerator plans (which has policy implications for six of the seven local councils in north London). The regional Trades Union Congress, which represents the majority of trade unions in the UK, also passed such a motion. In addition, London's mayor has agreed to meet with campaigners and cross-party politicians next month to discuss potential alternatives to the Edmonton incinerator. The successful bidder thus runs the risk of delays, cancellation, legal action, and reputational damage, as has been reported in the media.

While we trust you are familiar with the context-specific grounds for the opposition to the Edmonton incinerator project, we would be happy to send you information on the various concerns, including:

- **social injustice:** EfW plants in the UK are three times more likely to be sited in the most deprived areas, such as Edmonton, whose racially diverse population has experienced a Covid mortality rate that is 40% higher than the national average.[1] A growing body of scientific evidence links long-term exposure to air pollution with a greater risk of serious medical conditions and premature death, including from infectious diseases.

- **EfW overcapacity:** According to a recent assessment, EfW overcapacity will reach 15 million tonnes in England and 1.3 million tonnes in London by 2035.[2] The North London Waste Authority has not updated its waste projections since 2015, despite sustained calls for it to do so and evidence that total waste arisings are already 150,000 tonnes below projected levels. Resistance to the project increased when the mayor released his forecast that London faces a surplus of 950,000 tonnes of EfW capacity if recycling targets are met by 2030. The UK Department for Environment, Food and Rural Affairs' new waste assessment, due out in the coming months, is expected to lead to national and local remodelling, as well as contingency planning for dealing with stranded incineration assets.

- **incompatibility with the net-zero carbon target:** The most recent figures indicate that the UK's current EfW capacity will double by 2030, which is expected to lead to a tripling of greenhouse gas emissions from incineration, pushing the UK's 2035 net-zero pathway target out of reach.[3] The Edmonton incinerator, if built, would account for a significant proportion of these emissions. As you undoubtedly know, no financing has been secured for the incinerator to be equipped with carbon capture and storage technology, which remains prohibitively expensive and unproven at scale.

- **incompatibility with recycling targets and the circular economy:** Truly residual waste arisings are expected to fall in line with national measures that promote waste prevention, reuse and repair, and recycling, as part of the UK's transition to a circular economy. If the construction of a new incinerator in Edmonton goes ahead and residual waste trends continue, north London's councils will be contractually incentivised to send recyclables to incineration to keep the plant running at capacity, which would undermine the UK's 65% recycling target for 2035 as well as the transition to a more circular economy. Moreover, the local councils risk forgoing recycling revenue that would be secured through a genuine shift away from EfW incineration (and landfilling).

- **forgone green jobs:** In the UK, reuse and repair already generate 15 times more jobs than the waste disposal sector, whose expansion is preventing a green job boom. The Edmonton incinerator would provide a fraction of the jobs that could be secured for local residents if the councils pursued a green post-Covid recovery, in line with what ACCIONA might call sustainable regeneration principles.

This list is not exhaustive—it excludes concerns about the use of heat from EfW incineration despite the availability of significantly less carbon-intensive options,[4] as well as growing alarm over the health risks associated with toxic emissions, such as ultrafine particles, dioxins, and NOx.[5] Nor does the list cover the implications of a potential incineration tax, carbon charge, or ban on the burning of plastics for the viability of a new EfW incinerator. For more details, please feel free to contact us.

We hope you will take the time to rethink ACCIONA's strategy in north London and **immediately withdraw your bid to build a new EfW plant in Edmonton**. Your decision will have lasting consequences for the residents of Edmonton in particular, and the UK more broadly. It could also set a weighty precedent for other companies in the field, one that could help to align the sector with global climate imperatives and 'give new life to waste'.

We request that you **acknowledge receipt of this letter by emailing notoxicsmoke@gmail.com.** We would be grateful if you could write to the same email address to let us know, **by 6 September, whether you intend to proceed with or pull out of the tender** to build the new EfW facility in Edmonton, north London.

In the meantime, we remain at your disposal for a meeting and look forward to hearing from you.

Sincerely,

Carina Millstone
on behalf of

Black Lives Matter Enfield
Camden Civic Society
Climate Emergency Camden: Camden Air Action, Camden Cyclists, Camden Fairtrade Network, Camden for the CEE Bill, Camden Green Party, Canopy Coalition, Divest Camden, Friends of the Earth Camden, Hopscotch Women's Centre, Plastic Free West Hampstead, Power Up North London, Transition Towns Camden
Enfield Climate Action Forum (EnCaf)
Enfield People Before Profit
Enfield People's Theatre
Enfield Stand Up to Racism
Extinction Rebellion (XR): XR Barnet, XR Camden, XR Enfield, XR Hackney, XR Haringey, XR Islington, XR Waltham Forest, XR London, XR UK
Friends of the Earth
Global Alliance for Incinerator Alternatives (GAIA)
Greenpeace
Haringey Clean Air Group
Haringey Labour Climate Action (HLCA)
Islington Environmental Emergency Alliance
Islington North Environment Forum (no logo)
Palmers Green Community
Plastics Rebellion
Residents of Enfield Angel Communities Together (no logo)
Sky Rebellion
Stop the Edmonton Incinerator Now
Unite Community Enfield Area Branch
United Kingdom Without Incineration Network (UKWIN)
XR Drummers London
XR Unify
XR Zero Waste
Zero Carbon Campaign
Zero Waste Europe

[1] https://www.theguardian.com/environment/2020/jul/31/uk-waste-incinerators-three-times-more-likely-to-be-in-deprived-areas.
[2] https://www.xrzerowaste.uk/s/2021-07-16-XRZW-EfW-overcapacity-policy-brief.pdf.
[3] https://www.xrzerowaste.uk/s/2021-07-16-XRZW-EfW-overcapacity-policy-brief.pdf.
[4] https://www.telegraph.co.uk/business/2021/02/04/energy-waste-plants-face-scrutiny-carbon-emissions/.
[5] https://www.youtube.com/watch?v=KRFcXbbScAo.