

NORTH LONDON WASTE AUTHORITY

THURSDAY, 24 JUNE 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

14. DEPUTATIONS (IF ANY)

(Pages
3 - 32)

The following deputations are attached:

- Annette Baker, Plastic Free Crouch End
- Monica Caruso, EnCaf Youth
- Delia Mattis, Black Lives Matter Enfield
- Nadia Amara, Chingford resident
- Carina Millstone, environmental campaigner
- Ben Griffith, Islington Environmental Emergency Alliance
- Helen Mayer, Haringey Labour Climate Action
- Helen Karamallakis, Edmonton Constituency Labour Party
- Aurora Yaacov, Enfield residents
- Dr Edward Tranah, local resident
- Councillor Emma Best AM, Londonwide Assembly Member & Endlebury Ward Councillor (Waltham Forest)
- Georgia Elliott-Smith, environmental engineer
- Felicity Premru, North London Trades Union and LESE TUC Environmental Sustainability and Just Transition Network

SUPPLEMENTARY AGENDA ENDS
Issued on: Wednesday, 16 June 2021

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Agenda Item 14

For decades I have been involved in campaigns to do with the environment and incineration of waste has always been a major concern.

There is no such place as away, and we do not know what is in the black bags which go into the incinerator. There could be paint, weedkiller, rat poison, toxins of many varieties, which then pollute the air.

Energy is now being produced from renewable sources and it is not necessary to provide energy from burning waste.

New technology which extracts recyclables from black bags – particularly plastics and metals – is essential if we are to move forward to a circular economy.

We are asking that the NLWA pause and reflect on the necessity to enlarge the incinerator in Edmonton. The growing public awareness of unnecessary packaging, the realisation that our consumer economy is unsustainable, is resulting in stricter rules around reduction, reuse and recycling and in order to protect the climate, we have to put in place procedures which support people to change. This is where the money should be spent, not on enlarging incinerators.

Taxpayers` (our) money must be spent wisely and technology used for the benefit of all. This outdated scheme has to be rethought.

Annette Baker

Community Lead, Plastic Free Crouch End

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From: [Olivia Eken](#)
To: [Cheryl Hardman](#)
Cc: [REDACTED]
Subject: Deputation Request NLWA AGM Meeting
Date: 20 June 2021 22:00:42

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Dear Cheryl,

I would like to register Monica Caruso, part of EnCaf Youth, a local youth climate action group to address the North London Waste Authority Meeting on Thursday 24th June, 2.30pm, under Item 14 - Deputations - on the Agenda.

As a group of sixth formers, it is not possible for us to attend the meeting given the constraints with our school timetables. No member of our organisation is able to attend the meeting as we are either sitting school exams or in lessons during the time of the meeting. We kindly request to be able to submit our speech in the form of a pre-recorded video, spoken by Monica Caruso. As you can understand it is incredibly difficult for us as students to attend the meeting and hope that the video format will enable us to express our opinions at the session.

Please let us know if this circumstance can be accommodated to.

Monica Caruso- [REDACTED] and myself Olivia Eken [REDACTED] are the ones forming the deputation. Monica will be the individual performing it.

Regarding the deputation, the points Monica is intending to make are:

The impacts of the Edmonton incinerator expansion on the local community:

Upper Edmonton has a population where 56% are from ethnic minorities in 2019. Upper Edmonton is also within the 10% most deprived wards in England. We fear the incinerator will disproportionately affect the population of the area who are predominantly from low economic backgrounds and ethnic minorities.

Impacts on future generations

The incinerator will continue to produce CO2 emissions affecting the future of young people in the area. These emissions will contribute to the climate crisis and compromise the health of the population.

We ask for the pause and review for the expansion of the facility.

If you require any additional information regarding the deputation please do not hesitate to ask me.

I look forward to hearing back from you.

Kind regards,
Olivia Eken

From: [Delia Mattis](#)
To: [Cheryl Hardman](#)
Subject: NLWA AGM on the 24th June at 2:30pm
Date: 21 June 2021 10:32:44

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Dear Cheryl,

I would like to register myself Delia Mattis, Founder of Black Lives Matter Enfield, to address the North London Waste Authority Meeting on Thursday 24th June, 2.30pm, under Item 14 – Deputations – on the Agenda.

