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NORTH LONDON WASTE AUTHORITY

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THURSDAY, 12 NOVEMBER 2026 AT 10.30 AM
COUNCIL CHAMBER, TOWN HALL, JUDD STREET, LONDON WC1H 9JE

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

AGENDA

SUPPLEMENTARY AGENDA

6. DEPUTATIONS (IF ANY)

(Pages 3 - 12)

Deputation statements are included from:

- Ben Griffith, Islington Environmental Alliance
- Malcolm Stow, STEIN!

SUPPLEMENTARY AGENDA ENDS

Issued on: Tuesday, 10 November 2026

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Agenda Item 6

Outlook

Deputation to NLWA?

From Ben Griffith [redacted]
Date Sun 2026-11-08 17:21
To Cheryl Hardman <cheryl.hardman@camden.gov.uk>

[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.

Hello Cheryl

Could I present a 'deputation' to the NLWA on Thursday on the case for a strategic approach focused on waste reduction?

How long would I have?

Many thanks

Ben Griffith
For Islington Environmental Alliance

Sent from Outlook for Android

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To: Chair & Cllrs of NLWA deputation for NLWA meeting 12th November 2026.

Today, you are being asked to approve an agreement between Acconia and NLWA that continues to deny the possibility of any alternative to the existing project for the ERF/EFW Heat&Power Project, that is nevertheless still riddled with delay and uncertainty, whilst continuing to impose a guarded threat, that if this is not agreed, today, this will lead to further financial risks (but not environmental? See appendice).

These threats are not real. They are based on a failure of fair tendering since Acconia in a non-competitive tender that met only 36% of the conditions of tender, who are from a global infrastructure corporation with a known track record of fraud corruption and non-completion, that the NLWA board were informed of at the time, and chose to ignore. The original contract agreed by this previously ever-changing NLWA board was subject to non-disclosure agreement, without public oversight, despite this being supposedly a publicly owned facility. One of the main attractions to the project for many on the ever-changing board was that this would be a publicly owned facility through effectively Public/Private partnership eventually wholly publicly owned.

Yet now after ‘several months’ (7.27) although possibly up to two years of backroom deals with NLWA (appendice 4) Acconia and NLWA have turned out to be untrustworthy partners in this massively costly and increasingly costlier project.

A new contract has been approved by both NLWA&Acconia managements and is recommended to be approved by this board today in today’s report.

Acconia, who resisted going into negotiations with NLWA to the last legal minute (around June 2026 when the last AGM was postponed to today) have agreed this new contract that supposedly transfers all the ‘risk’ (financial only, again not environmental see appendices) back to Acconia possibly on receipt of yet further payments to Acconia, but whereby the risk of legal costs against challenge by Acconia, would fall back on NLWA and councils (the threat as above) who would finish up with a ‘stranded asset’, if completed, and the environmental cost also falls back on councils and their residents, particularly in Enfield where the new over-priced over sized ‘super incinerator’ completed, if completed at all, by another new date, now 12/2029 resides. Cause for pause adjournment should be made if only for the bland PR exercise this report represents, filled with claims and diagrams unreferenced, aiming to convince yourselves and the general public. Complex detail will be presented to you in private, detail and opinions overseen by those who write and sign off the reports themselves, the very people who are charged with advising yourselves appropriately especially around public health and safety health and wealth using and confounding fear with unreliable facts (see appendices), determined directed ignorance onto public officials and representatives as yourselves, to push through challenged this deception.

I am writing this today to implore you not to agree the report today, but to best adjourn in order to direct the provision of independent advice on the whole project governance, possibly resulting in a vote of no confidence in the management of NLWA/LEL, due to the claims made in this report that are inaccurate and biased in order to meet your approval for this horrendously polluting massive gasifier.

And don't be calmed by promise of carbon capture. Ask, what carbon capture? Where are the plans? Where is it going to captured to? Is this really realistic? by, NLWA? By 2035/40/50? (trick question, no it isn't.)

Stranded Asset, half-built now, but that is only bricks and metalworks, there is no incinerator, yet, maybe there never will be if Acconia get up to its tricks again? And, the existing new building DOES NOT NEED TO BE DEMOLISHED! can be repurposed, for mechanical mixed recycling, as we have argued for at least a decade.

I have selected just one paragraph to show how biased this report is:

7.6. 'If a contract change cannot be agreed, it is almost(!) certain that ACCIONA will seek to limit their costs; resulting in a deterioration of performance; ultimately resulting in NLWA having to terminate.' (Deterioration of performance is already happening and there is no guarantee that this will improve, none at all). So,

'...Replacing ACCIONA creates significant delivery risks for the project and leads to substantial delay while the works are secured, assessed and a new completion strategy developed and procured.' (substantial delay has already happened and likely to continue as above no guarantee etc. these are the delivery risks that exist and have existed since the initial sole tender was agreed by previous NLWA boards.

'...There is no guarantee of securing a replacement contractor quickly, or one willing to assume responsibility for existing design and construction work.' (but there is guarantee for mixed mechanical recycling, it exists already at Belvedere, for example, see appendices).

<u>The new board is under no obligation or responsibility for existing design and construction work</u> because the contract has already been broken by Acconnia. That is obvious by the fact that NLWA have been conducting clandestine negotiations to redirect such risk as in the report that you are charged with agreeing hastily or pausing, today. Whether it proceeds or not, as this report today, this project is already an existential threat to councils and residents, both financially, and environmentally.

<u>We are not asking for the existing design and construction work to proceed</u>. We are asking for a pause to review the new contract, as the whole 'project' is as we see it, contrary to both the financial and environmental interests of the public.

