



## Step-by-step suggestions for responding to NLWA's 'Towards a Low Waste North London' survey

25 August 2023

This document is designed to inform and assist respondents who are filling out the North London Waste Authority (NLWA) survey entitled 'Towards a Low Waste North London'. The survey is open until 15 September 2023 and is available at <https://northlondonwaste.commonplace.is/en-GB/proposals/nljwssurvey/step1>.

The more responses NLWA receives, the greater the likelihood that the new North London Joint Waste Strategy will reflect North Londoners' priorities. The Stop the Edmonton Incinerator Now (StEIN) coalition encourages everyone in North London to fill out the survey.

Respondents can adapt StEIN's notes and suggestions as they see fit. Some may opt to submit short, high-level answers to selected questions. Others may wish to refer NLWA to StEIN's comprehensive response, available at <https://stop-edmonton-incinerator.org/stein-response-to-the-north-london-joint-waste-strategy-survey/>. The survey's open-ended questions allow respondents to share individual views and aspirations.

Below are the extracted survey text and questions (in black), followed by StEIN's notes and suggestions (in blue).

### Key

Black text: direct quotes from the NLWA survey

Blue text: StEIN's notes and suggestions, which respondents can refer to when answering the survey questions

## The NLWA survey with some comments from StEIN

NLWA and the seven boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington, and Waltham Forest are developing a new Joint Waste Strategy. This will provide the framework for waste management in north London up to 2040.

**Take part in our short survey to help shape a cleaner, greener and more sustainable future.**

### Context

**We are in a climate emergency.** We need to take urgent action to meet the challenge.

All seven of our constituent boroughs (Barnet, Camden, Enfield Hackney, Haringey, Islington and Waltham Forest), as well as the Mayor of London and the UK Parliament, have declared a climate emergency. Declaring a climate emergency acknowledges the existential threat of global warming to humanity as well as the planet and demands significant action in response. [As currently planned, however, the Edmonton incinerator would \*\*add to\*\* global warming. That much is clear from a growing body of research, including reloop's 'The case for sorting recycling prior to landfill and incineration'.](#)

We know that north Londoners support this ambition and rank the climate emergency as a top concern. It is the most important problem of our times and not something that can be kicked into the long grass. As part of this effort, we are developing an ambitious new Joint Waste Strategy to support the reduction of waste in north London. [Committing to a new waste incinerator that is expected to be operational for multiple decades \*\*is\*\* kicking climate action into the long grass.](#)

### **About us**

North London Waste Authority and the seven boroughs play an important part in addressing the climate change challenge on behalf of two million Londoners.

Reducing waste is a team effort including the government, manufacturers, retailers, consumers, and of course the Councils & NLWA are involved. Government must lead the way through the introduction of legislation in collaboration with these other groups. [While NLWA does say it supports the Government's promised waste reduction policies, the sizing of the new Edmonton incinerator is based on assumptions that Government action will \*\*not\*\* reduce the volumes to be burnt.](#)

We have a clear ambition to deliver a cleaner, greener and more sustainable future for north London. [NLWA completely undermines this ambition by failing to install a sorting facility to extract recyclables \(including compostables such as food and garden waste\) from the waste stream before incineration. By burning these recyclables, the Edmonton incinerator releases avoidable carbon emissions and toxins, including endocrine-disrupting ultra-fine particulates.](#)

### **This is underpinned by four priorities:**

- To support the reduction in household waste. [As noted above, NLWA says it supports Government waste reduction policies, but in practice it bases the capacity of the new incinerator on \*\*increased\*\* waste—instead of increased recycling and reduced residual \(non-recyclable\) waste.](#)
- To promote repairing, reusing and recycling where reduction isn't possible. [While NLWA does have some programmes around repair, reuse and recycling, the transition to a low-waste economy requires a far more extensive approach, especially if North London's recycling rate is to meet municipal and national targets. In 2021/22, a mere 28.4% of North London's household waste was recycled although the previous Joint Waste Strategy set targets of 45% by 2015 and 50% by 2020. For more details, see the StEIN response \(especially Section 5\).](#)

