



5 June 2026

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By email to: North London Waste Authority Board Members and North London Council Leaders
Cc: North London MPs, North London Assembly Members, the Mayor of London, Secretary of State for Energy Security and Net Zero, and the Prime Minister

Urgent request for a pause and review of the plans for the new Edmonton incinerator

Dear NLWA Board Members and Council Leaders,

Many congratulations on your recent election successes and appointments to the Council leadership positions and to the Board of the North London Waste Authority (NLWA).

Since 2019, the Stop the Edmonton Incinerator Now (StEIN) campaign – together with many North London residents, community and civil society groups, and elected representatives across the political spectrum – have been calling on NLWA to pause and review its plans to replace the Edmonton waste incinerator, which began operations in 1971, with a new facility that would be 30% larger.¹

Evidence that has come to light since 2014 – the year that NLWA published its justifications for building a replacement incinerator – demonstrates the urgent need for a reassessment of the plans, including the timeline for decommissioning the current incinerator and proposals for associated district heat networks.

As discussed in greater depth in the fact sheet annexed to this letter, the evidence relates to:

1. **Flawed waste projections.** Actual waste levels are significantly below levels forecast by NLWA in 2014, undermining the argument for a 30% increase in incineration capacity.
2. **Waste reduction efforts.** Government waste reduction measures currently coming on stream are designed to drive down the tonnage of incinerated waste, further reducing the need for incineration capacity, and freeing up capacity at existing plants.
3. **Viable alternatives.** NLWA's plans do not factor in viable new alternatives for treating waste, such as a mixed-waste sorting facility (to maximise recycling and minimise emissions), available capacity at other incinerators in and around London, and a comprehensive waste prevention and recycling programme. Nor have genuinely low-carbon heating solutions, such as heat pumps with insulation, been considered as alternatives to the use of carbon-intensive incinerator heat in local district heat networks.
4. **Underestimated carbon emissions.** NLWA secured development consent and an environmental permit for the new Edmonton incinerator based on flawed calculations, which significantly underestimated the plant's CO₂ emissions. According to expert analysis, NLWA's emissions data were either 'grossly misleading' or reflected a 'failure to understand' decarbonisation of the national electricity grid.²

5. **Threats to public health.** Any waste incineration will contribute to poor air quality in Edmonton – a densely populated area already suffering from poor health and deprivation – as even the latest pollution abatement technology cannot filter out all of the toxins, such as nanoparticles. Moreover, construction delays are exposing the local population to significant environmental breaches from the current incinerator – Europe’s oldest – which NLWA admits is ‘significantly past design life for mechanical, electrical and civil infrastructure’.³
6. **Risks to value for money.** Spiralling construction costs and mounting delays; the inclusion of incineration in the Emissions Trading Scheme from 2028; unforeseen costs of keeping the current, failing plant operating until 2030 or longer; and financial incentives to maximise the diversion of waste from incineration combine to threaten NLWA’s ability to ensure value for money for North London’s councils and ratepayers. Increased incineration supply, coupled with lower demand, will drive down incinerator gate fees, reducing income from selling spare capacity.

Since 2019, we have sought to make the case to NLWA to pause and review its plans for the new incinerator, to no avail. We have also sought to hold NLWA to account, through extensive engagement, deputations, and information requests. Many of our information requests have been denied, especially with regard to: the latest incinerator cost projections and timelines for completion; the cost of exiting the construction contract; the updated business plan for the new incinerator; the implications of delays, etc., on council finances. These are questions that the new NLWA representatives need to demand answers to immediately.

Notwithstanding these unknowns, we believe we have enough evidence to respectfully request that NLWA Board Members take the following steps without delay:

- **Immediately pause the plans for the new incinerator.**
- **Review the strength of the environmental, public health, and business case.**
- **Commission a comprehensive environmental, public health, and business assessment of alternatives.**
- **Decommission the current incinerator as quickly as possible to safeguard public health.**

On Wednesday, 10 June, from 1PM we will be hosting an online briefing and Q&A session for NLWA Board Members and any North London councillors or council officers who would like more information. Shlomo Downen, National Co-ordinator of the UK Without Incineration Network (UKWIN), will join us in covering the points raised in this letter and annexed fact sheet. The Zoom link for this session is:

<https://us02web.zoom.us/j/87559144423?pwd=FDaqbL3Z5XGLGs0VjdmDGIVDi55apH.1>

Meeting ID 875 5914 4423, Passcode 866859

We hope to see you there. In the meantime, we are at your disposal for any questions.

Sincerely,
Stop the Edmonton Incinerator Now



FACT SHEET

The Edmonton incinerator: the pressing case for a pause and review

June 2026

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Overview

This fact sheet lays out the key reasons for an immediate reassessment of the plans to replace the current Edmonton waste incinerator, which has been operating since 1971, with a facility that would be 30% larger, including the timeline for decommissioning the ageing incinerator and proposals for associated district heat networks. While construction on the new incinerator has begun, it is years behind schedule and vastly over budget, offering councils a window of opportunity to reduce environmental, public health, and financial costs and to align plans with decarbonisation targets.