The points I am intending to make are:

Institutional and environmental racism – Black Lives Matter Enfield is calling for the plans to expand the Edmonton incinerator to be paused and for the North London Waste Authority to properly consult the people of Enfield. We believe it is racist planning that determines where these incinerators are allowed to exist. Incinerators are three times more likely to be built in deprived areas which are more likely to have a racially diverse population like Edmonton which is around 60% black, brown or other racial or ethnic group.

Ella Kissi Debrah died in 2013, she lived near the South Circular Road in Lewisham, south London and the recent coroner's ruling that air pollution made a material contribution to her death, has sent shock waves through the black community in Enfield. Edmonton is already polluted from the North Circular Road, the expanded incinerator on top of this will make matters worse in terms of vehicles on the North Circular travelling to and from the plant as well as burning more rubbish.

Health Inequality - Covid-19 has disproportionately affected Black and Brown communities. In Edmonton covid mortality rate is 40% higher than England average according to ONS statistics and is one of most deprived areas of UK, those in power should be choosing to break cycles of inequality and injustice not lock them in by building an even larger incinerator at the same site.

Experts are now linking air pollution to Covid 19 deaths. The ONS has published a report on the link between long-term exposure to dirty air, severe symptoms of COVID-19 and a greater risk to deaths. This gives even more reason for black communities to oppose the plans.

Kind regards,

Ms Delia Mattis


[Redacted]

[Redacted]

Telesha Reid

[Redacted]

Alesha Reid

[Redacted]

Mrs Stalla Simonin

[Redacted]

From: [Nadia Amara](#)
To: [Cheryl Hardman](#)
Subject: NLHPP future services
Date: 21 June 2021 14:32:11

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Dear Cheryl,

I would like to register the following residents of Chingford, to attend the North London Waste Authority meeting on 24 June, 2.30pm, under Item 7 - Deputations - on the agenda.

Betty Hales, [REDACTED]

Nadia Amara, [REDACTED]

We speak as mothers and grandmothers about our frustrations and concerns and also as members of Chingford and Woodford Green Constituency Labour Party, which adopted the policy we wish to argue for.

Betty Hales will address the meeting on our behalf. The points she will be raising are:

The initial decision to replace the current incinerator with a bigger one was made before the recent raising of public and scientific awareness about the considerable disadvantages and dangers of incineration as a solution to waste disposal. The initial consultation was not sufficiently comprehensive or extensive to allow all local residents to make their views known and subsequent submissions to the committee, including our own, raising issues of concern and asking for a pause in the process to allow for it to be reconsidered, have not been taken sufficiently seriously. In fact, they have been met with derision and rudeness. We are appalled, in particular, at the seeming lack of accountability of the NLWA and its intransigence on this issue, even in the face of official Labour Party Policy now being against Incineration.

Over the last few years, it has also become obvious from our own experience that the volume of household 'black sack' waste has reduced considerably so the need for a bigger incinerator is even less clear now than it was when this project was first proposed. Surely, the need to constantly feed the furnace will result in increased importation of waste from a larger area, increasing traffic pollution, and reduce the incentive to increase and improve recycling. This project is extremely expensive and potentially not the right choice. Therefore, we believe that to pause and reconsider while there is still time would be the responsible course of action on the part of the NLWA, a sign of strong leadership not weakness.

I look forward to hearing from you.

With best wishes,
Nadia Amara

From: [Carina Millstone](#)
To: [Cheryl Hardman](#)
Subject: Deputation request- NLWA AGM on 24th June at 2:30 pm
Date: 21 June 2021 14:36:24

[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 writing to request to make a deputation at the NLWA AGM on the 24th June at 2:30pm. My name is Carina Millstone, and I would like to give the deputation in my personal capacity as an environmental campaigner, parent, and resident of South Chingford.

The deputation concerns the plans to install Carbon Capture and Storage (CCS) on the North London Heat and Power Project (the new Edmonton incineration)

Specifically, and with reference to information provided by the NLWA under EIR, I intend to raise the following points:

1. The Committee on Climate Change's (CCC) [6th Carbon Budget](#) (Dec 2020), identified the proliferation of incinerators in the UK as a key challenge in addressing climate change (not part of the climate solution). Key policy recommendations to UK government include:

'To prevent a major increase (in emissions), either a substantial fraction – potentially a majority – of the EfW plant pipeline will have to remain unbuilt, EfW fleet utilisation rates will have to fall, or else carbon capture and storage (CCS) will need to be installed on plants from the mid/late-2020s onwards to mitigate the additional emissions.'

