



RESPONSE TO THE NORTH LONDON JOINT WASTE STRATEGY SURVEY

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The Stop the Edmonton Incinerator Now (StEIN) coalition welcomes the North London Waste Authority (NLWA) [survey](#) on residents' waste disposal priorities, entitled "Towards a Low Waste North London". The survey results are to inform the design of the new North London Joint Waste Strategy.

The StEIN coalition is issuing this survey response to ensure that decision-makers who are charged with accelerating the transition away from the linear economy do not overlook the two **key obstacles to a more circular economy in North London**—neither of which is explicitly mentioned in the survey—namely:

1. the construction of a **waste incinerator** in Edmonton, which threatens to lock residents into a socially unjust, carbon-intensive, uneconomic, take–make–waste system for decades to come
2. the failure to install an advanced **sorting facility** to extract plastics and other recyclables, including compostables, from the waste stream prior to incineration. Such a facility would allow NLWA to:
 - **slash CO2 emissions**, as material extraction drives down the amount of waste to be incinerated
 - **turbocharge recycling**, as extracted materials are fed into recycling streams, bringing national and municipal targets back within reach while accelerating the transition to a circular economy
 - **secure value for money**, as reducing residual waste dramatically lessens how much incineration capacity is required, boosting recycling grows income streams, and slashing CO2 emissions significantly cuts costs of incineration under the UK Emissions Trading Scheme.

These two obstacles have created a yawning gap between North London's approach to waste management, on the one hand, and municipal and national waste targets, on the other. The gap is reflected in North London's abysmal recycling rate, which has been *trending downwards* since 2015. NLWA recycled [28.4%](#) of our household waste in 2021/22 although the previous Joint Waste Strategy set targets of 45% by 2015 and 50% by 2020. The gap yawns even wider because North London lacks a coordinated reuse and repair strategy, although cities like Manchester have demonstrated what can be achieved when one is in place. The fact that NLWA has been operating without a waste strategy since the previous one expired in 2020 may partly explain why no progress has been made in achieving agreed targets.

The new Joint Waste Strategy must whip North London into shape. It needs to support NLWA in closing the gap while complying with the priorities highlighted in the survey, such as minimising the carbon impact of disposal. In particular, the Strategy must enable NLWA to meet—or at least strive for—established milestones on the transition path, including the national government's target of [halving residual waste by 2042](#) (compared to 2019) and the [London Environment Strategy target](#) of recycling 65% of it by 2030 (as reflected in the 2022 [North London Waste Plan](#)). Given the urgency behind these ambitious goals, the new Joint Waste Strategy must **commit NLWA to**:

- doing all it can to **reduce waste** and to manage the far smaller amount of waste at the **highest possible level of the waste hierarchy**
- *continuously and publicly* **updating** data on waste collected and recycled, **monitoring** progress against targets, and **adjusting** its waste management approach and forecasts in line with the evidence.

Such a Joint Waste Strategy is certain to identify the above-mentioned obstacles to a circular economy. It would no doubt demonstrate that NLWA can fulfil its vision in line with its stated principles only if it installs an advanced sorting facility and urgently reviews its decision to build a 700,000-tonne incinerator to treat an already insufficient, [rapidly shrinking feedstock](#), instead of sending North London's truly residual (non-recyclable) waste to commercial incinerators. A Strategy that aims to halve residual waste, achieve recycling targets, and minimise CO2 emissions can leave no space for an "I've started, so I'll finish" approach.

The following sections broadly respond to the NLWA survey's seven questions (Q1–Q7), presenting details that decision-makers should consider in drafting the new North London Joint Waste Strategy and in developing policies and activities designed to accelerate the shift towards a circular economy.

1. Top priority for the Joint Waste Strategy: minimising the carbon impact by installing an advanced sorting facility to extract recyclables from the incineration waste stream (Q1)
2. Residents' views on implementing the waste hierarchy (Q2, Q4, Q5)
3. Actions from the national government (Q3)
4. Urgently needed NLWA actions to tackle the climate and ecological crisis (Q6)
5. Recommendations for the North London Joint Waste Strategy (Q7)

1. Top priority for the Joint Waste Strategy: minimising the carbon impact by installing an advanced sorting facility to extract recyclables from the incineration waste stream (Q1)

