

NORTH LONDON WASTE AUTHORITY

THURSDAY, 16 DECEMBER 2021 AT 2.30 PM
THE COUNCIL CHAMBER, CROWDALE CENTRE, 218 EVERSOLT STREET,
LONDON, NW1 1BD

Enquiries to: Cheryl Hardman, Committee Services
E-Mail: cheryl.hardman@camden.gov.uk
Telephone: 020 7974 1619 (Text phone prefix 18001)
Fax No: 020 7974 5921

SUPPLEMENTARY AGENDA

6. DEPUTATIONS (IF ANY)

(Pages
5 - 32)

Ten deputation requests have been received by the deadline and the Chair has decided to accept them all. The agenda referred to planning the deputation order on objective criteria. These are: whether the deputation is by a representative, which will be prioritised over individuals; linking of deputations covering related topics; and whether the topics have been considered previously in deputations to the Authority. Deputations referring only to issues already presented in papers for the meeting are ranked lowest. Based on this, the deputations have been ordered as follows:

- EnCaf Youth submission of a recorded video

deputation

- Dr Edward Tranah
- Mrs Sydney Charles
- Dr Rembrandt Koppelaar
- Ms Kate Osamor MP
- Mr Nick Earl
- Professor Vyvyan Howard
- Councillor Charith Gunawardena
- Mr Malcolm Stow
- Mr Iain Thomson

The Chair proposes to hear the deputations immediately before item 10 **NORTH LONDON HEAT AND POWER PROJECT ENERGY RECOVERY PROCUREMENT**, to which they relate. Provided Members have agreed to waive Standing Orders, and the meeting is therefore extended to 17.00, the deputations will be heard to finish at 16.00, to ensure that the business of the meeting can be concluded in the time available. Members are able to ask questions to any deputation if they wish to do so. The time allowed for any questions and answers will be limited to 5 minutes for any deputation on which a question is posed. At 16.00 the Chair will move to consideration of the report. Any deputations which have not been heard at that point will not be heard.

Where a full deputation statement has been provided, it will be taken into account by Members whether or not there is sufficient time for the deputation to be heard.

SUPPLEMENTARY AGENDA ENDS
Issued on: Wednesday, 15 December 2021

This page is intentionally left blank

Agenda Item 6

From: [Olivia Eken](#)
To: [Cheryl Hardman](#)
Subject: Re: Deputation request EnCaf Youth
Date: 14 December 2021 09:52:43

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Cheryl,

Sorry for my delayed response, we would like to discuss the environmental and social implications of the Edmonton incinerator expansion, particularly its impact on young people and marginalised communities. My address is [REDACTED]

Kind regards,
Olivia

> On 14 Dec 2021, at 08:21, Cheryl Hardman <Cheryl.Hardman@camden.gov.uk> wrote:

>

> Dear Olivia

>

> Can you please send me your deputation statement outlining the subject that you wish to discuss by 9am so that I can consult with the Chair? Please note that deputation statement is published on the supplementary agenda. Can you also please provide your addresses in accordance with Standing Orders?

>

> Thanks

>

> Cheryl

>

> --

> Cheryl Hardman

> Principal Committee Officer

>

> Telephone: 020 7974 1619

>

>

>

> If you have requested to address or make a written submission to a Committee, please see our new Privacy Notice here which tells you how we store and process the data we hold about you and residents.

>

> -----Original Message-----

> From: Olivia Eken [REDACTED]

> Sent: 14 December 2021 07:52

> To: Cheryl Hardman <Cheryl.Hardman@camden.gov.uk>

> Subject: Deputation request EnCaf Youth

>

> [EXTERNAL EMAIL] Beware – This email originated outside Camden Council and

may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

>

> Dear Cheryl,

>

> I would like to submit a deputation request for the NLWA meeting on December 16th on behalf of EnCaf Youth. The members James Dumonbreville and Olivia Eken will be speaking.

>

> EnCaf Youth is a climate action group comprised of sixth-formers, thus proving it difficult to attend the live meeting as it overlaps with our school timetable. In spite of this, would we be able to provide a pre-recorded video to express our views at the meeting.

>

> I look forward to hearing back from you.

>

> Kind regards,

> Olivia Eken

>

> This e-mail may contain information which is confidential, legally privileged and/or copyright protected. This e-mail is intended for the addressee only. If you receive this in error, please contact the sender and delete the material from your computer. See our new Privacy Notice here<<http://www.camden.gov.uk/privacystatement>> which tells you how we store and process the data we hold about you and residents.