'For those plants not yet under construction, new energy-from-waste plants (and plant expansions) should only be constructed in areas confirmed to soon have CO2 infrastructure available and should be built 'CCS ready' or with CCS.'

2. Since the 6th Carbon Budget, the decarbonisation ambition identified in the budget has been enshrined in legislation, with the government setting a legally mandated target of 78% reduction in emissions by 2035 compared to 1990 levels.

3. Information provided by the NLWA requested under Environmental Information Regulations (EIR) (<https://www.nlwa.gov.uk/ourauthority/scheme-of-publications/request-information-about-potential-carbon-capture-and-storage>) show that the proposed incinerator does not follow the CCC's advice, and therefore runs contrary to the new national, legally enshrined emissions reduction target. Specifically, the EIR shows:

- the new incinerator will not be 'CCS ready', rather, it will be designed as to 'not preclude' future CCS retrofit.
- The new incinerator is not in an area confirmed to have CO2 infrastructure available- quite the opposite: the government has not allocated any funding for this in its plans to 2030 (and not provided any information on future funding intentions)
- 'The likelihood that CCUS will be economically viable depends greatly on establishing a shared 'infrastructure hub' in Greater London and the south east of

England for carbon dioxide transport, intermediate storage and shipment to a long-term storage facility. This is expected to take considerable time'

- CCS on any future Edmonton incinerator is at least 10 years away- after 2031

It is absolutely clear from the EIR response that building a new incinerator with a hypothetical, unproven, un-costed plan to retrofit it with CCS in over a decade will hamper the legally mandated emissions reduction targets set by the government.

I urge the board of the NLWA, composed of councillors whose local authorities have nearly all declared climate emergencies, to recognise the irreconcilable tension between their continued support for the rebuild and expansion of the Edmonton incinerator and the urgent need to decarbonise our economy.

Thank you for your consideration,

Carina Millstone.

Request for deputation to NLWA from Islington Environmental Emergency Alliance

Making the request: Ben Griffith

The deputation:

Caroline Royds - [REDACTED]

Lindy Sharpe - [REDACTED]

Jill Ellenby – [REDACTED]

Richard Gallen - [REDACTED]

Ben Griffith – [REDACTED]

One member of deputation to address the NLWA:

Ben Griffith

Summary

Islington Environmental Emergency Alliance brings together Islington residents, business owners, subject matter experts, environmental campaigners, religious leaders, organisations and community groups from across the Borough. The purpose of the collaboration is to assist, through constructive challenge and input, Islington Council to meet their objectives for reducing greenhouse gas emissions. The IEEA has a number of working groups including one on waste.

The IEEA waste working group is deeply concerned about the proposed 30 per cent expansion and redevelopment of the north London incinerator, which will operate up to 2060 and maybe beyond, because of

- The exacerbation of air pollution
- The emission of greenhouse gases
- The perpetuation of the linear economy.

There are strong reasons to believe that the proposed 30 per cent expansion lacks a solid rationale

- According to the NLWA's projections in the Need Assessment, the new incinerator would be much too large except in the worst-case Low Recycling scenario
- Total waste arisings are turning out lower than the projections
- The projections predated the development of economic and political drivers to reduce waste, which have emerged largely in light of the climate emergency
- Surplus incineration capacity is developing across London and the UK.

Just as roads can generate traffic so incinerators can generate waste. We are particularly concerned that the planned incinerator will have surplus capacity and this will undermine

efforts to reduce residual waste for reputational, financial, ideological and structural reasons.

Instead of planning for increasing residual waste, the NLWA and the local Councils should aim to drive it down:

- Reduce total waste arisings through developing a circular economy. Arup reported to the London Waste and Recycling Board: 'A potential reduction of more than 60% in waste arisings can be achieved in less than 30 years. However, a central estimate of approximately 30% waste reduction is likely to be achieved depending on the levels of uptake of circular economy initiatives.'
- Work with residents and businesses to increase recycling by all means possible, eg. by investing in facilities to make it more convenient. We should respect and strive to achieve the London Mayor's target of 65% recycling of municipal waste by 2030. We must learn from best practice including Wales's achievement of a 65% recycling rate in 2020 through the Welsh Collections Blueprint.
- Invest in technology to separate recyclables, in particular plastics, from 'black bag' waste along the lines of the facilities operating successfully eg in the Netherlands. Overall, the performance of residual waste sorting at present is around 40% when organic recovery is included and could rise to 50%.