- 1.1 A 2022 [reloop](#) report warns that “burning fossil-derived carbon in incineration plants is unsustainable in a world that needs to rapidly decarbonise”. It goes on to say that if cities that incinerate waste “are serious about committing to ‘net zero’” and reducing greenhouse gas emissions from incineration, they must focus on minimising the amount of plastic that is incinerated and maximising what is recycled. The single most cost-effective way to do is to implement an advanced (mixed-waste) sorting facility, as the consultancy Eunomia demonstrates in its recent [report](#) for the Scottish Government, *Opportunities to Decarbonise the Waste Treatment Infrastructure*. Expert estimates such as those of [reloop](#) indicate that at least **4–5 tonnes of CO2 can be saved for every tonne of plastic waste that is extracted** from the incineration stream and fed into a recycling stream. Since [55% to 85%](#) of the waste in North London’s incineration stream could be recycled, a sorting facility would dramatically reduce NLWA’s greenhouse gas emissions. Extracting materials for recycling saves emissions not only by averting incineration, but also by obviating the need for the extraction, transport, and processing of raw materials.
- 1.2 Advanced sorting facilities are designed to extract plastics and other recyclables—including inflammable vapes, batteries, and biogenic materials such as food waste—from the waste stream prior to incineration, to ensure that only **truly residual waste** (waste that cannot be recycled) is combusted. Since more than half of the materials NLWA currently burns could be recycled, such extraction could reduce the amount of waste to be treated in North London by more than half.
- 1.3 In addition to slashing greenhouse gas emissions, installing an advanced sorting facility would secure **financial benefits**, for example by:
- dramatically reducing the incineration capacity required to treat a much smaller amount of (truly) residual waste, which would drive down the cost of building a new incinerator in Edmonton (since it would be scaled down accordingly) or of sending the waste to available commercial incinerators for treatment
 - increasing income streams by boosting recycling
 - cutting the allowance liability under the UK Emissions Trading Scheme (ETS), saving North Londoners at least £25–£30 per tonne of waste once the ETS kicks in for waste incineration in 2028
 - avoiding the far greater financial risks associated with a reliance on carbon capture and storage (CCS), which remains unproven at scale and which NLWA’s own CCS strategy [report](#) recognises would not be available before 2035, if at all.
- 1.4 Installing an advanced sorting facility is in line with national **regulations** that require waste management organisations to take all reasonable steps to apply the “waste hierarchy”, which very clearly puts prevention and recycling ahead of energy-from-waste incineration. In North London, the installation of such a facility would be in line with the recommendations of the [previous Joint Waste Strategy](#) (point 7.B1) in terms of fulfilling “collective recycling and composting targets”. To date, however, the waste authority does not seem to have taken this guidance on board.
- 1.5 NLWA Managing Director Martin Capstick has indicated a desire to **commission a study** on installing an advanced sorting facility. On 20 February 2023, during a [meeting](#) of Islington Council’s Environment and Regeneration Scrutiny Committee, he responded to a question about commissioning independent research on the possible implementation of an advanced sorting facility by stating that he was “very keen to get a piece of work to give us [NLWA] an authoritative view”. Did NLWA commission such a study? If not, why not? If so, has the report been made public? If not, when will it be made public and when will NLWA update the public on its decision-making regarding the installation of a sorting facility?

2. Residents' views on implementing the waste hierarchy (Q2, Q4, Q5)

2.1 The NLWA survey asks residents to rank, in order of importance, critical measures that the national government is already taking, implying that some actions may preclude, or that they should be prioritised over, others. In the spirit of collaboration with NLWA, the StEIN coalition hereby draws attention to the more comprehensive North London Zero Waste “Let’s Talk Rubbish” survey, which was completed in May 2022 and yielded a set of recommendations for North London councils:

<https://www.letstalkrubbish.london>

3. Actions from the national government (Q3)

3.1 NLWA can support a transition to a more circular economy by encouraging the national government to take various actions, including by calling on it to:

3.1.1 Implement the [10-point action plan](#) presented to Prime Minister Rishi Sunak on 24 April 2023. Among the actions called for in this plan is an immediate moratorium on additional EfW capacity, in line with the “[priority recommendation](#)” of the Climate Change Committee.

3.1.2 Clarify its position on **carbon capture and storage (CCS)**:

- *either* by setting the record straight that CCS is a false solution for reducing emissions from waste incineration and transitioning towards a circular economy, since it:
 - cannot be deployed in time to avoid catastrophic environmental impacts
 - would only prop up business as usual, given that energy-from-waste incineration perpetuates the linear economy
 - is not economically viable and would deprive communities of financing needed for renewables and the transition to a more circular economy
 - would require additional energy to operate at a time when energy demand urgently needs to be reduced
- *or* by committing to CCS despite evidence-based warnings, in particular by:
 - restricting new development consent orders exclusively to waste incinerators built with functioning CCS from the start of operation, and
 - requiring installment of CCS on all permitted and existing plants by 2030.