I. What is the North London Waste Authority?

The North London Waste Authority (NLWA) manages all household waste and some business waste from across the seven North London boroughs – Barnet, Camden, Enfield, Hackney, Haringey, Islington, and Waltham Forest. The waste for which NLWA is responsible is known as ‘Local Authority Collected Waste’ or ‘LACW’. NLWA has a budget of more than £100 million a year, with each borough paying between £9 million and £18 million annually.⁴



The EcoPark site at Advent Way, Edmonton, N18 3AG

NLWA’s EcoPark in Enfield contains the current ‘energy recovery facility’ (or ‘ERF’ – the incinerator); a new ‘resource recovery facility’ (a sorting facility) to process bulky waste and send processed waste as feedstock to the incinerator; a reuse and recycling centre or ‘bring site’ for the public to take their waste and recycles; and the main energy centre for Energetik’s heat network. Just north of the EcoPark is the Biffa Materials Recycling Facility (MRF), where NLWA’s collected recycling (except food and garden waste) is taken.

LondonEnergy Ltd (LEL) operates the waste incinerator at the Edmonton EcoPark.⁵ LEL sells electricity generated by the incinerator to the National Grid and plans to sell (less) electricity to the grid and some heat to Energetik from the replacement incinerator.

The North London Joint Waste Strategy is the overarching policy framework that governs how NLWA and its seven constituent boroughs manage waste. The Strategy prioritises waste reduction, reuse, repair, and recycling to protect the environment and drive progress towards a low-waste, circular economy.⁶

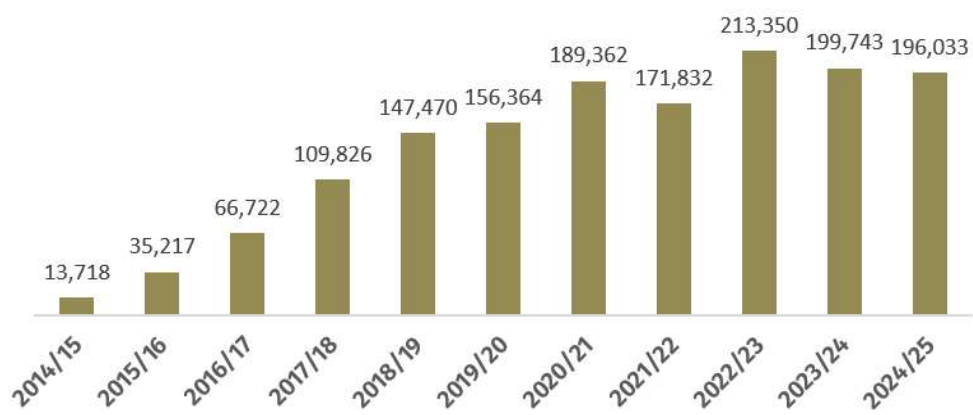
II. What are the key arguments for a pause and review of the new Edmonton incinerator?

1. Flawed waste projections

In 2014 NLWA published waste tonnage projections for North London to justify building a replacement incinerator in Edmonton.⁷

As Figure 1 shows, actual levels of North London’s waste (including material collected for recycling) are significantly below forecast levels, undermining NLWA’s original business case. As of 2024/25, total waste arisings were around 200,000 tonnes per annum lower than predicted in NLWA’s historic modelling.⁸

Figure 1 NLWA overestimates of annual Local Authority Collected Waste (tonnes)



As set out in the next section, waste reduction efforts will significantly reduce residual waste in the coming years, meaning there will be far less waste available for incinerator feedstock.

2. Waste reduction efforts

The Government has developed and begun to implement a series of waste reduction measures. These measures include a deposit return scheme (from 2027),⁹ extended producer responsibility for packaging,¹⁰ and simpler recycling,¹¹ including mandatory separate food waste collection and kerbside collection of more types of plastic. These and other measures will drive down the tonnage of incinerated waste, thereby reducing the need for incineration capacity whilst freeing up capacity at existing facilities. An April 2025 guide from the Local Government Association (LGA) provides a useful resource for councillors and waste officers.¹²

There is now also a statutory residual waste reduction target¹³ designed to halve the amount of waste sent to either incineration or landfill by 2042 compared to a 2019 base year. In 2019 NLWA sent less than 550,000 tonnes of material for incineration¹⁴ and around 50,000 tonnes to landfill.¹⁵ If the level of incinerated and landfilled waste were halved, this would equate to less than 275,000 tonnes for incineration and around 25,000 tonnes for landfill.

Halving residual waste would be in line with the ‘low tonnage growth, high recycling rate’ projection (Projection E) set out in the evidence base for the North London Joint Waste Strategy, which states that such reductions would represent ‘hypothetical “best practice” and the trajectory of the Mayor’s regional targets for recycling’.

