

21 April 2020

Dear Extinction Rebellion of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest, with Extinction Rebellion London,

**Response from the North London Waste Authority and North London's boroughs to Extinction Rebellion's Letter (dated 11 March) about the North London Heat and Power Project**

This letter represents a full and comprehensive response by the North London Waste Authority (NLWA) and its seven constituent boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest to a letter from Extinction Rebellion (dated 11 March 2020), which asks that the North London Heat and Power Project (NLHPP) be paused.

The project which is being taken forward was developed after careful consideration of many options over several years. It was subject to extensive public engagement, consultation and then to an examination in public. This included hearings before an independent Inspector who considered the 2,127-page Environmental Statement which accompanies the project. The Inspector recommended to Government in November 2016 that the project should be approved, and Government accepted this recommendation in February 2017.

Securing long-term services for over two million residents requires careful and responsible planning, thorough analysis, detailed preparation and highly skilled delivery. The North London Heat and Power Project is being taken forward on this basis. It aligns with coordinated action between the boroughs to promote the circular economy. It contributes to tackling the Climate Emergency by reducing the requirement to use landfill in the future. And, by supplying heat and power, it provides low-carbon energy in line with the Mayor's Environment Strategy for London and the Committee on Climate Change's ambitions to achieve carbon neutrality.

By contrast, the proposals put forward in the Extinction Rebellion letter of 11 March do not add up to a feasible plan. While the letter makes many points, the simple facts are that **(a) it misrepresents the project that we are taking forward (b) proposes untested and unrealistic alternatives and (c) completely fails to recognise the financial, environmental and health risks they would cause.** Pausing the project would be irresponsible, risking up to 700,000 tonnes of non-recyclable waste being sent to landfill in the future. This would have hugely damaging environmental consequences from the impact of its transportation, through to its actual landfilling and the severe environmental consequences of its gradual decomposition over many, many years.

At the time the Extinction Rebellion letter was written, the UK had recorded just 382 cases of Coronavirus, and the total cases logged globally was under 120,000. Since then, the spread of the virus, the disruption to the economy and the risk to public services highlights that the prime responsibility of councillors serving the public must at all times be to provide responsible, effective solutions which safeguard our communities from social, health and environmental risks. The North London Heat and Power Project meets exactly these requirements.

Detailed responses to individual themes in the 11 March letter are provided below. **We are clear that we must not take a reckless gamble with the delivery of essential services for north Londoners. The North London Heat and Power Project continues therefore to be the only sustainable and responsible solution.**

**Concerns have been raised about the project’s environmental impact. We are clear that the NLHPP is a vital investment in sustainable waste infrastructure for the future.**