From: [Ed Tranah](#)
To: [Cheryl Hardman](#)
Subject: Re: Deputation request
Date: 09 December 2021 11:36:34
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image005.jpg](#)
[image006.png](#)
[image007.png](#)
[image009.png](#)
[image011.jpg](#)

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Hi Cheryl,

Apologies, is the following ok?

Deputation statement:

"I do not believe that the NLWA Members will be acting in the best interests of North London residents if they vote to award a contract for the construction of a new ERF in Edmonton on 16th December.

It is increasingly difficult to be able to justify the incineration of mixed waste, with or without energy recovery, in the context of unmet recycling targets. The NLWA must focus on more stringent application of the waste hierarchy, and I worry that the commodification of energy from waste will disincentivise actions to do this and to achieve our recycling targets.

I do not, for one second, think that managing the waste of 2 million residents, is a simple feat. But I also truly believe that the NLWA can manage its residents' waste better, in a manner that applies the precautionary principle to both carbon emissions and air pollution, and reassures significant concerns regarding social and racial injustice."

Yours sincerely,

Dr Edward Tranah

From: Cheryl Hardman <Cheryl.Hardman@camden.gov.uk>
Sent: 09 December 2021 11:23
To: Ed Tranah [REDACTED]
Subject: RE: Deputation request

Dear Dr Tranah

Thank you for this. Could you please provide a deputation statement setting out the points you would like to raise so that I can share with the Chair?

Thanks

Cheryl

Cheryl Hardman
Principal Committee Officer

Telephone: 020 7974 1619



If you have asked to make a deputation or a written submission to a Committee, please see our Privacy Notice [here](#) which tells you how we store and process the data we hold about you and residents.

The majority of Council staff are continuing to work at home through remote, secure access to our systems. Where possible please communicate with us by telephone or email.

From: Ed Tranah [REDACTED]
Sent: 08 December 2021 23:36
To: Cheryl Hardman <Cheryl.Hardman@camden.gov.uk>
Subject: Re: Deputation request

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Cheryl,

This deputation request relates to the moral responsibility that NLWA Members have to act in the best interests of those whom they have been elected to represent.

I do not believe that the NLWA Members will be acting in the best interests of North London residents if they vote to award a contract for the construction of a new ERF in Edmonton on 16th December.

I am forming this deputation, solely, and will be addressing the Authority, solely, also.

I'd be grateful if you could please confirm receipt of this deputation request.

Yours sincerely,

Dr Edward Tranah

From: Cheryl Hardman <Cheryl.Hardman@camden.gov.uk>

Sent: 28 October 2021 14:29

To: Ed Tranah [REDACTED]

Subject: RE: Deputation request

Dear Ed

Thank you for your email. The deadline for sending a deputation request is 9am on Tuesday 14 December. The deputation request should indicate the matter to which the request relates, the number (which shall not exceed 7) and names and addresses of the persons who will form the deputation and the one member of the deputation who will address the Authority. The Chair will then be consulted on any deputation requests.

Deputies are encouraged to attend the meeting in person and each deputation has five minutes to speak. Please note that there is limited capacity in the public galleries.

Covid safe measures

- You are advised to take a free Lateral Flow Test before you attend the meeting. Home testing kits are available from <https://www.gov.uk/order-coronavirus-rapid-lateral-flow-tests> or you can find out where your nearest test centre is at <https://maps.test-and-trace.nhs.uk/>. If you test positive, please self-isolate with your household and book a follow-up PCR test within 48 hours to confirm the result.
- If you are feeling unwell, please do not attend. If you have symptoms of Covid-19 (a high temperature, a new continuous cough or a loss or change to your sense of smell or taste), please follow Government guidance.
- Unless you are exempt, you must wear a face covering at all times once inside the building, except when you are seated.
- Hand sanitiser stations will be available – please sanitise on arrival and at regular intervals thereafter.

If you would prefer not to attend the meeting in person, but instead to give your deputation remotely, that option is available to you. However, you should note that, in the unlikely event of a technical failure meaning that you are unable to address the Authority remotely, the meeting will proceed in your absence and your deputation request will be taken as read. If you do wish to join remotely and your deputation request has been accepted, please let me know so that I can provide you with the Microsoft Teams link that you will need to do this.

Everyone is welcome to watch the public live stream of the meeting, which will be available at www.camden.gov.uk/webcast.

I hope this assists but please let me know if you have any further questions.

Thanks

This page is intentionally left blank

From: [sydney.charles](#)
To: [Cheryl.Hardman](#)
Subject: FW: Deputation from Mrs Sydney Charles to NLWA meeting of the 16th Dec2021
Date: 13 December 2021 21:03:41

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

To the NLWA clerk

Please process my application to speak at the NLWA meeting regarding item 10 that seeks to approve contracting with Acciona for the Edmonton incinerator.