According to the work carried out by Frith for NLWA, in that scenario 'residual waste arisings are expected to halve from around 600ktpa to c.280ktpa' and one way to achieve this is 'to increase recycling of residual waste prior to disposal', for example through pre-sorting at a mixed-waste sorting facility.

Another measure that will reduce residual waste is the inclusion of incineration in the UK Emissions Trading Scheme (UK ETS), which puts a price on the carbon released by incinerators. According to the aforementioned LGA guide, this would result in 'more recyclable or reusable materials diverted from incineration to provide continued value in the circular economy'.

Building an incinerator large enough to accommodate 700,000 tonnes per year, 30% more than the current plant, is thus incompatible with both the regional and national direction of travel.

3. Viable alternatives

The Edmonton incinerator is being promoted both as a means for waste management and as a source of heat. In both cases, there are viable alternatives.

Waste management alternatives: NLWA could take advantage of viable alternatives for minimising and treating North London's waste, including the following:

- **A mixed-waste sorting (MWS) facility:** Experts have long advocated MWS as a means of extracting recyclables from the residual waste stream. Such an approach reduces CO₂ emissions, lowers toxic pollution, and slashes costs, including costs arising from the inclusion of energy-from-waste (EfW) incineration in the ETS.¹⁶

In a 2025 report commissioned by NLWA, the consultancy Eunomia identifies the same drivers for investing in the pre-sorting of residual waste. The report recommends that NLWA keep this topic 'open' and 'develop a more detailed assessment in the future', noting that conditions for MWS may become 'more favourable' once extended producer responsibility for packaging is embedded (a process that is already well underway) and the ETS kicks in for waste incineration (from 2028). It also observes that once the existing incinerator is decommissioned, a mixed-waste sorting facility could be sited on the freed-up land.¹⁷

The rising number of vape batteries and the associated damage caused by the fires they create when incinerated¹⁸ adds urgency to the need for pre-sorting, with the Fire Protection Association warning in September 2025 that: 'Vapes that are put into general waste or mixed recycling, where they can be crushed or incinerated, are serious fire risks.'¹⁹ Similar problems are being caused by nitrous oxide canisters, which can cause serious harm to the plant when they explode within the incinerator.²⁰

To ensure compliance with the Joint Waste Strategy and avoid foregoing potential MWS benefits, NLWA is encouraged to commission a new assessment.

- **Available capacity in other incinerators in and around London:** Since the Edmonton rebuild was first proposed, incineration capacity in and around London (excluding Edmonton) has increased to more than 7 million tonnes, while demand for incineration is expected to fall to meet recycling and residual waste reduction targets.²¹

As envisioned in NLWA's 'alternative waste disposal methods' scenario of 2021, North London's genuinely residual waste could be sent to other incinerators.²²

An instructive case involves the East London Waste Authority, which in 2025 decided not to build an incinerator and instead to send its waste to the Cory Riverside complex in south-east London. The waste authority opted for a contract without fixed minimum waste tonnages, with a view to meeting the Government’s waste reduction measures without worrying about feeding a new incinerator.²³

While there may be some transport miles associated with temporarily sending waste to nearby incinerators, proceeding with the current Edmonton rebuild plans would result in a need to import significant amounts of waste from outside of North London (or even abroad) to keep the facility operating at capacity. With today’s electric transport, excessive emissions need not be incurred for waste that NLWA sends to neighbouring areas.

As set out below, the long-term solution is to move away from incineration altogether.

- **A comprehensive waste prevention and recycling programme:** There is a correlation between high rates of incineration and low rates of recycling.²⁴ According to the London Assembly’s Environment Committee, ‘Investing in more EfW can negatively affect long term recycling rates.’²⁵ Indeed, numerous councils have attributed their low recycling rates to incineration-based waste contracts that prevent or disincentivise them from investing in recycling.²⁶

It may thus come as no surprise that NLWA’s household recycling rate for 2024/25 was a dismal 28.2%, significantly below their 2020 target of 50% – and well below the London and national averages of 33% and 44%, respectively.²⁷ A 28.2% recycling rate means that more than 70% of North London’s household waste is incinerated – although more than half of this material could be recycled if properly sorted (see the point about MWS, above).²⁸

In line with its new Joint Waste Strategy, which covers the period 2025–2040, NLWA has pledged to increase its household recycling rate to 50% by 2040, reduce waste, halve avoidable food waste and recyclable materials in residual waste, and double the proportion of materials reused at reuse and recycling centres. The Government waste reduction measures described above are likely to support NLWA in achieving these goals. Nevertheless, attaining them will require NLWA to develop and implement a comprehensive waste prevention and recycling programme – one that may be incompatible with operating a 700,000-tonne incinerator at capacity.

In this context, NLWA’s decision to reduce its combined budget for recycling initiatives and waste prevention and communications despite receiving a windfall of nearly £15 million in extended producer responsibility funds from the government in 2025 has raised concerns as to its level of commitment to a comprehensive waste prevention and recycling programme.²⁹

Heat alternatives: Viable alternatives are also available when it comes to heating.³⁰ And today’s more frequent heatwaves make clear the urgent need to incorporate cooling into heating solutions, which heat from the incinerator cannot offer.