We strongly support calls for a pause in the new incinerator project and an independent expert review to develop a strategy to drive down residual waste and identify the most sustainable way to deal with the unavoidable waste that remains.

HARINGEY LABOUR CLIMATE ACTION

DEPUTATION PRESENTATION TO NLWA AGM, 24 JUNE 2021

We are here with other deputations to call for a pause and review of the new incinerator.

We welcome the Ecopark proposals. And we accept that we currently need to incinerate SOME residual waste.

But things have moved on significantly since this scheme and DCO application were formulated in 2015 - there's now growing evidence that in its current form it's no longer environmentally or financially sustainable. It has to adapt.

Pause and review isn't a climb-down, it's an opportunity. An opportunity to update the proposals in line with major advances in technology and policies since 2015 –and, importantly, to build in flexibility, as these continue to rapidly evolve, to future proof it. Yes, there will be short term costs. But these could avoid the cost of a potential stranded asset in the long term.

And realistic, better, options, do exist.

I'll briefly outline some changing circumstances that necessitate review. Other deputations will cover these in more detail. I'll then note some interventions by prominent experts and politicians.

- Over-capacity:
We now have the contradiction of more incinerators on board (in Herts and Essex) alongside projected reductions in residual waste through new technologies and regulations. The mayor's office predicts a surplus capacity of 950,000 tonnes for London.
- Recycling
The Waste Authority offers admirable support for reducing residual waste. Unfortunately there is widespread evidence that the incentive to feed incinerators detracts from this. Edmonton already incinerates recyclables contained in 'black bag' waste, including high carbon plastics. New tried and tested material recovery facilities could extract this.
- Flexibility and future proofing
The number of treatment streams in the proposed plant has reduced from 5 to 2, preventing the flexibility it needs to reduce incineration just as emerging regulations and technologies reduce residual waste. The Authority proposes *importing* waste if local supplies reduce, instead of lower carbon alternatives.
- Carbon
Since 2015 we've seen major advances in renewable energy and in the energy efficiency of buildings, and a lower carbon grid. And the Climate Change Committee has recommended Carbon Capture for all incinerators, while incineration could well be included in the next Carbon Trading round to meet the government's new obligations. So EfW can no longer be claimed to be a low carbon or cost-effective option.
- Air quality
There is currently no evidence that incinerator emissions are safe for the surrounding socially and environmentally deprived Edmonton community.
- Local economy
The circular economy offers more long-term sustainable investment in local training and jobs than incineration.

- Cost
Pause and review would enable future-proofing measures, including more waste streams, advanced material recovery facilities, carbon capture and renewable energy alternatives for the Decentralised Energy Network. Long term savings would outweigh the short-term costs.
- And most importantly, the Climate and Ecological Emergencies.
We simply can't afford any compromises on waste reduction or carbon emissions – even our most ambitious efforts may not be good enough.

Our case is backed by many prominent experts and politicians.

Labour MP's who have expressed concern include Daniel Zeichner, Stephen Doughty, Darren Jones, Alex Sobell, Sharon Hodgson, Kate Osamor (Edmonton), who in 2020 called for "an immediate pause and review", and Alan Whitehead, Shadow Minister for Energy and the Green New Deal, who recently said "the age of incinerators is over"

Sadiq Khan has said "I have been clear London is facing a climate emergency and will continue to oppose new incineration in London"

Defra, has warned that further investment in incineration could hinder developments in recycling, Research from WRAP in Wales has shown that 75% of their residual waste could have been recycled.

Wales has set limits on household waste incineration up to 2025, with **none** sent to landfill or incinerators by 2050

Recent parliamentary debates have called for a halt to EfW investment and for an incineration tax. This February the government said it would consider this in the long term if Environment Bill targets were not met.

So let's not go against the flow. Let's pause and review. Let's redesign the proposals to accommodate new developments, for the benefit of our boroughs and our planet.