The main point I want to make is that the councillors making the decision have not been made aware of the actual carbon emissions that will result from this decision for many years – past when global warming has made life intolerable for North London residents.

I would urge the councillors who represent the 7 Boroughs to consult reliable information about carbon emissions from food and garden waste. In particular to be aware that the NLWA chose to follow outdated IPCC advice to discount emissions from biogenics, contrary to the latest IPCC advice. I'll also point out that North London could provide exemplar handling of waste at a much lower cost and demonstrate that, together with North London residents the NLWA could showcase an actual low carbon handling of waste.

This will require NLWA to Pause and Review the low carbon options that previously they have dismissed with inadequate investigation.

My credentials are as a long time campaigner in Haringey on low carbon topics and as a previous professional in BT on enabling major projects to have sound procurement services. I am a member of Haringey Labour Climate Action group, where very many of the members are very conversant with the issues around the disposal of waste and support my position.

My contact details are: Mrs Sydney Charles, [REDACTED],
[REDACTED] and [REDACTED] I will be doing this as an individual.

Regards

Mrs Sydney Charles
[REDACTED]

This page is intentionally left blank

Deputation – 16th of December 2021

Deputation by Dr. Rembrandt Koppelaar as an independent expert

Email: [REDACTED]

Dear board members of the North London Waste Authority,

It is a privilege to address you today. I am a resident of Hackney, and today I am speaking to you as an independent expert from the public. I am also a founder of Extinction Rebellion Zero Waste, a role in which I have been active in lobbying the UK government to set more ambitious circular economy legislation, including exchanges with the secretary of state of DEFRA, George Eustice. In my paid daywork I develop digital innovations with manufacturers such as Bosch, and recyclers such as Reydesa, a company which operates the largest copper and aluminium smelters in Europe. I also work with councils in England in Essex and Kent to drive their recycling forward.

I am speaking to you today to bring to your attention two key matters in relation to agenda item 10, the decision for the procurement of the North London Heat and Power Project Energy Recovery Facility.

Firstly, in the procurement report under item 5.19 the claim is made that the net CO₂ emissions from the facility after offsetting for the generated electricity and heat, and metals recycling, is approximately 28.000 tonnes per annum. This following the calculation process published by the Department for Environment, Food and Rural Affairs (Defra) in 2014.¹ This methodology is based on the practice that the incinerator changes the marginal electricity need on the grid for which a natural gas power plant is taken as a reference. In other words, by turning on the incinerator it implicates turning off a natural gas power plant and vice versa. **This methodology has recently been revised by the Department for Business, Energy & Industrial Strategy (BEIS).** An update that the North London Waste Authority is not yet aware of. **I set out below that the net emissions of the plant based on the revised guidance would be 210,700 tonnes of CO₂ and not 28.000 tonnes per annum.**

Since October 2021 there has been an updated guideline for these calculations published by the Department for Business, Energy & Industrial Strategy (BEIS). The new guidance 'Valuation of energy use and greenhouse gas'² underpins HM Treasury Green Book, the guidance reference on how to appraise and evaluate policies, projects and programme. In the new BEIS guidance a natural gas power plant should no longer been taken as the reference in a rapidly decarbonising electricity grid.³ Instead,

1

<http://sciencesearch.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=19019>

² See

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1024040/valuation-energy-use-greenhouse-gas-background-documentation.pdf ;
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1024043/data-tables-1-19.xlsx

³ From the BEIS report "The calculations are based on the assumption that, until very recently, a Combined Cycle Gas Turbine (CCGT) plant was the long-run marginal electricity generation plant on the basis that it was both relatively cheap and quick to build.. However, going forward there are reasons to think that this may not remain the case, particularly given the policies in place to incentivise low carbon electricity generation.... the results of the demand reduction modelling have been used to inform a profile of emissions factors between the CCGT plant in 2010, and the marginal emissions factor modelled in 2030. A moving average of the results suggests broadly an increasing rate of decline in the emissions factors over this period."

a declining marginal emissions factor needs to be taken into account, in line with the expected complete decarbonisation of the grid in the 2030s. The report is published with a series of grid average emission factors that should be used for emissions footprint calculations.

The new grid average marginal emissions factors set by BEIS are substantially lower than that of a natural gas power plant at 373 grams of CO₂ per kWh of electricity produced which is still taken as a reference by the NLW under item 5.19. The new emission factors for industry are 74 grams of CO₂ per kWh for 2027, the year in which the new NLHPP would become operational, 51 grams of CO₂ per kWh for 2030 and 24 grams per kWh for 2035, trending downwards to zero in subsequent years.