- **North London’s boroughs have declared Climate Emergencies. We are taking urgent action across our boroughs to combat the climate crisis.** We are acting now to reduce waste, increase recycling rates and treat non-recyclable waste as a resource.
- **The NLHPP is part of north London’s overarching waste strategy, which focuses on waste prevention and recycling.** Our recycling contracts cover the widest range of materials in the country, meaning our residents have the maximum opportunity to recycle. We also provide a network of public reuse and recycling centres for items that cannot be recycled in household collections.
- **We run the most extensive range of outreach activities in London (and probably in England) to increase recycling.** This includes interventions on estates, major efforts to maximise the UK processing of recyclable plastics and trialling reverse vending machines for cans and bottles to drive up ‘on the go’ recycling. We also run an award-winning programme of waste prevention projects. This includes our recently launched ‘Low Plastic Zones’ – the country’s first – to encourage businesses and communities to cut down on single-use plastics, as well as our community fund for local groups working to prevent waste. Our London Upcycling Show in November 2019 hosted over 350 attendees, bringing together people from across London to celebrate and share knowledge on the craft of upcycling, reuse and repair. Our Swish and Style events – some of the first in the UK and still London’s largest clothes swaps – are helping to set the agenda on the reuse and repair of unwanted items of clothing.
- **As part of the NLHPP, we are investing in flagship recycling facilities at the Edmonton EcoPark, including a new state of the art Resource Recovery Facility to extract additional wood, plastics and metal for recycling.** We are building a new hub, called EcoPark House, for local communities to learn more about the circular economy. And we are proud to be adding to our network of public Reuse and Recycling Centres with a new one at the EcoPark, for the benefit of local communities.
- **The reality is that, even if recycling rates increase significantly in the future, there is still an urgent need to plan responsibly for the waste that can’t be recycled.** Our drive to reduce waste and increase recycling goes hand in hand with the provision of modern, sustainable waste infrastructure, which will be amongst the most advanced in the UK and Europe. Even if north London’s recycling rates reach our target of 50 per cent – or even exceed it – compared to around 30 per cent today, there will still be residual waste to treat, and it’s simply not acceptable in a Climate Emergency to bury this in landfill. Landfill reduction is a policy imperative for the NLWA, the EU, UK Government and the GLA.
- **The NLHPP is instrumental to tackling the Climate Emergency. Failure to build this world-class project in line with the planned timescales will risk the waste from over two million north Londoners being sent to rot in landfill.** The existing energy from waste plant at Edmonton EcoPark is coming to the end of its life and needs to be replaced. It is the oldest facility of its type in London and one of the oldest in Europe, and we cannot delay action to replace it in order to safeguard a sustainable future for north London’s non-recyclable waste.

**The new Energy Recovery Facility (ERF) will tackle the Climate Emergency by minimising the environmental impact of non-recyclable waste**

- **The NLWA has a statutory duty to dispose of the non-recyclable waste produced by north London’s residents.** By 2050, we need to be prepared to manage 700,000 tonnes of this waste every year. All waste contains carbon, and any way of disposing of it will produce greenhouse gases that will contribute towards climate change. Our task is to reduce and minimise that impact.

- **The most effective way to reduce the climate impact of waste is to not produce it in the first place.** That is why the NLWA works tirelessly to help our communities reduce waste, through a variety of campaigns and educational initiatives. Our #BinYourNappy campaign is achieving extensive media coverage to highlight the scourge of recycling contamination, and is helping to drive much-needed behavioural change in north London. The NLWA has led and run extensive lobbying campaigns over many years to call on Government to introduce strong and meaningful action on packaging. This includes measures which will allow for the introduction of a deposit return scheme and which involve producers taking greater responsibility for the costs of dealing with their packaging.
- **Yet the fact remains that we need a responsible plan for dealing with the challenge of non-recyclable waste in the future.** It is imperative in this time of Climate Emergency that we minimise the environmental impact of waste disposal. As a single waste authority, we cannot control the fact that waste contains carbon. But we can choose solutions that minimise its impact.
- **There are several options for waste disposal, all of which were considered in detail by the NLWA. A major advantage afforded by energy recovery is that it treats non-recyclable waste as a resource for society.** Combusting waste is a safe and reliable method for disposal. It avoids the generation of methane that occurs in landfill, when waste is buried and left to rot – simply passing the problem to future generations. And, crucially, energy recovery also generates low-carbon heat and power.
- **The new ERF at Edmonton EcoPark will generate enough energy, in the form of heat and power, to serve the needs of up to 127,000 homes** – equivalent to more than all the households in Waltham Forest. None of the suggested or previously considered alternatives provide this benefit. The ERF will replace more carbon intensive alternatives for generating energy, such as power plants that burn virgin fossil fuels. The ERF will be part of the UK's efforts to decarbonise its energy supply and help speed north London towards Net Zero. It will be one of the first ERFs in London to provide district heating, helping to unlock the sustainable development of thousands of new homes at Meridian Water in Enfield.
- **The claim that the new ERF will release 700,000 tonnes of carbon dioxide each year is misleading in understanding the climate impact of north London's waste;** in fact, the ERF will be a major part of tackling the Climate Emergency and the most sustainable way of treating non-recyclable waste in north London. The climate impact of the new facility is equivalent to 28,000 tonnes of carbon dioxide when treating 700,000 tonnes of non-recyclable waste<sup>1</sup>. The carbon impact is so low because the ERF will (a) prevent methane generated in landfill (b) displace more carbon-intensive energy generation, like natural gas power plants and (c) enable metals left after the combustion process to be recycled (in 2018/2019 alone, 18,500 tonnes of metal was recovered for recycling at Edmonton EcoPark).
- **In comparison, the climate impact of burying 700,000 tonnes of waste in landfill is much greater:** 243,000 tonnes of carbon dioxide equivalents would be generated every year. This accounts for emissions from methane generation and transporting waste outside of London.
- **The climate impact of using our new facility is therefore equivalent to a 215,000-tonne carbon saving when compared to landfill** – which is like taking 110,000 cars off the road every year.