DEPUTATION STATEMENT

The NLWA must carry out a full, independent, transparent and statistically reliable environmental and social impact assessment of the proposed new Edmonton incinerator taking account of:

- a. individual local councils' climate emergency commitments;
- b. the UK government's 2050 net-zero commitment;
- c. the UK Government's 'sustainable finance' strategy.
- d. the expected change in waste streams due to increased recycling rates;
- e. the changing fuel mix in the UK energy market and shifts in attitudes of consumers and energy suppliers away from purchasing energy created through incineration of household waste;
- f. Alternatives to incineration and landfill, through a review of best practice from other cities and considering new technologies being developed for reprocessing domestic and commercial waste;
- g. the links between air pollution and increased negative impacts on public health

Any environmental and social impact assessment that has already been carried out is insufficient unless it has taken all the above points into account.

We call on all NLWA board members asking them to collectively:

- pause and reconsider the redevelopment and expansion of the Edmonton Incinerator.
- put on hold all contracting processes.
- postpone funding the project until there is a democratic and scientific agreement between all parties, including the general public.
- consult widely with communities and residents of North London on different options for waste prevention, recycling and management.
- commission a fully independent scientific investigation into the effects on public health, climate change impacts and alternative solutions.
- review the business case and provide an independent and rigorous cost benefit analysis for the plant and its alternatives.

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Dear Cheryl,

We would like to register Aurora Yaacov to address the North London Waste Authority Meeting on Thursday 24 June, 2.30pm, under Item 14 - Deputations - on the Agenda.

She is speaking on behalf of a coalition of interests, each representative of a large constituency: Upper Edmonton residents (REACT), local trade unions (NEU, Unite Community) special interest and civil society groups, Labour councillors and members, XR Enfield. All Enfield residents.

The points she is intending to make concern:

Failure to engage sufficiently with residents

Residents are unaware, for instance, that waste will be imported into Enfield from other places. Residents are generally unaware of the very nature of incineration i.e. that carbon-based waste is burnt (just like gas, coal and oil) and carbon dioxide is produced; 700,000 tonnes of it each year. Yet this figure isn't published because it is offset against the carbon dioxide that might have been emitted had gas been burnt for the district heat network. The energy generated from incinerators is neither renewable nor low carbon and certainly not green; to pretend otherwise is to mislead the public. Pause and review would give time for a full and proper public information campaign followed by genuine consultation.

Q1: Is the NLWA confident that the proposed incinerator has the support of directly affected communities, residents of North London and of their MPs, today?

Precautionary Principle

A nine-year-old girl's fatal asthma attack¹ has now been linked to illegally high levels of air pollution. Evidence at home and abroad, using improved bioassay methodologies which can detect the very smallest, ultrafine, particles, are revealing microparticles in the toenails of children and in other plant, animal and human organs, correlated with proximity to an incinerator². Not, therefore attributable to other sources such as vehicular movements (which are, in any case, scheduled to increase with the import of waste from beyond the NLWA³). The current Edmonton incinerator emits some 1.8 billion PM 2.5 per second⁴. There is no commercially available equipment to accurately monitor or to completely filter the emissions of ultrafine particulate matter and incinerator operators are not required to monitor where the pollution lands. The DHSC⁵ reports that "Studies have not identified a threshold concentration below which there is no association between exposure to particulate air pollution and adverse human health and DEFRA, similarly records "There is no safe level for particulate matter (PM10, PM2.5)"⁶

Employing the precautionary principle, pausing and reviewing the evidence, could prevent many premature deaths each year.

Q2: Can the NLWA assure residents living in the path of the plumes that the proposed incinerator will not undermine efforts to improve local air quality and health?

1 <https://www.theguardian.com/environment/2020/dec/16/girls-death-contributed-to-by-air-pollution-coroner-rules-in-landmark-case>

2 Biomonitoring of Metals in Children Living in an Urban Area and Close to Waste Incinerators:
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7143875/>

3 <http://www.northlondonheatandpower.london/faqs/future-proofing/what-happens-when-recycling-rates-increase-and-there-s-less-non-recyclable-waste-to-treat/>
<http://www.northlondonheatandpower.london/faqs/future-proofing/is-it-big-enough-to-meet-current-and-future-waste-needs/>

4 [https://ukwin.org.uk/files/particulates/PRG Particulates Matter December 2019.pdf](https://ukwin.org.uk/files/particulates/PRG%20Particulates%20Matter%20December%202019.pdf)