If we now go back to the figures quoted by the NLWA of 28,000 tonnes of net CO₂ emissions. These are based on the calculations from the consultancy Ramboll, which was commissioned by the NLWA in 2019 to evaluate the net emissions of the Energy Recovery Facility, and redo their calculations from today with the new BEIS emissions factors for offset calculations. In this case the average emission factor to be used across the lifetime of the facility. Based on a conservative view on the lifetime of the facility from 2027 to 2050 this results in an average emissions factor of 25 grams of CO₂ per kWh.

The resulting outcome is that the net emissions of the plant are 210,700 tonnes of CO₂ (Table 1), based on Ramboll’s methodology using the updated emissions factor based on the guidance from BEIS. Note that this does not include any changes to heat generation offset which is currently based on an assumed replacement of gas boilers. In an increasingly decarbonised heat supply from heat pumps that run on decarbonised electricity, also this offset will become smaller in the future.

Table 1. Comparison between Ramboll calculations and results with new BEIS emission factors

	Ramboll 2019 calculations with natural gas power plant offset	New calculations as described above with BEIS emission factors for offset
Total fossil emissions from the Energy Recovery Facility calculated by Ramboll	317,905 tonnes of CO ₂	317,905 tonnes of CO ₂
Electricity generation offset	-195,825 tonnes of CO ₂	-13,125 tonnes of CO ₂
Heat generation offset	-66,080 tonnes of CO ₂	-66,080 tonnes of CO ₂
Metals recycling offset	-28,000 tonnes of CO ₂	-28,000 tonnes of CO ₂
Net emissions result	28,000 tonnes of CO₂	210,700 tonnes of CO₂

Secondly, instead of incinerating the plastics we should in North London develop the UK’s most advanced sorting and recycling facility as part of the NLHPP EcoPark. To recover the plastics from our black bags and recycle them and turn waste into a profit. In the procurement report under item 5.7 it has been claimed that this is not yet possible. That materials recovery facilities for residual wastes have not been successful at very large scale.

As an unsuccessful example to underpin this claim that the technology does not work, the Recycling and Energy Recovery Facility in Leeds built by Amey Cespa is mentioned. Facilities from Amey Cespa in the UK indeed not been successful in extracting plastics out of the residual waste, mostly because they have not been designed with the right technology to do so. The facilities built by Amey Cespa lack substantial modern optical sorting capabilities to separate out different types of plastics, thereby creating a low-quality output that is not sellable on recycling plastics markets. And they also lack cold and hot washing approaches with further sorting for purification.

The modern way to ensure purity plastics is via extensive optical sorting to create material streams with different kind of plastics. The plastics are then shredded to create plastic flakes, cold and hot

washed to improve purity, and further optical sorting to receive 98% purity plastics. This is how it is done – today – in Norway, at the IVAR LKS facility, where 82% of the plastics from black bags since 2019 are recovered and turned into plastics.ⁱ The IVAR LKS facility includes 22 optical sorters to generate 5 plastics streams and 3 paper & card streams of high purity. It is operational today and is a success story.

Similar facilities in the Netherlands manage to recover between than 50% and 80% of the plastics from the residual waste. These include the Rotterdam Rozenburg 430,000 tonne facility and Amsterdam AEB facility, and the Wijster Groningen 800,000 tonne facility. These facilities are operational today and are also success stories in that they prevent the majority of plastics from incineration and instead redirect it to recycling. The Wijster facility operates at a capacity that is large enough for North London's waste streams. These facilities have 12 or more optical sorters to produce 5 streams of plastics, and they are connected to integrated plastics recycling facilities, such as the Plastic Recycling Amsterdam facility.⁴ There hot and cold washing with further optical and innovative magnetic sorting technologies create plastics flakes at 99% purity. The Amsterdam AEB facility initially had some challenges, but its operator has solved many issues and as of 2021 it is recovering the majority of plastics, metals and drink cartons from the residual waste stream. It now takes the majority of plastics wastes out of the residual stream and reduces the overall residual waste stream by 12.5%.⁵ Further increases will be possible to 25% with improvements of the recovered paper & card for which there is currently is no market in the Netherlands.

The UK is home to an even more advanced facility in Northwich, operated by Orsted.ⁱⁱ This 80,000 tonne facility recovers up to 70% of the residual waste. It uses an using enzymatic washing process to separate the organics from non-organics. The organics are then sent to an anaerobic digester for biogas and digestate production. The non-organic residual waste components including plastics, metals and drink cartons cleaned in the same step, after which these are sorted and purified so they can also be sold on the market.