<sup>1</sup> Carbon Impact Screening for Edmonton ERF, <http://northlondonheatandpower.london/media/udfapcyh/nlwa-carbon-impact-study-report-ver-2-f.pdf>

- **The UK waste sector has achieved major greenhouse gas reductions in recent years, but landfill is still by far the main contributor.** The waste sector accounts for around four per cent of total UK greenhouse emissions. Within this 4%, methane, which is principally produced by landfill, accounts for 92% of emissions<sup>2</sup>.
- **Between 1990 and 2017, greenhouse gas emissions from the waste sector fell by 69%<sup>3</sup>. The reduction in landfilling is a key driver behind this.** The waste sector is the only UK sector to outperform its carbon budget obligations, with greenhouse gases falling faster than targeted to help achieve Net Zero.
- **Energy from waste accounts for only 0.05% of total UK greenhouse gas emissions<sup>4</sup>.** Even in London, where there are very few landfill sites and greater use of energy from waste facilities, it is estimated that only 0.76% of emissions come from energy from waste facilities<sup>5</sup>.

**Questions have been raised about the compatibility of energy recovery with higher recycling rates. But evidence from the UK and EU shows that very high recycling rates and energy recovery go hand in hand.**

- **The NLHPP will not create increased demand for waste.** North London's boroughs have ambitions to become London's leading recyclers, which we are driving forward through collecting the widest possible range of items for recycling, as well as leading wide-reaching campaigns to encourage correct recycling. This includes the #BinYourNappy campaign last year, which raised awareness about waste contamination and the importance of correct recycling.
- **Across the UK and EU, the very best recyclers use energy recovery facilities to treat the waste left after recycling.** For example, Germany recycles 68 per cent, recovers energy from 31 per cent its waste, and landfills around 1 per cent. In Austria, recycling rates are 58 per cent, energy recovery 39 per cent, and landfill 2 per cent. In England, authorities with comparatively high recycling rates – including South Oxfordshire, Vale of White Horse and Stratford-upon-Avon – all recycle over 60 per cent, and send the majority of their remaining non-recyclable waste to nearby energy from waste facilities. These local authorities have high green waste volumes which count as part of their recycling percentage; and they have low density populations which means most properties have their own collections. By contrast there is a greater turnover in population in north London, with many boroughs' residents having collective collections (for example in flats) and a reduced access to their own gardens and therefore a low level of weighty green waste.
- **Boroughs have published Reduction and Recycling Plans (RRPs) and are introducing improvements to collections to separate recyclable material as far as possible, and to encourage households to put the right materials in the right bins.** Unlike many London boroughs, north London's boroughs have already fulfilled the Mayor of London's requirements for collecting dry recyclables. The wide-ranging measures in the RRP's will deliver even greater action to support the ambitions set out in the Mayor of London's Environment Strategy.

<sup>2</sup>Department for Business, Energy and Industrial Strategy, 2017 UK Greenhouse Gas Emissions, Final Figures, February 2019  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/776085/2017\\_Final\\_emissions\\_statistics\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/776085/2017_Final_emissions_statistics_report.pdf)

<sup>3</sup>Ibid.