- To reduce the environmental impact of disposal where there is no option to reuse or recycle. The key way to ‘reduce the environmental impact of disposal’ is to ensure that only truly non-recyclable waste is incinerated. Meeting this priority requires a concerted effort, as more than half of the waste that NLWA is currently burning could be recycled.
- To deliver collaborative, community-focused services which provide value for money, maximise social value and minimise carbon impact.
  - **Provide value for money?** NLWA is taking an uneconomic approach by locking north Londoners into a £1.5 billion ‘heat and power’ project for decades to come, even though Mayor Sadiq Khan has shown that London has more than enough waste incineration capacity without an incinerator in Edmonton.
  - **Maximise social value?** NLWA is undermining this aim by building an unnecessary incinerator in a heavily populated, disadvantaged area. In so doing, it’s selecting a low-employment path instead of transitioning to a more circular economy in which materials would be used longer and the reuse and repair job sector would be allowed to boom.
  - **Minimise carbon impact?** NLWA has yet to commit to extracting recyclables from the waste heading for incineration. Doing so would significantly reduce CO2 emissions.

### **The Joint Waste Strategy**

Our work is underpinned by a Joint Waste Strategy (JWS), which sets our vision for achieving these responsibilities. The last JWS was published in 2004 and is now out of date, having expired in 2020.

We are therefore producing a new JWS, fit for the future, with the main goal of promoting the principles of reduce, reuse and recycle as part of a circular economy.

To do this, we will talk and listen with partners, residents, community groups and local businesses to develop a new JWS.

Have your say

#### **Our public engagement is split into two phases:**

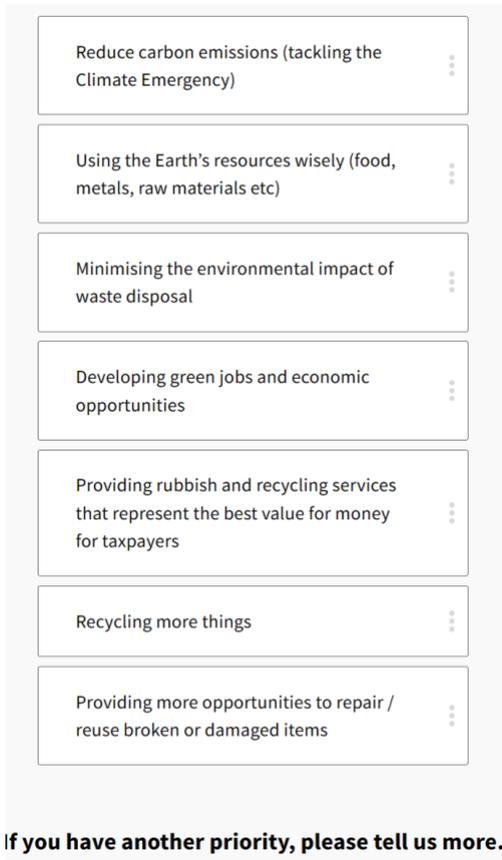
- **Summer 2023:** Set out and seek feedback on our vision and priorities
- **Early 2024:** Provide and gain feedback on the draft Joint Waste Strategy

This engagement will offer people the opportunity to co-design our strategy. It will be done in stages, first listening to understand local priorities and aspirations before seeking feedback on a draft strategy, informed by these priorities and aspirations.

We will be hosting pop-up events in each of our seven constituent boroughs this summer to discuss our vision and hear your thoughts. Look out for us in your area and take part in our short survey below. [To be meaningful, NLWA ‘pop-up events’ should actively include—and respond to—environmental and social justice groups, as well as individuals with waste knowledge.](#)

## The NLWA survey questions with notes and suggestions from StEIN

**Q1 In thinking about a new waste strategy, please drag and drop each option below to rank them by order of importance to you (top being the most important and bottom being the least important).**



Reduce carbon emissions (tackling the Climate Emergency)

Using the Earth's resources wisely (food, metals, raw materials etc)

Minimising the environmental impact of waste disposal

Developing green jobs and economic opportunities

Providing rubbish and recycling services that represent the best value for money for taxpayers

Recycling more things

Providing more opportunities to repair / reuse broken or damaged items

**If you have another priority, please tell us more.**

Installing an advanced mixed-waste sorting facility in Edmonton to extract recyclables from the incineration stream is a priority because:

- at least 4–5 tonnes of CO<sub>2</sub> can be saved for every tonne of plastic waste that is extracted from the incineration stream and fed into a recycling stream, as demonstrated by expert analysis, including by [reloop](#)
- 55% to 85% of the waste in North London's incineration stream could be recycled
- extracting materials for recycling saves carbon emissions not only by averting incineration, but also by obviating the need for the extraction, transport, and processing of raw materials.