The reasons are compelling to build the UK's most advanced facility for the sorting and recycling facility for plastics from black bag waste at the EcoPark.

- As of April 2022 there will be a tax in place on any producer or importer of unrecycled plastics packaging of 200 pounds per tonne, with less than 30% recycled plastics content. A similar tax is already in place in the European Union at a level of 800 euro per tonne. Providing guaranteed market stability.
- There is a large economic value in high purity colour sorted plastic flakes. On an annual basis North London's plastic from black bag waste, when sorted and recycled, has based on current market prices of 430 pounds per tonne for plastic flakes, a value of 35 million pounds in flake form, and on prices around 870 pound per tonne in pellet form, a 70 million pounds value as plastics pellets.ⁱⁱⁱ The higher economic potential is equivalent to what all North London boroughs - combined - will pay for the incineration of wastes.
- It is the fastest way to reduce the carbon footprint from the incineration facility. Plastics cause around 70% of the fossil carbon emissions from waste incineration.^{iv} By removing as much plastics as possible prior to incineration, the carbon footprint of and energy from waste facility

⁴ <https://www.plasticrecyclingamsterdam.nl/en/>

⁵ <https://afvalonline.nl/uitgaven/blad?id=204>

can be reduced to close to zero on a net emissions accounting basis, even without the costly and unproven addition at large scale of carbon capture and storage.^v

- It will improve the overall air quality from the Energy from Waste incinerator as the incineration of plastics is one of the main causes of pollutants in incinerators. Next to textiles and furniture that contain substantial volatile organic compounds. The recovery and recycling of plastics is a source solution instead of an end-of-pipe air pollution solution.
- Creating a local North London facility would ensure that no plastics are exported and we work on self-sufficiency for recycling in North London.

For these reasons, on the basis of my expert opinion. I strongly recommend the addition of an integrated sorting and plastics recycling to the EcoPark before advising any NLWA board member to consider moving forward. To take a further step to realise the vision as set out by the chair of the North London Waste Authority, Cllr Clyde Loakes who voiced on 18 May of this year that 'It is unconscionable that plastic waste generated in the UK is being sent to countries with minimal means to deal with it...The UK must deal with its own waste locally, not just for ethical reasons and to help combat the climate emergency but also because of the economic opportunities for the UK as it progresses to a more circular economy.'^{vi}

I propose to the NLWA board to do exactly this, by ensuring **that the North London Waste Authority seriously looks at redesigning the NLHPP EcoPark to include the pre-sorting and recycling of plastics prior to incineration, as part of a pause and review of the NLHPP project.** The steps that the NLWA can undertake to evaluate this opportunity include:

- **Operational study:** To carry out site visits to a number of mixed residual waste recovery plants including the Orsted operated facility in Northwich England, the de Wijster facility in Groningen the Netherlands, the IVAR LKS facility in Forus Norway, and the Amsterdam AEB facility and plastics recycling plant.
- **Technical feasibility:** To carry out a real-world test in collaboration with TOMRA's at one of their optical sorting test centre's with full capabilities using the residual waste from London. This to evaluate the potentials for the recovery of plastics and the purity that can be obtained based on North London's waste composition.^{vii} On average it takes between 8 to 10 weeks from first meetings to test completion and reporting.
- **Economic feasibility:** A techno-economic cost benefit analysis for the inclusion of an integrated plastics recovery and recycling plant in North London in the ECoPark. Taking into account the UK and EU plastics packaging tax and other relevant UK legislation that will influence the recycled plastics market.

ⁱ <https://recycling.tomra.com/blog/mixed-waste-sorting-ivar-iks-norway>

ⁱⁱ https://orsted.co.uk/energy-solutions/renescience?gclid=CjwKCAiA-9uNBhBTEiwAN3IINM7RUq-6d8hgW3pQBhle3m9On0r7ve8Dd0CSeD2IznoCnZgis0M9exoC_qgQAvD_BwE

ⁱⁱⁱ Based on 80,000 tonne of plastics and market prices from plasticker for the international recycled plastics market - https://plasticker.de/preise/preise_monat_en.php?group=gran

^{iv} <https://www.viridor.co.uk/who-we-are/latest-news/2021-news/viridor-launches-plan-to-achieve-zero-export-of-plastic-waste/>

^v <https://www.eunomia.co.uk/reports-tools/waste-in-the-net-zero-century-greenhouse-gas-impacts-of-mixed-waste-sorting/>

^{vi} <https://www.nlwa.gov.uk/news/100-north-londons-household-recycled-plastic-processed-uk-government-must-support-rest-uk>

^{vii} <https://recycling.tomra.com/blog/test-before-invest-tomra-sorting-technologies>

This page is intentionally left blank

I am making my written submission to the North London Waste Authority on behalf of my constituents in Edmonton, based on the concerns that have been consistently raised with me by local residents ever since I was elected as the Member of Parliament. Due to the concerns that I will elaborate on below I call on the NLWA, before awarding the contract for the rebuild of the incinerator, to urgently pause and review the North London Heat and Power Project, and to commission an independent review of the project.