5 [https://ukwin.org.uk/files/particulates/PRG Particulates Matter December 2019.pdf](https://ukwin.org.uk/files/particulates/PRG%20Particulates%20Matter%20December%202019.pdf)

6 Source: DEFRA, PHE and Local Government Association, Air Quality: A Briefing for Directors of Public Health (DEFRA, March 2017)

A stranded asset

The NLWA estimates that constructing the incinerator runs upwards of £600 million; with oncosts and risk contingencies bringing it to more than £1bn, approaching double the original estimate. The NLWA's commitment to installing Carbon Capture and Storage (CCS) has not been costed and the councils' will bear all these unknown costs⁷

Incineration is 20th century technology and improvements in recycling, waste management and consumption will render the incinerator redundant, a stranded asset, before the end of its operational life; the costs to the 7 authorities sunk. Most certainly so if the Authorities are serious about reaching their 2030 recycling targets. Targets reached already by some authorities in the UK and by no mean unrealistic. The plant is oversized. At least 50% and probably 85% of its capacity would not be used over its lifetime. Not all the money spent to date will be lost, because much of it is investment in the infrastructure necessary for more functions beyond incineration, such as Resource Recovery and the Reuse and Recycling Centre.

A pause, and review of the full cost is possible and would reveal that there are much less costly and more sustainable solutions to waste management. Not to do so will cost far more: environmentally, socially and economically.

Q3: Is the NLWA confident that the business case for the proposed incinerator holds true today and over its lifespan and that it will not lock North London -and the UK-into the economic system that has created the climate and ecological emergencies?

Aurora Yaacov, Southgate CLP

EnCaf [Enfield Climate Action Forum <https://www.encaf.org/>]

[REDACTED]

Vivien Giladi, Enfield Nth CLP

Unite Community

Socialist Health Association

Enfield Health and Wellbeing Board

[REDACTED]

Dr Bernard Regan, Enfield North CLP

NEU

[REDACTED]

Grace Coiffic-kamali

Chair REACT [Residents of Edmonton Angel Community Together <https://reactedmonton.org/>]

[REDACTED]

Cllr Yasemin Brett, Southgate CLP

Unite Community Enfield, Political Education Officer

[REDACTED]

Francis Sealey

Director at GlobalNet21 and Author of Global Public Square

EnCaf [Enfield Climate Action Forum <https://www.encaf.org/>]

[REDACTED]

⁷ Information obtained under Environmental Information Regulations (EIR) shows that this plan has not been costed.

Maria McCaul

Chair Unite Community, Enfield



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From: [Ed Tranah](#)
To: [Cheryl Hardman](#)
Subject: Deputation request
Date: 22 June 2021 05:56:52

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Dear Cheryl,

I hope you are well.

I would like to submit the following deputation request, relating to the proposed re-build of the Edmonton EcoPark. My name is Edward Tranah and I live in [REDACTED]. It is just myself forming this deputation, and I will be the sole member to address the Council.

The issues I intend to raise are as follows:

1. We are living in a climate emergency which The Lancet describes as "the greatest global health threat facing the world in the 21st century". The expansion of Edmonton EcoPark's incineration capacity is illogical in this context, given the carbon dioxide which is produced by this method of waste disposal.
2. The Edmonton EcoPark incinerates plastics, compostables and other recyclables. I cannot see that there is a reason which could justify the environmental and potential health impacts of doing so.
3. I know that the NLWA cannot demonstrate that incineration at Edmonton EcoPark does not harm public health, particularly the health of those living closest to the facility.
4. The NLWA has not engaged sufficient numbers of local people with its plans to re-build Edmonton EcoPark. I believe this is amoral in view of environmental and potential health concerns.

Thank you very much. I look forward to hearing from you.

Yours sincerely,

Dr Edward Tranah
[REDACTED]

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From: [Emma Best](#)
To: [Cheryl Hardman](#)
Cc: [REDACTED]
Subject: Re: Emma Best Deputation Request / June 24th 2021
Date: 22 June 2021 13:03:26

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Hi Cheryl,

Apologies but earlier I erroneously left off Cllr Jemma Hemsted, Valley Ward (Waltham Forest).

Re-reading delegation standing orders I'm not sure if it will be 7 plus speaker or 7 total.