3.1.3 Clamp down on the waste sector’s [misrepresentation](#) of energy-from-waste incineration as “green”, “renewable”, “sustainable”, and “low-carbon”, as such **greenwashing** represents an obstacle to the phase-out of unnecessary burning of plastics and other recyclables.

3.1.4 Reform the **landfill tax** at the national level to support the implementation of material recovery and biological treatment (MRBT) to landfill. At the moment, landfilling waste is not an option in the UK on cost grounds, although MBRT would prevent landfilled food waste and other biogenic material—both collected and extracted through advanced sorting—from emitting methane. Indeed, as Zero Waste Scotland shows, one tonne of biostabilised waste emits [20 times less CO2](#) than sending that same waste to incineration. A recent Zero Waste Europe [report](#) provides related details on common carbon accounting errors around waste disposal.

3.1.5 Exclude **heat from incineration** in UK heat network incentives and plans, such as the [Heat Networks Delivery Unit](#) scheme, in favour of communal heat schemes from low-carbon heat and schemes that also are able to provide cooling, which will become increasingly critical.

3.1.6 Publish, as a matter of urgency, the long-delayed official waste generation and waste management capacity **data and forecasts**, taking into account planning for consistency in collection, extended producer responsibility, and deposit return schemes.

4. Urgently needed NLWA actions to tackle the climate and ecological crisis (Q6)

- 4.1 Install an advanced sorting facility.
- 4.2 Review the plans to build a new incinerator based on updated and corrected data.
- 4.3 Stop misleading the public and politicians about the **carbon footprint** of the Edmonton incinerator and instead make available revised emissions figures after correcting the [identified errors](#), namely a methodological flaw in the way landfill was assessed and a failure to update a 2013 figure for the avoided carbon intensity associated with power generation.
- 4.4 Similarly, stop misleading the public and politicians by saying that the greenhouse gas emissions associated with sending North London’s residual waste to landfill would be worse than the emissions caused by sending it to incineration in Edmonton. The opposite is demonstrably true: the **net emissions from incineration will be double those of landfill** at the start of the Edmonton incinerator’s operation and about 3.7 times worse by the time the facility nears the end of its life, as highlighted in a publicly available [assessment](#) by Eunomia founder Dr Dominic Hogg.
- 4.5 Stop misleading the public and politicians by saying that landfill is the **only alternative** to a new incinerator although NLWA’s own reports identify available commercial incineration capacity as the alternative. Indeed, NLWA’s own “alternative waste disposal methods” scenario assumes that if the Edmonton incinerator were not built, “instead all waste was treated at a third-party facility, assuming that sufficient capacity could be secured. In this scenario, the EcoPark South recycling facilities are still completed, and the existing EfW [energy-from-waste] facility ceases operation in 2026 and is then demolished and the site remediated” ([para. 7.8](#)). NLWA goes on to say that that the main feasible alternative to the new incinerator would involve a long-term contract for “400,000 tonnes of residual waste” ([para. 7.9](#)).
- 4.6 Develop **financial and risk plans** in response to significant environmental, socioeconomic, and regulatory changes since 2015, when NLWA applied for a development consent order for the Edmonton incinerator. Such plans need to consider multiple relevant factors, including:
 - the imminent inclusion of energy-from-waste incineration in the UK Emissions Trading Scheme
 - the impact of Brexit and Russia’s war in Ukraine on interest rates and price volatility
 - the UK’s net zero target
 - the climate and ecological emergency declarations of all North London councils
 - the Climate Change Committee’s net-zero pathway, which requires the waste sector to commit to a “[step-change towards a circular economy](#)” by cutting its CO2 emissions to [below 16 million tonnes by 2035](#) (feasible only if the proportion of plastic in residual waste is reduced to at most 10% and the recycling rate is increased to 65%), thereby enabling the UK to meet its net zero target by 2050—in stark contrast to the recent [NLWA waste reduction programme](#) aimed at decreasing arisings by 10,000 tonnes and “growing our efforts *incrementally*” (emphasis added)
 - the national government’s efforts to halve municipal waste by 2042 and to implement consistent collections, deposit return schemes, and extended producer responsibilities
 - the London Environment Strategy, which calls for 65% recycling of municipal waste by 2035
 - the public [warning](#) issued by Waltham Forest’s strategic director of finance and delivery, John Turnbull, who in early 2023 identified the potential loss of control over incinerator construction costs as the “biggest risk”