Genuinely low-carbon heating solutions, such as communal and individual heat pumps and better insulation, represent alternatives to the use of carbon-intensive incinerator heat in local district heat networks. For details, see the section on Energetik, below.

4. Underestimated carbon emissions

NLWA secured development consent and an environmental permit for the new Edmonton incinerator based on flawed calculations, which produced a significant underestimate of the plant's CO₂ emissions.

In response to NLWA's repeated, unfounded claims that sending waste to landfill is significantly more damaging in carbon terms than incineration, Eunomia founder Dr Dominic Hogg demonstrated that treating waste in the Edmonton incinerator would actually produce significantly *more* CO₂ emissions than landfilling it, and *increasingly more* over time (as the grid decarbonises). By failing to publish revised carbon figures, NLWA continues to spread 'grossly misleading' statements to the public and politicians about the true carbon footprint of the Edmonton incinerator.³¹

There are also concerns that NLWA documents and communications report only the fossil CO₂ emissions from the incinerator. In their public communications, NLWA gives the false impression that emissions from burning food, wood, paper, card, and garden waste can be ignored, despite the fact that these harmful emissions form around half of the incinerator's CO₂ emissions.³²

Put simply, waste incinerators currently release about 1 tonne of CO₂ for every tonne of waste incinerated.³³ In 2025 the Edmonton incinerator burnt just under 500,000 tonnes of material and released more than 500,000 tonnes of CO₂ into the atmosphere.³⁴ If built and operating at capacity, the new incinerator – whose operational lifetime could well exceed 50 years – would emit about 700,000 tonnes of CO₂ per year, amounting to a staggering 35 million tonnes of CO₂ over 50 years.

Promoters of the Edmonton rebuild describe the new incinerator as 'carbon capture ready', yet there is currently no viable business plan to capture any carbon from the plant, as it is not located within any of the Government-subsidised carbon capture clusters. Moreover, carbon capture and storage (CCS) technology is increasingly mired in controversy, with the Public Accounts Committee calling it 'unproven' and 'high-risk'.³⁵ Nevertheless, NLWA spent more than £1.2m on a CCS 'outline business case' in 2024/25 and earmarked another £1.5m for the next three years – sunk costs unless the Government changes course and pours billions into 'dispersed emitters' such as the Edmonton incinerator.³⁶

When it comes to heating homes and businesses, NLWA has made unsupported claims that incinerator heat is the only available 'low-carbon' source of heating and hot water. Given NLWA's rhetoric, it is not surprising that Energetik's promotional materials claim without proof that the carbon intensity of incinerator heat is comparable to or even lower than that of low-carbon heat solutions, such as air-source and ground-source heat pumps. Indeed, Energetik's website 'for developers' features unsupported assertions about incinerator energy being 'renewable' while playing down the role of genuinely low-carbon alternatives (see the section on Energetik, below).³⁷

In sharp contrast, the BBC reported in 2024 that burning waste in incinerators had become the 'dirtiest way the UK generates power'. The analysis quoted scientists describing incineration as a 'disaster for the climate'.³⁸

5. Threats to public health

The proposed Edmonton incinerator entrenches a pattern of socially unjust siting of polluting infrastructure in one of the most deprived areas in the UK, where 65% of the residents are from ethnic minority backgrounds, health indicators are already poor, and air pollution already breaches legal limits.³⁹

Unlike the limited research typically cited by waste incineration proponents, a significant meta-study published by Wiley in 2019 assesses 93 scientific research papers and corroborates the plausibility of a causal link between waste incineration and birth defects and miscarriage. The study finds that there is insufficient evidence to conclude that any incinerator is safe; it also observes that it is premature to conclude that new technologies improve the safety of energy-from-waste incinerators.⁴⁰

Any new incinerator will contribute to poor air quality in Edmonton, as even the latest pollution abatement technology cannot filter out all toxins. Of great concern are nanoparticles (also known as ultrafine particulates, or PM0.1), which ‘constitute a significant health hazard’, make up by far the majority of particles emitted by incinerators, and are able to pass through advanced filters into the local environment.⁴¹

There is no safe level of particulate exposure. In expert testimony given to the Environment, Food and Rural Affairs Committee on 6 July 2021, Bill Parish, head of Defra’s Air Quality and Industrial Emissions, testified that because ultrafine particulates are so small, ‘it’s very difficult to find a filtration process that can capture them all’.⁴²

Another concern relates to *de novo synthesis*, a process by which particles can combine to form new toxins in the cooling gases after leaving the stack, regardless of any scrubbing apparatus or other pollution abatement technology.⁴³

Construction delays on the new incinerator are exposing the local population to increasingly elevated risks of significant environmental breaches in the current, failing incinerator – Europe’s oldest – which NLWA admits is ‘significantly past design life for mechanical, electrical and civil infrastructure’.⁴⁴

This incinerator has been operating since 1971 and is ready to be shut down (decommissioned). NLWA had initially envisioned replacing it in 2025, but the decommissioning has since been pushed off to 2030 or later.⁴⁵

LEL reported that in 2025 the Edmonton incinerator released:⁴⁶

- 1.63 kg of arsenic
- more than 3 kg of cadmium
- more than 10 kg of mercury
- more than 2 tonnes of particulate matter
- more than 665 tonnes of nitrogen oxides.