**Q2. We have a vision to help deliver a cleaner, greener and more sustainable future for north London. How important are each of the following to you?**

Q2, Q4 and Q5 relate to the ‘waste hierarchy’. Government [guidance](#) on applying the waste hierarchy requires waste authorities to prioritise waste management approaches in this order:

- Prevention
- Preparing for re-use
- Recycling
- Other Recovery
- Disposal

It is not clear why survey respondents are being asked to rank the ‘four priorities’ or how responses to this question will affect the design of the new Joint Waste Strategy. NLWA already has some programmes for the first two categories ([Reduce, Reuse, Recycle](#)); its chosen disposal method for the third is far from environmentally friendly; and the fourth depends on how NLWA defines ‘good value for money’. See additional notes on the priorities above.

	Not important at all	Not important	Unsure	Somewhat important	Very important
To support the reduction of household waste	<input type="radio"/>				
To promote repairing, reusing and recycling where reduction isn't possible	<input type="radio"/>				
To use environmentally friendly disposal methods where there is no option to reuse or recycle	<input type="radio"/>				
To provide resident-focused services which are good value for money	<input type="radio"/>				

**For the new waste strategy to have the most impact it relies on the support of Government, businesses, residents and councils and NLWA.** Survey respondents could usefully call on NLWA to be transparent about how it engages with all stakeholders to ensure the Strategy will be able to deliver on its objectives.

**Q3. What actions from National Government would help us to support a more circular economy (where less waste is produced and raw materials are used) in north London? Select the three most important actions.**

It is unclear why respondents are being asked to rank these Government actions and how the responses might inform the Joint Waste Strategy.

In November 2021, Parliament passed the Environment Act, which sets a legislative waste reduction target that requires a 50% drop in the amount of disposed residual waste per person in England by the end of 2042, compared to 2019 levels (excluding major mineral waste). Three key waste reduction regulations are to help achieve this target: packaging requirements (known as ‘extended producer responsibility’ or EPR), deposit return schemes (DRS) and consistency in collections. As the National Audit Office [reports](#), however, the Department for Environment, Food & Rural Affairs has delayed all three reforms, which means that many tonnes of plastic, metal and food will be sent for incineration longer than initially envisioned.



Legislating to ban products which cannot easily be recycled



Legislating to ensure more products are recyclable



Providing more funding for circular economy schemes (e.g. reduce, reuse, recycle) at a local level



Giving councils the powers to enforce recycling and reuse



Introducing a deposit return scheme for drinks containers so that more things get recycled and there is less littering



Introduce a scheme where manufacturers are responsible for the costs of the collection and disposal of the things they sell (including dealing with littering of their products)



Launch a national campaign to encourage reduce; reuse; recycle

## If you have any other actions to suggest, please tell us more

Government delays in the delivery of waste reduction measures only heighten the urgency of local action in North London. NLWA can make a difference by: 1) reassessing the viability of the planned 700,000-tonne Edmonton incinerator in view of the most recent waste and incineration capacity data; and 2) installing a sorting facility to extract recyclables from the incineration waste stream in Edmonton, regardless of whether a new incinerator is built.

NLWA could also support the [10-point action plan to phase out waste incineration and accelerate the transition to zero waste](#), which was submitted to Prime Minister Rishi Sunak in April 2023 by a coalition including Greenpeace and the UK Without Incineration Network.