<sup>4</sup> Committee on Climate Change, Meeting Carbon Budgets, June 2013, [https://www.theccc.org.uk/wp-content/uploads/2013/06/CCC-Prog-Rep-Book\\_singles\\_web\\_1.pdf](https://www.theccc.org.uk/wp-content/uploads/2013/06/CCC-Prog-Rep-Book_singles_web_1.pdf)

<sup>5</sup>Report for the Greater London Authority, Greenhouse Gas Emissions Performance Standard for London's Local Authority Collected Waste, May 2017  
[https://www.london.gov.uk/sites/default/files/gla\\_eps\\_update\\_2017\\_final.pdf](https://www.london.gov.uk/sites/default/files/gla_eps_update_2017_final.pdf) and the London Atmospheric Emissions Inventory <https://data.london.gov.uk/air-quality/>

- **North London's boroughs are rolling out additional Low Plastic Zones, new repair cafes and clothes swap events, initiatives to increase recycling on estates, education campaigns to reduce waste contamination, reverse vending machines and installing new water fountains to encourage citizens to cut down on single-use plastics.** Great effort is being made to drive behavioural change. The measures in individual boroughs include reducing the size of residual waste bins to encourage recycling, and moving to fortnightly residual waste collections. Further measures include the use of low-emission and electric waste vehicles to make north London's waste service even more sustainable.
- **North London's boroughs are moving towards higher recycling rates for food and garden waste.** The various measures brought forward by individual boroughs will support the NLWA's campaigns that aim to reduce food waste in the first place – such as the new 'Save our Spuds' initiative. The measures include introducing weekly food waste collections, communal food waste facilities on estates, free home composting kits and separate garden waste collections.
- **However, waste and recycling volumes depend on residents' behaviour.** NLWA has been leading the lobbying of Government to introduce changes which would enable better recycling performance – such as the introduction of a deposit return scheme for bottles and cans, making recycling compulsory and giving local authorities powers to fine residents who do not comply with recycling arrangements. Progress on these issues depends on Government action. It would be irresponsible to assume policy developments can be relied on until there is a clear route map to their implementation.
- **North London's boroughs and the GLA are clear that – even with much greater efforts from residents to increase recycling – the NLHPP will still be essential for London's future waste needs.** The NHLPP goes hand in hand with meeting the GLA's policy of reducing 'avoidable' food waste by 50 per cent by 2030.
- **North London's waste management strategy is in line with the waste hierarchy.** In order, we prioritise prevention, re-use, recycling, composting, recovery (through energy recovery facilities) then disposal (landfill). Landfill is the worst option for the environment, and the NLHPP is essential to prevent its use in the future.

**Concerns have been raised about the project's financial impact. The fact is that the NLHPP represents excellent value for the residents of north London, and is more cost-effective than the alternatives**

- **It is not accurate to claim that the project's costs doubled in 2019.** NLWA has always been clear that the details of the final cost would be determined between 2017 and 2020, after the public consultation for the Development Consent Order had finished and the final designs were decided.
- In 2015, an initial assessment of capital costs for individual facilities was prepared, which focused on a replacement ERF. Within the overall project costs, the ERF remains an estimated investment of £600m. Other facilities – such as the flagship Resource Recovery Facility – have now been developed to the highest, most modern operating standards to enable that greater extraction of matters that can be recycled, alongside a new onsite public Reuse and Recycling Centre, which matches our ambition to ensure more materials are recycled. The project moved into the delivery phase in 2019, and a thorough, robust and reliable estimate of £1.2bn was announced in November. In line with best practice reflected in all major projects at this stage of development, the cost estimate also factors in a prudent approach for managing risks.

- **The project represents excellent value for taxpayers and is more cost-effective than the alternative options.** Delivering the project at the lowest possible cost for north London's residents is imperative. As a public authority, the NLWA is able to borrow from sources such as the Public Works Loan Board, to secure finance at lowest cost possible to the taxpayer. In 2019 the Authority was awarded £100m of borrowing at the Government's Local Infrastructure Rate – allowing borrowing on especially favourable terms for local authority projects which represent high value for money. In the short to medium term, the NLWA forecasts that there will be no significant changes to the levy – which makes up only about three per cent of boroughs' total net expenditure. Each of the seven London boroughs determines the appropriate level of council tax in their areas and this arrangement will continue when the new facility is built.