LEL also reported that the Edmonton incinerator breached the permit more than two dozen times, making Edmonton one of the five worst incinerators in England with regard to the number of permit breaches.⁴⁷

Maintaining the old plant also exposes local residents to higher risks of other-than-normal operating conditions (OTNOC), such as emergency shutdowns, leaks, or start-ups after a failure, which are typically associated with much higher toxic emissions. More than a year's load of dioxins can be emitted in a single OTNOC incident.⁴⁸ The risk of an OTNOC situation increases exponentially as plants operate beyond their lifetime.⁴⁹

While our campaign has hitherto focused on calling for pause and review of the plans for a new incinerator, **the public health case is now sufficiently strong that NLWA should expedite the decommissioning of the current incinerator as a matter of urgency. The decommissioning of the current incinerator cannot be conditional on finding a longer-term solution to dispose of North London's waste.**

6. Risks to value for money

The cost of the new Edmonton incinerator has spiralled as the completion date has been pushed off into the next decade.⁵⁰ While in 2015 the project was advertised as costing £450m–£500m.⁵¹

Best practice for project management involves the use of both cost and completion date ranges, as recognised by the Association for Project Management. Along with other groups, we have requested that NLWA make public the ranges arrived at by Arup, who worked independently of the incinerator project team. In particular, requests were made for transparency on the outturn cost and completion date associated with a 90% probability. NLWA has yet to make public the revised costs and completion date.

The waste industry estimates the planned inclusion of incineration in the UK Emissions Trading Scheme as of 2028 will increase the costs of incineration by around 50%.⁵²

Many councils are looking to reduce these liabilities by maximising diversion from incineration. Doing so will reduce demand for incineration capacity across the board, reducing how much NLWA could expect to earn from selling spare Edmonton capacity. This also means that if NLWA continues with the Edmonton rebuild they would miss out on opportunities to achieve better value for money through the alternative approach of investing in the top tiers of the waste hierarchy (such as repair, reuse, recycling, and composting).

The Local Government Association (LGA) advises that, to avoid ETS costs, councils should:⁵³

- Adjust collections service design for more ambitious waste reduction, because less residual waste means less waste sent to incineration, thereby reducing disposal costs.
- Introduce wider waste reduction policies, such as education programmes, plastic-free initiatives, and local reuse schemes to mitigate rising waste costs and improve sustainability.
- Employ long-term planning and investment to increase recycling, and evaluate EfW disposal budgets to quantify potential savings from reduced EfW usage.

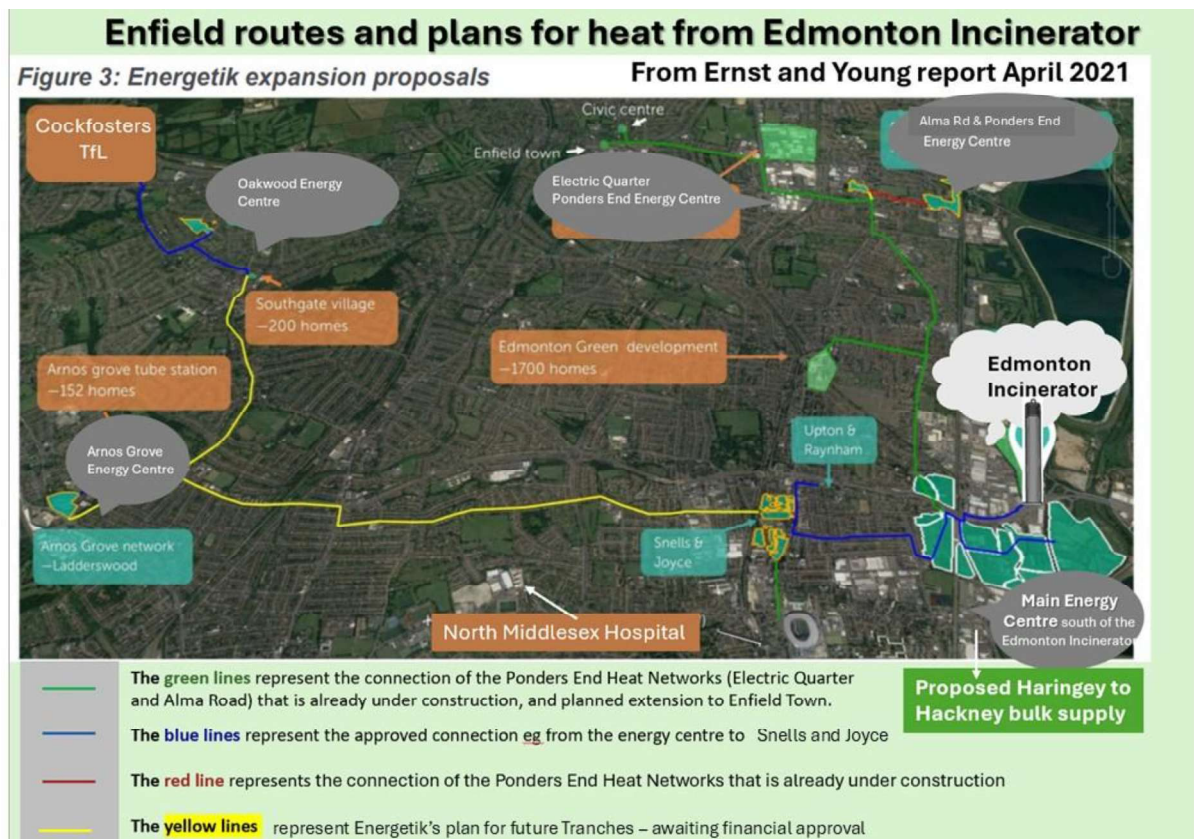
The LGA also notes that: 'As EfW contracts expire, there is an opportunity to reflect on whether contracts align with waste reduction goals and financial sustainability' on the basis that 'longer-term agreements could lead to higher costs as EfW becomes more expensive' due to ever-increasing ETS costs.