If it is 7 total please can you remove Roy for Jemma.

Best wishes,

Emma Best AM
Conservative Londonwide Member

From: Emma Best [REDACTED]
Sent: Tuesday, June 22, 2021 8:53:29 AM
To: Cheryl.Hardman@camden.gov.uk <Cheryl.Hardman@camden.gov.uk>
Cc: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: Re: Emma Best Deputation Request / June 24th 2021

Cheryl,

Many apologies please can you withdraw my last submission and accept the below deputation signed by myself and names listed (emails cc'd).

This deputation is signed and supported by:

Sir Iain Duncan Smith, MP for Chingford & Woodford Green
Cllr Mitchell Goldie, Endlebury Ward (Waltham Forest)
Cllr Kay Isa, Chingford Green Ward (Waltham Forest)
Cllr Roy Berg, Endlebury Ward (Waltham Forest)
Cllr Tim James, Hatch Lane Ward (Waltham Forest)
Cllr John Moss, Larkwood Ward (Waltham Forest)

Cllr Emma Best AM, Londonwide Assembly Member & Endlebury Ward Councillor
(Waltham Forest) (SPEAKER)

I would like to register to address the North London Waste Authority Meeting on
Thursday 24th June under Deputations on the Agenda.

I intend to speak to the below points:

We are extremely concerned about the plans to redevelop Edmonton Incinerator and
are requesting a pause, and a rethink.

We are requesting a Value for Money (VfM) review of the project with costs having
spiralled from original estimates of £650million to £1.2billion. We believe it would
be irresponsible to proceed without further evaluating this leap in costs and whether
there is a more financially expedient solution.

We are also requesting a pause to review the evidence and concerns raised in an open
letter by NHS doctors which brings to attention the risk to health this rebuild poses to
local residents. You can find their letter here. A study from the British Heart
Foundation found that Waltham Forest, downwind from the incinerator, has the
second highest PM 2.5 concentration of all boroughs in the country and we are
extremely concerned about the threat this poses to all residents and in particular those
with existing respiratory conditions. This is even more worrying following the Covid
pandemic and it's respiratory after effects. Furthermore the enormous increase in
traffic as waste from a much wider area than originally envisaged will need to be
transported to the site will run counter to the overall plans for reduced road
congestion and emissions.

Bearing in mind also, that all local MP's effected by the effects of the incinerator are
opposed to it development and continuation, I urge you to agree to our call to pause
and rethink this project.

Best wishes,

Emma Best AM
Conservative Londonwide Member

From: [Georgia Elliott-Smith](#)
To: [Cheryl Hardman](#)
Subject: Deputation request, NLWA AGM, 24th June 2021
Date: 22 June 2021 08:47:42

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Dear Cheryl,

I would like to make a deputation at the NLWA AGM on the 24th June at 2:30pm. I would like to give the deputation in my personal capacity as an environmental engineer, local business owner and Enfield resident. I will make this deputation myself and am not making this application with any other person.

My deputation concerns the creation of persistent organic pollutants (POPs) by incinerators, the distribution of these POPs via incinerator plume emissions and the onwards transmission of these toxins via the sale of fly ash and bottom ash to the construction industry.

Specifically I intend to raise the following points:

1. The Stockholm Convention provides international guidance on the safe management of persistent organic pollutants (POPs). The objective of the Convention is to minimise or prevent human exposure to POPs. It incorporates a precautionary and manufacturer/user pays approach. The Convention covers waste incineration because this is a source of POPs, including dioxin and furan compounds. The UK is a signatory to the Convention.
2. Newer waste incinerator technologies are claimed to run more cleanly and with less environmental impact. Nevertheless, pollutants are still produced.
3. Dioxins interfere with several biological processes that are key to embryonic and foetal development and are causally linked to poor birth outcomes. Dioxins, particulate matter and heavy metals, all emitted by incinerators, are known teratogens. A global metastudy published in 2020 titled "The health impacts of waste incineration: a systematic review" examining all international research on waste incinerators, found plausibility for a causal link between waste incinerators and congenital anomalies and miscarriage.
4. This study concludes that:
"This systematic review highlights significant risks associated with waste incineration as a form of waste management. Many older incinerators were linked with neoplasia, reproductive issues and other diseases. While the results were not consistent across the literature, based on a precautionary principle there is insufficient evidence to conclude that any incinerator is safe. There is some suggestion that newer incinerator technologies with robust maintenance schedules may be less harmful, but diseases from exposures tend to manifest only after many years of cumulative exposure, so it is premature to conclude that these newer technologies improve safety."