**Concerns have been raised that the project does not fit in with the development of a circular economy. However, the NLHPP will provide vital infrastructure to support the transition towards a circular economy, with recycling rates that are much higher than today**

- **The Greater London Authority (GLA) is clear that, even if its waste reduction and recycling targets are met, there will still be residual waste that needs to be treated across London in the 2020s and beyond.** The GLA predicts that there will be at least 2.9m tonnes of residual waste from homes and businesses to treat every year in 2031<sup>6</sup>. By the 2030s, older energy from waste facilities are likely to have closed down and none of London's biodegradable waste will be sent to landfill. This reinforces the urgent need to provide sustainable waste infrastructure to avoid a capacity crisis in the near future.
- **The NLHPP is modelled on achieving 50 per cent household recycling rates in north London.** This modelling factors in that the population in north London is expected to increase from 2m to 2.5m by 2050. The NLHPP provides a responsible solution for the waste that cannot be recycled, even when recycling rates are much higher than they are today.
- **If north Londoners achieve recycling rates that are higher than 50 per cent, the facility will be capable of treating waste from other boroughs and businesses,** using state-of-the-art technology that far outperforms London's existing plants. Further information can be found in the Needs Assessment that supported the Authority's Development Consent Order (DCO) application<sup>7</sup>. It is not right to claim that the project has 'expanded' to include the potential to treat waste from outside north London's boroughs. This was made clear during the Development Consent process in the Needs Assessment.
- **The EU, UK Government, GLA and NLWA are absolutely clear that landfill is the worst solution for the environment,** and it is heavily taxed as a result. Energy recovery is vital in the transition towards a carbon neutral future, where landfill simply has no place.

**Concerns have been raised about the project's transparency during the planning process. In fact, the NLHPP was subject to a rigorous and independent planning process, which fully considered environmental factors, alternative options for treating non-recyclable waste and air quality impacts**

- **The project was consented after a thorough analysis of the project's environmental impact.** The consent was granted by the Government in 2017, after the Paris Accord came into effect.

<sup>6</sup> Greater London Authority (GLA) (2017) London Plan Waste Forecasts and Apportionments, Task 3 – Strategic Waste Data

<sup>7</sup> North London Waste Authority, Need Assessment, October 2015, [http://northlondonheatandpower.london/media/rmhdoqgu/ad05-04\\_need\\_assessment\\_lores.pdf](http://northlondonheatandpower.london/media/rmhdoqgu/ad05-04_need_assessment_lores.pdf)