III. What is the relationship between NLWA and Energetik's heat networks?

Alongside the pause and review, Enfield Council and others will have to make informed decisions, based on financial and environmental assessments, regarding the future of Energetik's heat networks in Enfield and other boroughs.

These decisions will need to take full account of today's opportunities for genuinely low-carbon, low-cost heating and cooling solutions that do not rely on a rebuilt Edmonton incinerator.⁵⁴

The proposed pause in the Edmonton rebuild project would also provide the time needed to reassess the relationship between NLWA and Energetik.



Note: The grey speech bubbles show current Energetik satellite heat networks.

Any review should consider:

- opportunities for lower-carbon, lower-cost alternatives to reliance on the Edmonton incinerator (and gas boiler backups)
- income to NLWA's wholly owned subsidiary, LondonEnergy Ltd (LEL)
- contracted heat output from LEL to Energetik
- greenhouse gas emissions
- Enfield Council's business plan for Energetik's predicted connection profile.

Acknowledgements

The Stop the Edmonton Incinerator Now (StEIN) campaign gratefully acknowledges the support of the United Kingdom Without Incineration Network (UKWIN) in preparing this fact sheet.

For additional information, please visit <https://stop-edmonton-incinerator.org>.

Endnotes

- ¹ <https://stop-edmonton-incinerator.org/wp-content/uploads/2020/01/CarinaPresentation-1.pdf>
- ² <https://stop-edmonton-incinerator.org/press-release-edmonton-incinerator-data-grossly-misleading-or-sign-of-ignorance/>
- ³ <https://enfielddispatch.co.uk/edmonton-incinerator-tops-uk-list-of-environmental-permit-breaches/> and <https://haringeycommunitypress.co.uk/2026/01/12/incinerator-to-be-used-past-design-life-thanks-to-slow-progress-on-new-facility/> and <https://www.nlwa.gov.uk/sites/default/files/2026-02/07%20Governance%20of%20LEL%20Part%20I.pdf>
- ⁴ <https://www.nlwa.gov.uk/sites/default/files/2026-02/02%20Budget%20and%20Levy%2026-27.pdf>
- ⁵ <https://find-and-update.company-information.service.gov.uk/company/02732548>
- ⁶ <https://www.nlwa.gov.uk/article/north-london-joint-waste-strategy-2025-2040>
- ⁷ <https://web.archive.org/web/20190722183247/https://www.nlwa.gov.uk/about/authority-strategies/waste-analysis-documents/> and http://ukwin.org.uk/files/eunomia_nlwa_waste_forecast_model_v8_final_version_for_publication.xlsm
- ⁸ Compared to 'Local authority collected waste - not sent for recycling' reported by Defra for the North London Waste Authority at <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables> and <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results>
- ⁹ <https://www.gov.uk/guidance/deposit-return-scheme-drinks-producer-and-retailer-responsibilities>
- ¹⁰ <https://www.gov.uk/guidance/extended-producer-responsibility-for-packaging-who-is-affected-and-what-to-do>
- ¹¹ <https://www.gov.uk/government/publications/simpler-recycling-in-england-policy-update/simpler-recycling-in-england-policy-update>
- ¹² <https://www.local.gov.uk/publications/councillors-guide-waste-and-recycling-reforms>
- ¹³ <https://www.gov.uk/government/publications/residual-waste-reduction-environment-act-target-delivery-plan/residual-waste-reduction-environment-act-target-delivery-plan>
- ¹⁴ <https://ukwin.org.uk/incinerators/library/North+London/48>
- ¹⁵ <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables>
- ¹⁶ See, for example, reloop's 2022 report *The case for sorting recyclables prior to landfill and incineration* (https://www.reloopplatform.org/wp-content/uploads/2022/06/D-HOGG- Reloop_FINAL_June2022-1.pdf). Similarly, the 2023 *NLWA Waste Projections Briefing Note* by Frith Resource Management indicates that a way to boost the recycling rate is through 'recycling from a dirty MRF [material recovery facility] or pre-treatment before EfW' (<https://thisisla.com/wp-content/uploads/2024/11/Appendix-1-JWS-Waste-Projections.pdf>).
- ¹⁷ https://www.nlwa.gov.uk/sites/default/files/2026-05/eunomia_mixed_waste_sorting_report.pdf
- ¹⁸ <https://www.theguardian.com/society/2023/may/13/single-use-vapes-sparking-surge-in-fires-at-uk-waste-plants>
- ¹⁹ https://www.thefpa.co.uk/fire-and-risk-management-journal/news/waste-companies-report-rise-in-vape-fires-following-ban?utm_source=chatgpt.com
- ²⁰ <https://www.gasworld.com/story/waste-canister-explosions-cause-7m-in-efw-plant-costs/2172703.article/>
- ²¹ <https://ukwin.org.uk/incinerators/?filter=®ion=&existing=show&potential=show>
- ²² NLWA 'alternative waste disposal methods' scenario assumes that if the Edmonton incinerator were not built, then all waste would instead be treated 'at a third-party facility, assuming that sufficient capacity could be secured' (<https://www.nlwa.gov.uk/sites/default/files/2021-12/03%20ERF%20Procurement.pdf>).

