

NORTH LONDON XR ALLIANCE ISSUES REBUTTAL TO NLWA GROUP CALLS ON WASTE AUTHORITY TO **TELL THE TRUTH ABOUT INCINERATION**

LONDON, 26 MAY 2020—The seven North London Extinction Rebellion (XR) groups today released a 20-page refutation of claims made by the North London Waste Authority (NLWA) regarding plans for a new incinerator in Edmonton (see <https://stop-edmonton-incinerator.org/extinction-rebellion-rebuttal/>).

The rebuttal calls on the NLWA to tell the truth about recycling, waste generation, carbon emissions, waste management needs, and the health and environmental costs of incineration, such as the emission of ultra-fine particulate matter. It also identifies serious flaws in the original plans, which were drawn up under circumstances that no longer apply. Since then, the Court of Appeal ruled Heathrow's expansion illegal because ministers did not adequately take account of the UK government's climate-related commitments. Moreover, scientific studies now highlight the association between air pollution and increased vulnerability to infectious diseases such as Covid-19.

Most of the heavily annotated document focuses on challenging questionable claims made by the long-time NLWA chair, Cllr Clyde Loakes of Waltham Forest, in a letter dated 21 April 2020, and by Hackney Cllr Jon Burke, in a *Hackney Citizen* article of 11 March 2020. XR finds that the councillors' statements reveal that the NLWA still is not taking recycling or climate breakdown seriously. In particular, the rebuttal underscores the following points:

RECYCLING AND WASTE GENERATION

- Of the 580,000 tonnes of waste that are incinerated every year, 55%–85% could be recycled or composted. This means that the NLWA is burning at least 320,000 tonnes of recyclable and compostable waste every year.
- The NLWA has consistently failed to meet national and city recycling targets by a significant margin although it has a statutory duty to “have regard” to national and city strategies. Recycling and composting rates have been decreasing for more than five years—from 33% in 2013/14 to 30% in 2018/19—despite targets of 45% by 2015 and 50% by 2020. Between 2014/15 and 2018/19, the amounts of waste that were recycled and composted decreased by 6% and 14%, respectively.
- Between 2014 and 2019, the NLWA spent nearly five times more on the new incinerator (£11.8 million) than on promoting recycling and waste prevention (£2.5 million).
- The NLWA predicted an increase in the total generation of waste for North London, but the amount has been declining since 2015/16. By 2018/19, the seven boroughs were producing about 150,000 tonnes less waste than predicted and, accordingly, 75,000 tonnes less “residual” waste (waste that cannot be recycled or composted).
- Despite decreasing waste generation and the fact that most of North London's waste could be recycled or composted, the planned incinerator's operational capacity—700,000 tonnes—is 30% greater than that of the current incinerator. That unjustifiable overcapacity exposes residents to the risk of carbon-intensive waste shipping from outside the seven boroughs. It also lock councils and communities into a system that requires a certain amount of waste to burn each year, which may act as a disincentive to improving recycling rates.
- National environmental protection regulations require organisations that handle waste to take all reasonable steps to apply the waste hierarchy, which very clearly puts prevention and recycling ahead of energy-from-waste.

PUBLIC ENGAGEMENT

- The NLWA conducted a public consultation on the project in 2014–15, in only two of the seven boroughs.
- During the limited public consultation, the NLWA failed to inform residents that the facility would burn business waste and waste from outside of North London.

CARBON EMISSIONS AND CARBON INTENSITY

- To date, the NLWA has avoided citing total projected carbon emissions of the planned incinerator. It has also refrained from explicitly disputing XR's figure of 700,000 tonnes of CO₂ per year. Instead, the NLWA uses questionable accounting and undefined expressions such as "climate impact", which create the impression that the incinerator will secure a "carbon saving" and release only 28,000 tonnes—rather than 700,000 tonnes—of CO₂ per year. In its rebuttal, XR provides a step-by-step breakdown of the NLWA's misleading carbon calculations.
- The fossil carbon intensity of incineration is more than twice that of energy produced by combined cycle gas turbines, and only slightly less than that of energy generated by burning coal. Since plastics—more than 99% of which are made from fossil fuels—account for about 50% of the calorific value of the Edmonton incinerator's feedstock, its fossil carbon intensity is correspondingly high.
- The UK currently draws 40% of its grid electricity from renewable sources such as offshore wind—significantly more than five years ago, when plans were drawn up for the new incinerator. As a result, heat pumps have become a substantially lower-carbon solution than incineration-based domestic heating systems.

AIR QUALITY AND HEALTH RISKS

- Incinerator filters appear to be relatively effective at removing some particulate matter (PM), namely PM_{2.5} and PM₁₀, but the opposite is true of ultra-fine particles, such as PM_{0.1} and PM₁, which are particularly hazardous to human health, especially in communities around incinerators, but are "too small to be filtered and are thus emitted directly into the air that we breathe". Scientific research show that "over 90% of the emitted particles are ultra-fine particles" and analysis of fibre filter retention has revealed "filter efficiency as low as 5%, compared to 100% for particle sizes [greater than] 1 micron". Studies have consistently demonstrated links between PM exposure and adverse health outcomes, including increased rates of respiratory and cardiovascular illness, hospitalisations, and premature mortality.
- Whereas other routes of waste disposal and energy generation are taxed and thus go some way to compensate for the public health costs arising from CO₂ emissions, the unpaid public health costs associated with fossil CO₂ from incineration must ultimately be picked up by the taxpayer.

The rebuttal complements a letter that the XR alliance sent to more than 400 North London councillors on 11 March 2020. In the letter, XR calls on the seven NLWA councils to pause and review the incinerator project in view of environmental, financial, and governance concerns. The letter also proposes proven alternative solutions to incineration that are more in line with the UK's circular-economy policy objectives. The letter is available at <https://stop-edmonton-incinerator.org/extinction-rebellion-letter/>.

XR's messages are reinforced by a new study by the UK Without Incineration Network (UKWIN), undertaken at the request of a group of local residents with financial support from the Frederick Mulder Foundation. The report makes recommendations for a value for money review of the NLWA's incinerator plans based on concerns that assessments to date have insufficiently addressed the project's financial risks. It is available at: <https://ukwin.org.uk/vfm>.

To minimise the negative impacts of waste disposal, efforts are urgently needed to: reduce waste, recycle more of the waste that is generated (the current 30% is significantly below the mandated 50%), and manage the smaller quantity of residual waste in a more responsible manner. To achieve those aims, XR asks councillors to pause and review the plans for a new incinerator in Edmonton, taking account of recent data, the current legal and policy context, and circular economy objectives, as well as Mayor Sadiq Khan's call for a judicial review of the decision to allow a second incinerator to be built at Belvedere. The current incinerator in Edmonton is operational until 2027, so there is time for a rethink, as long as procurement and preparatory works are put on hold.

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