- **The NLWA welcomes the increased awareness from the public about climate issues.** That is why an extensive Carbon Impact Report was published by the NLWA to provide detailed information about the carbon considerations associated with the project. A summary of the report is provided in page three of this letter.
- **The NLHPP is fully compatible with Net Zero.** The Committee on Climate Change is clear that landfill needs to be reduced as a precondition to achieving carbon neutrality<sup>8</sup>. The energy recovery facility will also generate low-carbon heat and power to displace virgin fossil fuels.
- **The NLHPP obtained a Development Consent Order (DCO) from the Government in 2017, which is the most rigorous planning process in the UK. The consent was supported by a 2,127-page, publicly available Environmental Statement.** This comprehensive and wide-reaching document provides the findings from the project's Environmental Impact Assessment, which was carried out by some of the world's leading technical experts. The detailed analysis covers:
  - Air quality and odour
  - Daylight, sunlight and overshadowing
  - Environmental wind
  - Noise and vibration
  - Transport
  - Archaeology
  - Ecology
  - Ground conditions and contamination
  - Socioeconomics
  - Water resources and flood risk
- **The NLHPP carried out an extensive Air Quality Impact Assessment as part of the DCO<sup>9</sup>.** The Assessment considered all the relevant emissions related to the energy recovery process. This includes oxides of nitrogen; carbon monoxide; volatile organic carbons; sulphur dioxide; particulate matter and fine particulate matter; hydrogen fluoride and hydrogen chloride; ammonia; dioxins and furans; trace metals (lead, arsenic, cadmium and nickel); and benzo(a)pyrene. The study modelled the 'worst case scenarios' of emissions from the facility – levels that in reality are likely to be much higher than in actuality.
- This published analysis shows categorically that no concentrations of pollutants from the facility will breach any air quality or public health standards.
- **The NLWA is investing in the very best technology to clean, capture and control emissions.** It will be the first facility in the UK to invest in Selective Catalytic Reduction to reduce emissions of NOx – the same technology used in the world-class Amager Bakke facility in Copenhagen. The NLHPP will also be one of the first facilities in the UK to use a combined wet/dry flue gas cleaning – the best-in-class technology for controlling acidic gasses, heavy metals, organics, furans, particulates and dioxins.
- **The NLHPP will use best-in-class, proven technology for controlling particulates.** Thousands of baghouse filters will be employed to capture particulates, including PM10, PM2.5 and fine particles. The UK's Air Quality Expert Group states that "there have been numerous studies of municipal waste incinerators which show highly effective removal of UFP [ultrafine particles] by their pollution control systems".<sup>10</sup>

<sup>8</sup> Committee of Climate Change, Net Zero, the UK's Contribution to Stopping Global Warming, May 2019, <https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf>

<sup>9</sup>North London Waste Authority, Health Impact Literature Review, November 2014, <http://northlondonheatandpower.london/media/ofrhskwl/141117-nlwa-health-impact-literature-review-consultation-v1.pdf>

<sup>10</sup> Air Quality Expert Group, Ultrafine Particles in the UK, 2018, [https://uk-air.defra.gov.uk/assets/documents/reports/cat09/1807261113\\_180703\\_UFP\\_Report\\_FINAL\\_for\\_publication.pdf](https://uk-air.defra.gov.uk/assets/documents/reports/cat09/1807261113_180703_UFP_Report_FINAL_for_publication.pdf)

- **Across the UK, energy from waste is a very small contributor of particulates.** The Environment Agency is clear that only 0.05% of PM2.5 is produced by EfW compared to 34.3% from domestic wood burning and 5.35% from road traffic<sup>11</sup>. For NOx, the energy from waste causes 1.12% of emissions, compared to 33.5% for road traffic.<sup>12</sup>
- **The alternatives to energy recovery were rigorously analysed in the DCO,** in the Alternative Assessment Report produced by technical specialists Ramboll<sup>13</sup>. The Assessment considered:
  - Landfill
  - Gasification and pyrolysis
  - Mechanical biological treatment (MBT)
  - Energy from waste
  - Anaerobic digestion
- **The evidence demonstrates that replacing the existing energy from waste plant at Edmonton EcoPark is the most environmentally responsible way to deal with the challenge of north London's non-recyclable waste.** None of the alternatives – including those presented by Extinction Rebellion – provide a suitable or sustainable solution for the volumes of waste that need to be treated at Edmonton EcoPark. There are major limitations with each of the alternatives, all of which were carefully considered before energy recovery was determined to be the best option:
  - **Landfill – this has no place in a carbon neutral future.** The EU, UK Government, GLA and NLWA all call for a drastic reduction in landfill in response to tackling climate change. Landfill in the UK is subject to a significant tax – currently around £90 per tonne of waste – which increases every year. Not only is it harmful to the environment, it is also much more expensive than energy recovery.
  - **Pyrolysis and gasification** – this technology is still unproven at the scale required to treat north London's non-recyclable waste. There have been several examples of high-profile failures of these plants in the UK and the NLWA simply cannot take the risk of using this small-scale and unreliable approach.
  - **Mechanical Biological Treatment – MBT is neither proven, nor used at scale in the UK. Few plants have been built in the UK, and none have operated successfully at design capacity.** MBT is not a solution for disposing of non-recyclable waste. It is just a step before treating it and then transporting it on to be burnt in an energy from waste facility.
  - **The quality of recyclable materials extracted by MBT are often low quality and often sent to landfill or energy from waste plants.** The amount of quality soil produced by MBT has also been minimal, and only suitable for landfill engineering. Another output from MBT is hazardous leachate, which has to be transported at significant cost to other facilities for yet more treatment.
  - **MBT is frequently linked to spiralling costs and poor efficiency levels. There have been a host of issues with existing MBT plants.** In Essex, there are widely reported performance issues with the Tovi Eco Park. In Dumfries and Galloway, the contractor of the MBT plant terminated its operating contract due to making significant financial losses. And, in Cambridgeshire, the operator of an MBT plant was fined for not treating the contractual waste levels.