It's essential that new evidence is taken on board regarding this project considering that the original public consultation concluded a whole six years ago. Scientific and public knowledge of the health impacts of air pollution has significantly developed since that time, as has awareness of the wider environmental impacts, which means it is time to look again. Therefore, I want to raise several concerns.

First, my constituents and I are concerned about the public health impact of rebuilding the incinerator. The Government's 2019 Clean Air Strategy called air pollution the top environmental risk to health in the UK (1). A study by Kings estimated that air pollution kills up to 36,000 people a year in the UK, while in inner London boroughs exposure to air pollution has been found to reduce the size of children's lungs by 5% (2). On this very day last year an inquest found that air pollution was a cause of death of Ella Adoo-Kissi-Debrah, a nine-year-old girl from Lewisham (3). These devastating impacts of air pollution should be absolutely central to the consideration of rebuilding the Edmonton Incinerator.

This is why we should be seeking to move away from incineration as a method of waste management. A study commissioned by the Greater London Authority found that London's five existing Energy from Waste facilities alone can be attributable to the deaths of 15 Londoners per year (4). Yet, the NHLPP will only expand the capacity of the incinerator. The World Health Organisation has stated for many years that there is no safe limit for particulate matter and that any amount will be detrimental to human health, especially the ultra-fine PM2.5 type. The WHO has guidelines on the limit of particulate emissions to reduce if not eliminate health risks. For fine particulate matter (PM2.5) their guideline is 5 micrograms as an annual mean and for coarse particulate matter (PM10) the annual mean should have a limit of 15 micrograms (5).

Air Quality Reports have shown PM10 monitoring sites near the old incinerator have recorded consistently higher recordings than that west of

Edmonton and would exceed the WHO's guideline limits designed to safeguard public health. Enfield Council does not have a monitoring site for PM2.5, a more damaging finer particulate, and just two sites for monitoring nitrogen dioxide across Edmonton (6). By expanding the incineration capacity locally and continuing with hugely damaging polluting practices NHLPP will only contribute to higher rates of respiratory and cardiovascular diseases, Alzheimer's and premature death.

Secondly, my constituents and I are concerned about the inequalities in health outcomes that this incinerator will only exacerbate.

It is unjust for the seven local authorities; Enfield, Barnet, Camden, Hackney, Haringey, Islington and Waltham Forest to transport huge amounts of waste to a densely populated area of London (5).

It's not that just that my constituency is densely populated, but the wards of Edmonton Green, Upper Edmonton and Lower Edmonton which all make up part of my constituency, are among the most deprived wards in the country. People from Black Asian and Minority Ethnic backgrounds also make up 60% of the population in these areas (7).

Thirdly, my constituents have raised concerns about how this project, which is projected to emit up to 700,000 tonnes of carbon dioxide a year, can be tallied with the far more ambitious climate targets that the UK has adopted at both national and local level since this project was first planned, particularly the net zero target of 2050. We know that councils covered by this scheme, as well as the national Government have declared a climate emergency and recognised the scale of the issue that we face with these declarations.

Yet, it is concerning that the seven local authorities are further locking themselves into many more years of high-levels of incineration, particularly as they already have comparatively low recycling rates of around 30%, compared to a UK average which sits at 45.5% for England (8). Incinerators typically have lifespans of 20 to 30 years and I would assume that considering the considerable capital expenditure being put into the project that the intent is to maximise its usage.

While energy sourced from Energy to Waste means may have once been less carbon intensive than alternative methods such as coal, there has been a considerable expansion in renewable technology and a decline of the most polluting forms of energy generation in recent years. The intention of all major political parties is that this will only increase in years to come, and as such undermines massively the case for scaling Energy from Waste. It's time

to adapt to the times in which we find ourselves in and reconsider this plan which has come to look outdated.

In summary, it's absolutely essential for the interests of the people of Edmonton and the surrounding areas that the NHLPP is subject to a pause and review process and that the contract for rebuilding the Edmonton Incinerator is not granted today. This independent review should be commissioned as soon as possible and look at the vast array of new evidence and developments in waste management and energy production that has occurred since the original plans for the NLHPP were drawn up many years ago.