- repeated hikes in the price of the North London Heat and Power Project, which most recently jumped to [£1.42–£1.52 billion](#) from £1.2 billion
 - the costs of treating North London’s truly residual waste in accessible commercial incinerators
 - Mayor Sadiq Khan’s [conclusion](#) that London will have excess incineration capacity even if the 700,000-tonne Edmonton plant is *not* built: 250,000 tonnes excess capacity if the plant is *not* built, 950,000 tonnes excess capacity if it *is* built
 - the urgent need to stop entrenching environmental racism in Edmonton, one of the UK’s most deprived areas, whose Black and Brown communities, in particular, would significantly benefit from a decision to cancel the planned construction of the new waste incinerator
 - the circular economy as a vital economic multiplier and important source of local [employment](#), particularly in contrast to the low-employment incineration sector
 - the prevalence of inflammable “disposable” vapes
 - the cost of securing near-zero transport emissions through the acquisition or retrofitting of waste management lorries, as offered by [Refuse Vehicle Solutions](#)
 - the transition to low-carbon cooling, rather than high-carbon heating, for North Londoners
 - the financial impact of partially or completely decommissioning the Edmonton incinerator due to insufficient feedstock
 - the financial impact of halting construction of the Edmonton incinerator immediately or at different points in the future.
- 4.7 Abandon the carbon-intensive, highly disruptive construction of infrastructure for the transfer of waste heat from the Edmonton incinerator to **heat networks** in Haringey and Enfield. These networks would be far less carbon-intensive if the buildings were properly insulated and if they relied on the fast-decarbonising national grid for heating and—crucially—cooling.

5. Recommendations for the North London Joint Waste Strategy (Q7)

- 5.1 Ensure that the Joint Waste Strategy is incorporated into a **broader circular economy strategy** that identifies and respects planetary boundaries for resource consumption, as described in the *Circularity Gap Report 2023*.
- 5.2 Formulate a **vision that enables waste reduction as well as the application of the waste hierarchy**, for example along the following lines: “To seek to minimise the amount of waste requiring management and then manage it at the highest possible level of the waste hierarchy.”
- 5.3 Develop a **detailed strategy, including a roadmap** with targets and interim targets to be reached within defined time periods (Brighton & Hove’s strategy could be emulated), laying out precisely how NLWA will:
- meet the strategic objectives of the 2022 [North London Waste Plan](#), including on moving North London’s waste as far **up the waste hierarchy** as possible and providing opportunities for North London to help develop a **low-carbon economy** and low-carbon decentralised energy
 - increase the **recycling rate** for municipal waste from 28.4% in 2021/22 to 65% by 2030, as per the North London Waste Plan, including in relation to actual and forecast population figures (which have not increased in line with NLWA projections), economic trends, and technology, such as the

above-mentioned advanced sorting facility, which would significantly lower the amount of municipal waste that is sent for incineration in Edmonton, while increasing the recycling rate (see the next point)

- once an advanced sorting facility has been installed, **report** on collected (and not rejected) recycling, as well as on recyclable materials extracted by the facility—in line with specifications in Defra’s national statistics [notice](#) of 15 December 2021
- deliver on the national target of **halving municipal waste** by 2042 (as compared to 2019), including in relation to national regulations on consistency in waste collection, deposit return schemes, and extended producer responsibilities
- reduce **greenhouse gas emissions**, for example by installing an advanced sorting facility to extract plastics, biogenic waste, batteries, and other recyclables from the incineration waste stream, as noted above
- reduce the volume and quantities of **air and water pollutants** released through waste incineration, particularly the *number* of ultrafine particulates, which are among the most toxic to human health, especially among Edmonton residents
- minimise **financial risks** to North London residents, including by doing everything possible to avert situations in which:
 - the costs of treating truly residual waste in Edmonton exceed costs associated with sending it to accessible commercial plants
 - the Edmonton incinerator can no longer operate at full capacity unless waste is imported from outside North London, undermining the net self-sufficiency goal of the North London Waste Plan
 - contracts between NLWA and heat suppliers and between the heat suppliers and residents cause residents to pay more for heat than they would by using alternative technologies
 - the Edmonton plant must be partially or entirely shut down due to insufficient feedstock, leaving North Londoners to pay for a useless white elephant and jeopardising the heat and hot water supply of residents whose heat networks depend on the Edmonton incinerator
 - construction on the Edmonton plant must be stopped or the incinerator itself decommissioned in response to government decisions to shut down carbon-intensive infrastructure, such as energy-from-waste incinerators.

5.4 *Continuously* **update** data on waste collected and recycled, **monitor** progress against targets, and **adjust** the waste management approach and forecasts in line with evidence updates.