In this scenario, the EcoPark South recycling facilities would still be built, while the old incinerator would cease operation in 2026 and be demolished. 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'. While it is not clear how many years would be covered in the scenario's 'long-term' contract for the 400,000 tonnes, that tonnage estimate does come in between two recent NLWA projections for 2050 that assume 'low tonnage growth' with high or best-practice recycling: 280,000 tonnes and 500,000 tonnes, respectively (<https://thisislca.com/wp-content/uploads/2024/11/Appendix-1-JWS-Waste-Projections.pdf>). This tonnage accounts for just over half of the planned incinerator's 700,000-tonne capacity, raising questions as to the justification for such a large incinerator.

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<https://eastlondonwaste.gov.uk/articles/News+and+Public+Statements/Ratification+of+Residual+Waste+Contract+Award+Decision>

²⁴ See, for example: <https://ukwin.org.uk/files/pdf/UKWIN-Policy-Suggestions-November-2020.pdf>; <https://ukwin.org.uk/2014/10/22/ukwin-welcomes-efracoms-incinerator-caution/>; https://ukwin.org.uk/btb/BtB_Incineration_Harms_Recycling.pdf; and <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/housing-communities-and-local-government-committee/implications-of-the-waste-strategy-for-local-authorities/written/103388.pdf>.

²⁵ https://www.london.gov.uk/sites/default/files/waste-energy_from_waste_feb15.pdf

²⁶ A report by the London Assembly Environment Committee corroborates these findings: 'The terms of [incineration] contracts, such as minimum annual payments, or a low fee per tonne of waste, can undermine the financial viability for the local authority of reducing waste, or sending it to other destinations such as recycling' (https://www.london.gov.uk/sites/default/files/waste-energy_from_waste_feb15.pdf). See also <https://ukwin.org.uk/files/pdf/UKWIN-EPR-Consultation-Submission-May-2019.pdf>; <https://ukwin.org.uk/files/pdf/UKWIN-Incineration-Overcapacity-Briefing-September-2023.pdf> (p. 6); <https://ukwin.org.uk/files/pdf/UKWIN-Incineration-Overcapacity-Annex-2023.pdf> (pp. 12–14); <https://ukwin.org.uk/files/pdf/UKWIN-Examples-of-incineration-harming-recycling-July-2019.pdf>; and <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/environment-food-and-rural-affairs-committee/plastic-food-and-drink-packaging/written/104997.pdf>.

²⁷ <https://haringeycommunitypress.co.uk/2025/06/27/north-london-waste-authority-agrees-50-recycling-target-after-failing-to-hit-30-last-year/>

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1036297/resource-waste-monitoring-progress-second-edition-nov-2021.pdf

²⁹ <https://www.hamhigh.co.uk/news/24976138.climate-emergency-camden-happens-recycling/>

³⁰ <https://drive.google.com/file/d/1YbVKlSt6Pt6-94wvdm93-3FOYZg5TYu/view>

³¹ Eunomia founder Dr Dominic Hogg identified two key errors in NLWA's CO₂ emissions figures: 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 (<https://static1.squarespace.com/static/5fac6c36040eba5dc1b46766/t/62582306b13846610205e7dd/1649943305722/Eligibility+of+Incineration+for+Green+Bonds+Final+Version.pdf>). Dr Hogg concluded that the use of a 2013 figure for an incinerator that was not expected to be operational until 2026 or later 'is either grossly misleading or reflects a failure to understand what is happening to the UK power generation system', which is decarbonising rapidly (<https://www.dominichogg.com/hoggblog/should-incineration-attract-finance-from-green-bonds>). See also <https://stop-edmonton-incinerator.org/wp-content/uploads/2025/01/NLWA-Letter-to-SoS-Miliband-greenwashes-Edmonton-incinerator.pdf>.