## Q4 What more do you think businesses – both manufacturers and retailers – could do? Select the three most important.

		
Produce only packaging that is recyclable	Minimise packaging	Contribute to running local repair / re-use facilities
		
Design items to last and able to be repaired	Provide loose (unpacked) products at reasonable prices	Bear the cost of recycling, reusing or repairing the packaging they produce
		
Provide refillable products rather than single use packaging	Promote more reuse schemes, such as reusable carrier bags	

**Do you have any other comments or suggestions?**

Since the Environmental Services Association, the waste industry trade group, and other waste-related organisations and businesses are already lobbying for extended producer responsibility at the national level, it may be more useful for NLWA to focus on securing zero-waste or low-waste partnerships, agreements or projects with businesses that are based in North London.

### 5. What actions would you be willing to take?

Select one or more options



Buy items with less packaging



Recycle or reuse everything you can



More separation of things into extra bins / boxes for recycling



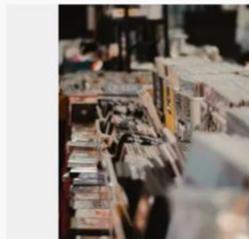
Avoid single-use food and drink containers and utensils



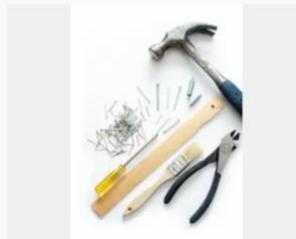
Buy second-hand items and donate used goods



Use food smartly - save leftovers, preserve or compost



Hire or borrow items rather than buying new



Learn to repair / upcycle

**Please tell us if there is anything else that you would do.**

The [Let's Talk Rubbish survey](#) conducted in 2022 covered significantly more topics than this survey. NLWA may wish to refer to its findings and recommendations, as well as the detailed notes on survey methodology, in the seven-borough [survey report](#).

## 6. What would you most like to see from your Council and NLWA?

### Select up to three

Select one or more options



Helping to educate and raise awareness of reuse and recycling amongst residents



Work to widen the range of things that can be recycled



Help give unwanted items another life through repair and reuse



Provide accessible and easy to use places to drop off waste / recycling and items for reuse / repair



Influence retailers, manufacturers and Government to ensure products are reusable/ recyclable

**Please tell us if there is anything else that you would like to see from your Council.**

Ideally, North London's councils—all of which are Labour-led—should work together to ensure a swift transition to a more circular economy, with the aim of reducing CO2 emissions, improving health, generating more jobs, and securing value for money.

They could take two steps in particular. First, following Hackney Council's lead, they could scrutinise NLWA's plans to build a new incinerator in Edmonton, given that the amount of waste is decreasing and that London already has enough incineration capacity, among other factors. Doing so would be in line with the London-wide Labour motion for a pause and review of the incinerator plans, passed by the London Labour Party Regional Conference on 24 July 2021. Second, they could investigate why NLWA has not yet committed to installing a mixed-waste sorting facility to extract recyclables (including compostables) from the waste stream prior to incineration.

All London councils submit Reduction and Recycling Plans to the Greater London Authority, which makes them available to the public on its [website](#). (Waltham Forest's plan may be missing on confidentiality grounds.) Good initiatives from some councils could usefully be emulated by other councils. Other plans, such as XR Zero Waste's [Ten Action Points for Camden Council: how to reduce residual waste by 65% and achieve 70% recycling by 2030](#), could also be helpful to other councils.

## Q7. Do you have any further comments, or is there anything specific you would like to see included in the new waste strategy?

The StEIN [response](#) makes suggestions for the new Joint Waste Strategy and notes that many should be acted on immediately, in view of the climate emergency. StEIN raises two key issues that are not addressed in the NLWA survey although they are at the very heart of North London's waste management:

1. the need for a pause and review of the **new waste incinerator** in Edmonton, in view of the latest available waste data and other relevant factors
2. the need for an **advanced sorting facility** in Edmonton to extract plastics and other recyclables, including compostables, as recommended by leading waste experts.

In a boiling world, the new Joint Waste Strategy needs to 'deliver a cleaner, greener and more sustainable future for north London' **rather than justifying business as usual** (waste incineration and low recycling). It needs to reduce the high risk that North Londoners will be locked into a socially unjust, carbon-intensive, uneconomic, take–make–waste system for decades to come, as is currently planned. NLWA is ideally positioned to deliver a transition to a genuinely low-waste North London, but to do that it must be willing to adapt to a new reality.

Add your email address