5.5 Integrate **enforcement mechanisms** and compliance promotion into the strategy to encourage its implementation.

5.6 Carry out an **annual review** of the strategy, as required by the previous Joint Waste Strategy, but with requirements for the **inclusion of diverse stakeholders** in the strategy development, as well as transparency measures to allow residents and businesses to access information on emerging issues and outcomes.

5.7 Continually develop and prepare for the next **Joint Waste Strategy** to prevent NLWA from operating without a strategy in place, as it has done since 2020.

5.8 Use more environmentally friendly methods for treating and disposing of truly residual waste (less than 25% of what is considered residual now), as explored in Zero Waste Europe [reports](#) on **MRBT** to landfill, as well as Ricardo’s [report](#) for Zero Waste Scotland on the viability of implementing MRBT in Scotland.

5.9 Undertake and publish ongoing **calculations of the climate impact** of incineration, preferably using UKWIN’s [guide](#), and including the emissions from incineration of biogenic material.

- 5.10 Expand **reuse and repair** through the establishment of a network of permanent, fully funded, easy-to-access warehouses and shops, for example based on the progress made in Manchester, where waste contractor Suez is helping to set up repair and reuse hubs around the city.
- 5.11 Plan a fully funded rolling programme with the education sector to encourage **behaviour change** in consumption patterns, possibly beginning with food and textiles.
- 5.12 Collaborate with universities on **zero waste warehouses for students**, to enable graduating students to pass on furnishings and white goods to the next generation of students.
- 5.13 Offer **zero waste programmes and certification** for a range of sectors, including education, care, hospitals, and hospitality.
- 5.14 Develop, together with academic partners, free-to-use **resource flow mapping tools** that everyone, but especially businesses, can use to track used resources to their ultimate destinations, with the aim of enabling reuse.
- 5.15 Introduce **transparency measures** to allow the public to track developments on a continuously updated online platform, including, but not limited to:
- progress against set Joint Waste Strategy targets and interim targets, such as those related to recycling and waste reduction
 - greenhouse gas emissions, both fossil-based and biogenic
 - pollutants (including ultrafine particulate matter), also during abnormal operations, such as shutdowns and start-ups
 - breaches of statutory environmental limits and efforts to minimise the risk of their recurrence
 - waste processing data, including tonnes of residual waste sent for incineration per month (as a proportion of incineration capacity) and the make-up of the incinerated materials (as percentages of the whole)
 - the roll-out of reuse and repair centres per borough and across North London, with data on employment, use by residents, tonnages of materials and products fed into reuse and repair streams, and updates on trends and lessons learned
 - progress on meeting the strategic objectives of the North London Waste Plan.

We gratefully acknowledge the support of UKWIN (United Kingdom Without Incineration Network, ukwin.org.uk). More sources and details are available upon request.

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Relevant links

- NLWA’s “Towards a Low Waste North London” survey: <https://northlondonwaste.commonplace.is/en-GB/proposals/nljwssurvey/step1>
- This document (StEIN’s response to NLWA’s “Towards a Low Waste North London” survey): <https://stop-edmonton-incinerator.org/stein-response-to-the-north-london-joint-waste-strategy-survey/>
- StEIN’s press release regarding this survey response: <https://stop-edmonton-incinerator.org/press-release-low-waste-survey-obscures-key-obstacles-to-circular-economy/>
- Previous StEIN documents:
 - “Legal action challenges government funding for Haringey heat networks using incinerated waste”: <https://stop-edmonton-incinerator.org/wp-content/uploads/2022/09/2022-09-22-Press-release-Heat-Scheme.pdf>
 - “Campaigners issue litany of concerns to aid Gove investigation of NLWA”: <https://stop-edmonton-incinerator.org/wp-content/uploads/2022/06/2022-06-16-Campaigners-expect-Gove-investigators-to-scrutinize-concerns-about-NLWA.pdf>
 - “Edmonton incinerator data ‘grossly misleading’ or sign of ignorance”: <https://stop-edmonton-incinerator.org/wp-content/uploads/2022/04/2022-04-19-worse-than-landfill-press-release-2.pdf>
- Dr Rembrandt Koppelaar, “Waste Prevention and Recycling as the way forward instead of rebuilding the Edmonton incinerator”: https://www.xrzerowaste.uk/s/Poster_North_London_Alternative_plan_recycling_instead_of_incineration.pdf
- Dr Dominic Hogg, *The case for sorting recyclables prior to landfill and incineration*, reloop: https://www.reloopplatform.org/wp-content/uploads/2022/06/D-HOGG-Reloop_FINAL_June2022-1.pdf