³² <https://www.ipcc-nggip.iges.or.jp/faq/faq.html> and <https://stop-edmonton-incinerator.org/wp-content/uploads/2020/05/2020-05-26-XR-rebuttal-of-NLWA-claims.pdf>

³³ <https://ukwin.org.uk/files/pdf/UKWIN-2018-Incineration-Climate-Change-Report.pdf>

³⁴ <https://ukwin.org.uk/incinerators/library/North+London/48>

³⁵ <https://committees.parliament.uk/committee/127/public-accounts-committee/news/205139/carbon-capture-high-degree-of-uncertainty-whether-risky-investment-by-govt-will-pay-off/> and <https://www.reuters.com/sustainability/climate-energy/comment-carbon-capture-storage-is-dangerous-distraction-its-time-imagine-world-2023-12-11/> and <https://genn.cc/ccuk-piers-forster/>

³⁶ https://www.nlwa.gov.uk/sites/default/files/2024-07/nlwa-carbon-capture-update-appx-a-pt1_0.pdf

³⁷ <https://energetik.london/how-it-works/developer/>

³⁸ <https://www.bbc.co.uk/news/articles/cp3wxgje5pwo>

³⁹ <https://unearthed.greenpeace.org/2020/07/31/waste-incinerators-deprivation-map-recycling/> and <https://www.theguardian.com/environment/2020/jul/31/uk-waste-incinerators-three-times-more-likely-to-be-in-deprived-areas> and <https://www.theguardian.com/environment/2020/jul/31/edmonton-incinerator-expansion-fundamentally-unjust-say-residents> and <https://letstalk.enfield.gov.uk/edmontongreenqn?tool=qanda>

⁴⁰ <https://onlinelibrary.wiley.com/doi/full/10.1111/1753-6405.12939>

⁴¹ <https://ukwin.org.uk/files/pdf/211208-waste-incineration-and-public-health-appg-air-pollution-report.pdf>

⁴² <https://www.parliamentlive.tv/Event/Index/4ce44852-38d6-4bed-b270-f81dd270ccc4>

⁴³ <https://ukwin.org.uk/files/pdf/211208-waste-incineration-and-public-health-appg-air-pollution-report.pdf> and <https://www.nlwa.gov.uk/sites/default/files/2021-12/Deputations.pdf>

⁴⁴ <https://enfielddispatch.co.uk/edmonton-incinerator-tops-uk-list-of-environmental-permit-breaches/> and <https://haringeycommunitypress.co.uk/2026/01/12/incinerator-to-be-used-past-design-life-thanks-to-slow-progress-on-new-facility/> and <https://www.nlwa.gov.uk/sites/default/files/2026-02/07%20Governance%20of%20LEL%20Part%20I.pdf>

⁴⁵ <https://enfielddispatch.co.uk/edmonton-incinerator-to-be-used-past-design-life-thanks-to-slow-progress-on-new-facility/> and <https://www.nlwa.gov.uk/latest/feedback-welcomed-replacement-waste-facility>

⁴⁶ <http://ukwin.org.uk/files/ea-disclosures/EA-2025-Pollution-Inventory-Incinerator-Extract-April-2026.xlsx>

⁴⁷ <https://ukwin.org.uk/library/48-AnnualPerformanceReport-2025.xls> and <https://ukwin.org.uk/incinerators/>

⁴⁸ <https://ukwin.org.uk/files/pdf/211208-waste-incineration-and-public-health-appg-air-pollution-report.pdf>

⁴⁹ <https://www.cewep.eu/wp-content/uploads/2019/08/4-2019.06.04-NOC-OTNOC-EOT-issue.pdf> and <https://www.clf.org/blog/aging-incinerators-pose-a-danger/>

⁵⁰ <https://www.bbc.co.uk/news/articles/cwy44ke1vjwo> and <https://enfielddispatch.co.uk/construction-delays-to-edmonton-incinerator-causing-disarray/>

⁵¹ <https://www.nlwa.gov.uk/latest/feedback-welcomed-replacement-waste-facility> and <https://www.nlwa.gov.uk/ourauthority/scheme-of-publications/request-information-north-london-heat-and-power-project> and <https://www.nlwa.gov.uk/sites/default/files/2026-02/02%20Budget%20and%20Levy%2026-27.pdf>

⁵² https://www.ciwm.co.uk/ciwm/news/2025/ciwm_report_urges_caution_when_introducing_ets_into_uk_energy_from_waste_sector.aspx

⁵³ <https://www.local.gov.uk/publications/councillors-guide-waste-and-recycling-reforms>

⁵⁴ https://drive.google.com/file/d/1qzVPngPX6ssZyJjQOrnmkyb5_nUzdPk/view?usp=drive_link