Moving forward with this project risks harming public health, exacerbating economic and racial inequality as well as stalling progress towards tackling the urgent crises of air pollution and climate change.

My constituents and I merely ask you that you do the right thing for Edmonton, North London and more widely the whole world.

References

1- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf

- 2- <https://www.kcl.ac.uk/news/air-pollution-restricting-childrens-lung-development>
- 3- <https://www.bbc.co.uk/news/uk-england-london-55330945>
- 4- https://www.london.gov.uk/sites/default/files/gla_efw_study_final_may2020.pdf
- 5- [https://www.who.int/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health](https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health)
- 6- <https://new.enfield.gov.uk/services/environment/air-quality-status-report-environment.pdf>
- 7 - <https://new.enfield.gov.uk/services/your-council/borough-and-wards-profiles/about-enfield-information-lower-edmonton.pdf>
- 8- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1002246/UK_stats_on_waste_statistical_notice_July_2021_accessible_FINAL.pdf

From: [nick.earl](#)
To: [Cheryl.Hardman](#)
Subject: Incineration
Date: 13 December 2021 21:12:17

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

As a N London resident I would like to ask if the NLWA is aware that the World Health Organisation has stated that, globally, incineration is no longer a sustainable process on grounds of health alone?

If the proposed renewal proceeds have the authority quantified the londonwide cost impact to the NHS over the projected life of the facility? Thank you

Nick Earl



Sent from my iPhone

This page is intentionally left blank

From: [Tania Inowlocki](#)
To: [Cheryl Hardman](#)
Subject: Request to make a deputation to the North London Waste Authority on 16 December 2021
Date: 13 December 2021 21:52:17

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Cheryl,

Please accept the deputation request for Prof. Vyvyan Howard below. Please send any correspondence to me.

All best,
Tania

Request to make a deputation to the North London Waste Authority on 16 December 2021
Submitted to Cheryl Hardman at cheryl.hardman@camden.gov.uk on 13 December 2021

Summary

Noted medico-toxicologist Prof. Vyvyan Howard would like to make a deputation to the North London Waste Authority on 16 December 2021 regarding the planned construction of a new incinerator in Edmonton, in the borough of Enfield.

The deputation follows NLWA claims that downplay the health risks associated with toxic emissions from the proposed plant. Prof. Howard will review the health risks associated with even the most advanced abatement technology, since efficiency drops for particulate matter with the smallest mass, which is also the most hazardous to human health. He will touch on issues such as de novo synthesis (which occurs after the gases have left the smokestack) and dioxins released by incinerators, most of which end up in toxic bottom ash. Even the most advanced plant will only add to local air pollution exceedances from other sources. Prof. will underscore the World Health Organization's finding that there is no safe level of exposure to ultrafine particulate matter.

The NLWA board members have an opportunity to minimize toxic emissions and related health risks, as London will have enough surplus energy-from-waste incineration capacity to treat north London's waste even if the proposed Edmonton incinerator remains unbuilt. They can choose to steer north London's waste management strategy towards a more circular economy, thereby removing incineration-related toxins from densely populated Edmonton, one of the country's most deprived areas. Such a shift would also be in line with the Climate Change Committee's call to move away from the linear economy: "Achieving significant emission reductions in the waste sector requires a step-change towards a circular economy, moving away from landfill and incineration (and the associated methane and fossil CO₂ emissions), and towards a reduction in waste arisings and collection of separated valuable resources for re-use and recycling" (see p. 183 on <https://www.theccc.org.uk/publication/reducing-uk-emissions-2020-progress-report-to-parliament>).

The deputation will encourage NLWA board members to 1) call for a pause of the procurement process and 2) commission an independent review of the North London Waste Authority's plans to build a 700,000-tonne energy-from-waste incinerator in Edmonton.

Person who wishes to address the NLWA board

- Prof. Vyvyan Howard, [REDACTED]

Thank you for considering this matter. Should the deputation be approved, please provide this deputation request to all members of the NLWA board before the meeting on 16 December.

From: [Cllr Charith Gunawardena](#)
To: [Cheryl Hardman](#)
Subject: Request to make deputation to NLWA on 16 Dec 2021
Date: 14 December 2021 00:09:10

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Cheryl

Summary

I, Enfield **Cllr Charith Gunawardena** would like to make a deputation to the North London Waste Authority on 16 December 2021 regarding the planned construction of a new incinerator in Edmonton, in the London Borough of Enfield.

My proposed deputation covers two aspects in relation to the procurement of the Energy Recovery Facility:

- 1) Failure modes and effects analysis of the procurement process undertaken by the local councils.
- 2) The due diligence process being followed by boroughs on their financial exposures of around £200m, each in relation to this procurement .