<sup>11</sup> Environment Agency, Internal Briefing Note on UKWIN Article, July 2019,

[http://www.esauk.org/application/files/3815/4514/8158/180817\\_briefing\\_on\\_UKWIN\\_particulates\\_article\\_V1.0.pdf](http://www.esauk.org/application/files/3815/4514/8158/180817_briefing_on_UKWIN_particulates_article_V1.0.pdf)

<sup>12</sup> Ibid.

<sup>13</sup> North London Waste Authority, Alternatives Assessment Report, October 2015,

[http://www.northlondonheatandpower.london/media/asvicpm2/ad05-03\\_alternatives\\_assessment\\_lores.pdf](http://www.northlondonheatandpower.london/media/asvicpm2/ad05-03_alternatives_assessment_lores.pdf)



- **Overall, the MBT process increases the carbon footprint of waste treatment and comes at a higher cost than energy recovery.**
- **Anaerobic digestion** – this method is only suitable for food or organic waste where it is collected separately. We actively use this for treating food waste now. But non-recyclable waste cannot be treated in an anaerobic digestion plant.
- In addition to these technologies, Extinction Rebellion have also proposed that “Distributed modular gasification is a clean solution for converting unrecyclable plastics into either 100% electricity or a mixture of hydrogen and electricity”. However, this technology is still under development and unproven, even on a small scale. Only one project has been commissioned – the Peel development on Merseyside – which is set to come online in two years. It will be able to treat 12,000 tonnes of waste annually. It would therefore be irresponsible for the NLWA and the seven north London boroughs to put its faith in an untested, small-scale solution that would not be capable of treating up to 700,000 tonnes of waste in the future.

## Conclusion

The North London Waste Authority and its seven boroughs take extremely seriously our responsibility to provide practicable and reliable solutions for managing waste. During this Coronavirus pandemic, social media shows many messages from individuals and households recognising the crucial work of removing and treating waste, on which our communities depend. However, it has also demonstrated through the huge increases in residual waste tonnages and contamination of recycling collected, how much work we still have to do to get our residents to do the right thing and reduce, reuse and recycle their waste properly and at the levels we all want to see.

North London’s seven boroughs are committed to planning responsibly for a carbon-neutral future. This must include a sustainable approach to waste management across north London. We are redoubling our efforts to increase public awareness around reduction, reuse and recycling. Our ambitious Residual Waste Reduction Plan was agreed by councillors in April 2020 and includes wide-reaching action to achieve just this. We are also investing in the recycling infrastructure of the future, including a new, public reuse and recycling centre at the Edmonton EcoPark. And, as we have set out in this letter, it is critical that we get it right when it comes to treating non-recyclable waste.

**We cannot rely on the unproven, inefficient, unsustainable and frankly ill-informed solutions proposed by Extinction Rebellion for the tonnages we are ultimately responsible for. Our duty to our residents obliges us to plan carefully and responsibly for the future. That’s why we are acting now to deliver modern, clean and safe facilities for the residents of north London, in which local communities can take pride.**

Yours sincerely,



**Cllr Clyde Loakes**  
Chair, North London Waste Authority