Specifically, it recommends that:

- a. *Since there has been insufficient time for health effects of newer technology to emerge, there must be a precautionary approach to licensing and monitoring incinerators.*
- b. *As a condition of applying for a licence to build waste incinerators, independent third-party conducted baseline population studies and long-term surveillance cohort studies be mandated to measure the longitudinal and emerging effects of the incinerator's presence on the local community and the environment.*
- c. *In countries that have ratified the Stockholm Convention, incinerators should be designed to meet the Convention guidelines.*

5. My questions are:

- a. What sampling and monitoring studies have been conducted in the vicinity of the Edmonton Ecopark to test for the presence of toxins associated with incineration (e.g. dioxins, furans, heavy metals)? If none, what evidence does NLWA have that its operations are free from health impacts?
- b. What studies has London Borough of Enfield or NLWA conducted of local population health in regards the above concerns (see point 4b) to examine potential health effects of the existing incinerator?
- c. In respect to the new planned incinerator, what conditions for population health monitoring and reporting have been placed on NLWA to secure a license to build and operate the new facility by any of the seven North London councils, especially LB Enfield within which it is sited?
- d. Similarly, what conditions have been placed on NLWA by the Councils for sampling and monitoring in the locality for the presence of toxins?
- e. What tests are conducted of the incinerator ash sold to the construction industry to ensure there is no presence of dioxins, furans or other harmful substances?
- f. What studies are available regarding the safety of construction workers and building occupants handling products containing incinerator ash?

Finally, I am keen to hear responses to the above questions from the Enfield Council members of the board since they are my elected representatives.

Thank you for considering this application.

Kind regards,
Georgia Elliott-Smith
Resident of [REDACTED]

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Georgia Elliott-Smith
[REDACTED]

From: [felicity.premru](#)
To: [Cheryl.Hardman](#)
Cc: [REDACTED]
Subject: Request for a North London Trades Union deputation to the NLWA AGM
Date: 22 June 2021 08:53:25

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North London Trades Union LESE TUC ESJTN deputation to the NLWA AGM

Dear Cheryl,

We are writing to request a North London Trades Union and LESE TUC Environmental Sustainability and Just Transition Network deputation to the NLWA AGM on Thursday 24 June 2021 to discuss the following.

London, East and South East TUC AGM has recently voted for a motion to urge the North London Waste Authority (NLWA), the GLA, the UK government: Secretary of State and shadow Secretary, to call for a pause and review of the construction of the new incinerator at Edmonton, the North London Heat and Power Project.

The conference discussion and demands included requesting a full and statistically reliable, independent environmental and social impact assessment of the project - this in the light of the local councils' emergency commitments, the UK governments 2050 net-zero, the expected change in waste streams due to increase recycling rates, the potential to use renewable energy rather than burning waste to heat alternatives to incineration and landfill, the increased risks of particulate pollution in the context of the coronavirus crisis, and a review of best practice from other cities taking into account new technologies being developed for reprocessing domestic and commercial waste.

Given that LESE TUC has passed policy on the urgent need for the expansion of climate and green jobs and is asking for a London Just Transmission Commission, we would like to ask about how the authorities are engaging or plan to engage with the trade unions, trades councils and communities on the creation and expansion of the climate jobs and green jobs we need for the future including those in the key area of waste management and the move towards a more circular economy.

We look forward to meeting with you to address these points and the potential for modular options and MRFs for waste and plastic sorting.

The person who will address the meeting is

Fliss Premru

TSSA and Co-chair of the London and South East TUC Environmental Sustainability and Just Transition Network

[Redacted]

Participants are

Phil Lewis,
GLATCU, Camden Unison

[Redacted]

Karel Schling,
Unite Community

[Redacted]

Dr Coral Jones,
Doctors in Unite

[Redacted]

Paul Power
Haringey TUC and Vice Chair Haringey NEU

[Redacted]

Thank you for your time and for this opportunity to meet with the NLWA.

Kind regards,

Fliss Premru
Co-chair, LESE TUC Environmental Sustainability and Just Transition Network

[Redacted]

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