Person who wishes to address the NLWA board:

Cllr Charith Gunawardena, M.Phil., MBA
Enfield Green Party
Member of Environment and Climate Action Scrutiny Panel

please send any correspondence to: Cllr.Charith.Gunawardena@Enfield.gov.uk

Thank you for considering this matter. Should the deputation be approved, please provide this deputation request to all NLWA board members before the meeting on 16 December.

Kind Regards

Cllr Charith Gunawardena

Southgate Ward
London Borough of Enfield
Phone: [REDACTED]
Mobile: [REDACTED]

Surgery Details:

- Southgate Library, High Street, Southgate, London N14 6BP
Currently suspended due to COVID-19

- Monthly Midweek Surgery: Various venues. BY APPOINTMENT ONLY

Corona Virus Public Information

<https://new.enfield.gov.uk/news-and-events/coronavirus-public-information/>



[Follow us on Facebook](#)

[Twitter](#)

www.enfield.gov.uk

Enfield Council is committed to serving the whole borough fairly, delivering excellent services and building strong communities. Opinions expressed in this email are those of the individual and not necessarily those of the London Borough of Enfield. This email and any attachments or files transmitted with it are strictly confidential and intended solely for the named addressee. It may contain privileged and confidential information and if you are not the intended recipient and receive it in error you must not copy, distribute or use the communication in any other way. All traffic handled by the Government Connect Secure Extranet may be subject to recording/and or monitoring in accordance with relevant legislation.

This email has been scanned for viruses but we cannot guarantee that it will be free of viruses or malware. The recipient should perform their own virus checks.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

From: [m_stow](#)
To: [Cheryl Hardman](#)
Subject: Re: Deputation request to NLWA AGM Thursday 16th December 2021
Date: 14 December 2021 09:51:52
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.jpg](#)

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Good morning Cheryl. I intend to present the 4 point alternative to the new incinerator 1. waste recycling fund 2. Mixed recycling facility at Ecopark 3. Waste reduction and reuse. 4. Reduced minimum residual waste included in whole London waste management strategy. Thank you. [REDACTED]

Get [Outlook for Android](#)

From: Cheryl Hardman <Cheryl.Hardman@camden.gov.uk>
Sent: Tuesday, December 14, 2021 7:52:49 AM
To: m stow [REDACTED]
Subject: RE: Deputation request to NLWA AGM Thursday 16th December 2021

Dear Malcolm

Thank you for your email. Do you have a fuller deputation statement or does the email below cover the subject you wish to discuss?

Regards

Cheryl

Cheryl Hardman
Principal Committee Officer

Telephone: 020 7974 1619



If you have asked to make a deputation or a written submission to a Committee, please see our Privacy Notice [here](#) which tells you how we store and process the data we hold about you and residents.

The majority of Council staff are continuing to work at home through remote, secure access to our systems. Where possible please communicate with us by telephone or email.

From: m stow [REDACTED]
Sent: 13 December 2021 20:57
To: Cheryl Hardman <Cheryl.Hardman@camden.gov.uk>
Subject: Deputation request to NLWA AGM Thursday 16th December 2021

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Cheryl,

I am requesting to make a deputation to the NLWA AGM in regard to: the clear cheaper, safer and healthier alternative to energy from waste and overall waste management that is available to the board; the importance of this alternative being presented accurately and openly to the board before any irreversible decisions are made; the need for pause and review of the energy from waste project, to allow the alternative case to be made, for informed decisions in the interests of all the councils together represented on the board and the 2.1 million residents of the 7 boroughs, financial, health and safety concerns of future generations.

Malcolm Stow

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Sent from [Mail](#) for Windows

This e-mail may contain information which is confidential, legally privileged and/or copyright protected. This e-mail is intended for the addressee only. If you receive this in error, please contact the sender and delete the material from your computer. See our new Privacy Notice [here](#) which tells you how we store and process the data we hold about you and residents.

From: [Iain Thomson](#)
To: [Cheryl Hardman](#)
Subject: Deputation for 16th December meeting
Date: 10 December 2021 13:23:33
Attachments: [image001.jpg](#)

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Hi Cheryl,

As per NLWA's procedures, I wish to submit a deputation to the 16th of December meeting.

My deputation, to be addressed to all Members, is a simple one:

"Is it in the best interests of North London's residents for a major contract to be awarded based upon a tender score of just 36 out of 100, a score that would be classified as a 'fail' for the overwhelming majority of public procurement exercises?"

I look forward to hearing from you.

Thanks

Iain



This page is intentionally left blank