



Caroline Russell AM
City Hall
The Queen's Walk
LONDON SE1 2AA

Cllr Clyde Loakes
North London Waste Authority
1b Berol House,
25 Ashley Road,
Tottenham Hale N17 9LJ

16 July 2020

Dear Cllr Loakes,

Deputation to the NLWA meeting, 25 June 2020

Thank you for writing to me to respond the points I covered in my deputation on 25 June 2020 asking the NLWA board to take the opportunity to pause and review the need for a new Energy from Waste facility in Edmonton. I would like to follow up on some of the points you raise and will do so in the same order as your letter.

Impact on Recycling Rates by Incineration

The NLWA has already missed the Government recycling target for municipal waste for 50 per cent by 2020. I reiterate what I said in my deputation (attached for reference): "In the last five years North London's recycling rate has actually decreased from 33 per cent to 30 per cent, against recycling targets of 45 per cent by 2015 and 50 per cent by 2020." Yet, in your letter you state: "as part of the NLHPP we are investing £100m in building new recycling facilities to help boost recycling rates to 50 per cent". Therefore, I would like to ask:

1. Why is the NLWA not aiming to meet DEFRA's targets of "65 per cent recycling rate for municipal solid waste by 2035 as outlined in 'Our Waste, Our Resources, A Strategy for England'?"
2. In your paragraph on the Circular Economy you state: "The NLWA's dedicated team actively supports the circular economy through its award-winning programme of activity to reduce waste and increase recycling – the most extensive of any Waste Disposal Authority in London." What evidence you can provide to support this statement that it is the most extensive?

With regard to your statement that "the most successful recyclers use energy recovery to treat non-recyclable waste and reduce landfill" I again cite my speech from 25 June: "Western Riverside Waste Authority Boroughs' recycling has fallen each year since the

Belvedere Energy from Waste plant in Bexley went into operation in 2012. On average these four councils recycling rates went down by nearly 4 per cent from 2010 to 2016, putting three of them in the worst six councils for recycling in England.”

In addition, in the report A burning problem: How incineration is stopping recycling, looking at the rise of EfW facilities in England, Baroness Jenny Jones, found that the total amount of waste sent for incineration across England increased by 5.5 million tonnes in 2012/13 to over 10 million tonnes in 2016/17. Simultaneously, recycling stagnated at around 11 million tonnes. In fact, the rise in EfW corresponds with a fall in the amount of waste going to landfill, but much of this newly incinerated waste is recyclable. The report also showed that in South Gloucester that over half of the black bin waste that was burnt could be either recycled or composted, while in 2014/15, Derby’s recycling rate fell rapidly from 42 to 32 per cent. This was partially attributed to a minimum organic content requirement in the EfW contract, meaning kitchen/garden waste was diverted into incineration.

Circular Economy

The point of the circular economy is not simply to “reduce waste and increase recycling”. As the Mayor of London says in his Environment Strategy: “Effective waste management, delivering high quality materials to market, can give local authorities a reliable high value income stream. This can help to offset costs associated with service improvements. More of London’s reusable items like furniture, fittings and electrical appliances need to be kept in use. Redistributing them to where they are needed can create local work, keep resource costs down and help reduce poverty.” I would like to ask:

3. What steps are the NLWA taking to turn its waste into an income stream by reusing, repurposing and redistributing suitable items?

Part of both the Mayor’s and DEFRA’s plans for waste management are to make London a zero-waste city. DEFRA’s ‘Our Waste, Our Resources, A Strategy for England’ includes the target “to make London a zero waste city, by 2026 no biodegradable or recyclable waste will be sent to landfill”, while the Mayor is working with the London Waste and Recycling Board and using its Circular Economy Route Map to achieve this aim. For this to happen, the LWARB has set out the following targets:

- Ensure that no food waste is sent to landfill or incineration
- Send zero textiles to disposal (landfill or incineration).
- Send zero electricals to disposal (landfill or incineration).

However, as the London Assembly Environment Committee’s Energy from Waste Report found: “Recyclable materials are unnecessarily going to incineration, including materials that are potentially hazardous to health when burnt. We heard that waste is not sorted as part of the EfW process and EfW operators feel that recycling separation is the responsibility of households, businesses or local authorities.” [...] “Because not all boroughs offer separate food waste collections, food waste is being burnt rather going to other processes which are more environmentally beneficial, such as anaerobic digestion. Anaerobic digesters in London are under-utilised. By not checking the content of waste received, EfW sites are potentially burning the resources of the future – a hindrance to the circular economy as well as releasing carbon emissions into the environment.” I would like to ask the following:

4. What steps are the NLWA taking to ensure that ALL waste is sorted, including black bag waste, before incineration?
5. Does the NLWA provide enough anaerobic digestion for the food waste currently collected from households, and what plans does it have to increase both food waste collection and reprocessing to support moves towards the circular economy?

Arising

In your letter you say: "Individual households are expected to reduce their waste and recycle more. However, the projected housing growth in north London means there will be more households leading to an increase the overall volume." Yet, as I said in my deputation: "by 2018/19, the seven boroughs were actually producing about 150,000 tonnes less waste than the NLWA had predicted and therefore about, 75,000 tonnes less residual waste than predicted."

Furthermore, in the NLWA's own Annual Monitoring Report of 2018-19 it says: "Unexpectedly, the amount of waste produced between 2006/07 and 2012/13 fell despite the increase in population and dwelling stock [...]. 2013/14 saw a return to increasing waste volumes but this has not been sustained and the waste produced in the north London area has decreased again in 2018/19."

Finally, looking at the NLWA's analysis of waste predictions. These are modelled on:

"three scenarios relating to expected future recycling rates (high, central and low) were applied to the total household waste arisings. The recycling targets selected for household waste are as follows:

- Low Recycling – 40 per cent recycling by 2020/21 and static thereafter;
- Central Recycling – 50 per cent recycling by 2020/21 and remaining static thereafter; and
- High Recycling – 50 per cent recycling by 2020/21, rising to 60 per cent by 2031/32 and remaining static thereafter.

"The results provided a range of potential future tonnages of non-recyclable waste available for energy recovery."

None of these scenarios models the non-recyclable waste available for energy recovery if, as the seven boroughs should be doing, they meet the 65 per cent recycling rate the Mayor expects to be achieved by 2030 and DEFRA by 2035. Therefore, can I ask:

6. Has NLWA modelled future recycling rates of 65 per cent from 2030 onwards and the impact of this on the viability of the incinerator?

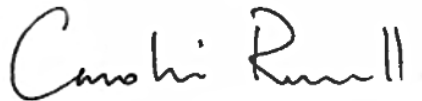
Impact of Covid-19

Lastly, on your point that "The UK Government is clear that investment in infrastructure will be critical to stimulate the economic recovery." I would respond by saying that, continuing to invest in carbon-intensive infrastructure should play no part in the green recovery that our capital and country needs. Nor is it one that the people want. The Climate Assembly UK,

set up by six Select Committees of the House of Commons to understand public preferences on how the UK should tackle climate change, has produced an interim briefing and letter to the Prime Minister in response to coronavirus. This specifically states that: "Post lockdown steps to aid economic recovery should drive progress to net zero target." Building a larger incinerator facility in Edmonton does not support that aim.

I look forward to hearing from you at your earliest convenience.

Yours sincerely,

A handwritten signature in black ink that reads "Caroline Russell". The signature is written in a cursive, flowing style.

Caroline Russell

Green Party Member of the London Assembly

Attached: Deputation to NLWA meeting 25 June 2020