1) Finances should be referred back to the Public Board for scrutiny on all aspects.
2) Environmental data must be reckoned independently based on maximum recycling (including commercial 'waste' currently sent abroad) and significantly reduced residual 'feedstock' that would render the new super incinerator unnecessary, null&void (with space then for mixed mechanical recycling from the new recycling Edmonton Enfield Ecopark. There is more simply at 7.6
'…In these circumstances, project delivery could (!) become driven by dispute resolution and contractual enforcement rather than a coordinated plan to complete the facility.' Contractual enforcement by who? NLWA, who have already failed to do this? Acconia? Who have already breached contract and strongly resisted management attempts to re-negotiate a contract they have controlled from the start

(including not allowing NLWA on to the site until very recently!) NLWA management are in no position to enforce contract or claim damages, nor is Acconia.

Both parties in the current dispute that NLWA seek to resolve by this board agreeing to this report, are untrustworthy and must be challenged by independent scrutiny. Today we are not asking you to seek termination, only today to take a pause, to adjourn, to consider these further actions.

It is my view that NLWA management have misled the NLWA board by refusing to release data publicly on claims that there is no alternative to new incineration. The only reason given that mechanical/laser mixed recycling is not possible to even be considered, is that there is ‘not enough space’ at Edmonton Enfield, because of the new incinerator being built (!) .

We have and can again show that this and other actions to maximise recycling across the boroughs sooner, cheaper and more environmentally friendly by any measure, than this fraudulent H&PP, is possible, and that you and your predecessors have been tricked into believing this is the only way forward.

This is a clear decision you have to make today. Continue the existing fraudulent project or take a pause to review independently and without bias, the alternative, that would decommission the existing incinerator sooner, and replace it not with another super incinerator, but with a spread of options to reduce residual to minimise true waste only and maximise recycling streams further for a true ‘Enfield Ecopark’, and Ecoparks across the 7 boroughs.

So what are the true risks, financially & environmentally to agreeing this report and new dodgy off the hook contract today? NLWA/LEL management are using scare tactics that do not match reality because they are embedded in this whole process, that so far has been a failure. A failure of trust and of duty of care for public health and the public purse. Extra cost incurred already on on legal advice and process that Acconia refused to engage with for, how long? Do you know, any of you who have been here for some time? I would say at least two years since it was apparent that works had slowed, workers reduced, clarity around the apprentice scheme, workers seen going to and from regular breaks. Claims I have received in writing e.g. of 250 workers on site, that are misrepresentations that have been fed to this board for years playing on your perceived ignorance and fear.

The existing incinerator is now going to run to at least another 3 years delay, to 12/29, and management have provided no plans, I repeat, no plans, for the magic of carbon capture that has not been proven anywhere to succeed along with a random 50% recycling target by a random year (2030/35/40? 50 even?) and when recycling targets have been falling across all the boroughs and there is no serious plausible or consistent recycling management across the 7 boroughs, blamed on councils, when NLWA could have driven this decades ago to max recycling reuse repair and thus, now in another 3 years easily make a new ‘super’ incinerator unnecessary.

Pausing and reviewing can happen today, if you have the nerve to challenge NLWA management. Termination of this contract (now these contracts) is not what you think and not what this report has led you to think and believe, by implied threat. Acciona have no

grounds to sue because they themselves are sueable. NLWA mgmt could not sue because they themselves are sueable. The only way is for NLWA to admit they have been wrong from the outset, in planning, tendering and now re-contracting.

To refuse to agree this report today is not a risk. The risk is allowing this doomed and failed project to proceed any further.

appendices with reference to the report and outstanding/updated information to consider:

1) The over-riding claim in this report is that: 'This infrastructure supports the Authority's circular economy ambitions and aims to secure the most environmentally responsible and cost-effective long-term outcome for north London residents.'
NLWA's claim that the new Edmonton incinerator will have the "best environmental controls" is not substantiated. The plant will have modern pollution controls, including relatively good NOx controls, but that does not mean it will achieve the lowest emissions possible. For example, its permitted limits for sulphur dioxide, hydrogen chloride, ammonia and dioxins are higher than the upper ends of the Best Available Techniques (BAT) ranges for new incinerators. Edmonton was originally permitted in 2017, so its 2023 permit review applied the less demanding requirements for existing plants, despite it being newly constructed. Its NOx limit of 80 mg/Nm³ is relatively stringent, but is still above the lower end of the BAT range. The plant may perform better than its permit requires, but NLWA has not demonstrated that it will achieve the best emissions performance. This matters because there may be scope to reduce emissions further.

Edmonton permit, pp. 45-49: https://ukwin.org.uk/library/48-PermitVariation-2023.pdf
2019 BAT Conclusions, Tables 5-7:
https://www.legislation.gov.uk/eudn/2019/2010/annex/division/1/division/1.5/adopted

2) Incineration is a leakage from the circular economy, as per: https://ukwin.org.uk/oppose-incineration/#circulareconomy

3) Why is so much of the report confidential? who did the review? to what remit? drawing on what sources while there is no consideration of the environmental impact of unnecessary incineration eg in terms of destroyed resources and climate change; no recognition that a huge incinerator development creates perverse incentives to burn (especially when so expensive and over budget); and no recognition of national and London targets and goals or even the NLWA's own Joint Waste Strategy. A reduction in size now or an approach allowing a systematic reduction over time could be a huge environmental benefit.
4) NLWA's own Joint Waste Strategy (p.59) says that 32% of household residual waste was food waste, including 24% avoidable food waste, with another 15% comprising materials that could already have been recycled using existing household services. Yet its target is only to halve the proportions of these materials in residual waste by 2040. There is also scope to improve kerbside collections, and the Resource Recovery Facility does not comprehensively sort all mixed household residual waste before incineration.
https://www.nlwa.gov.uk/sites/default/files/2025-12/north_london_joint_waste_strategy_2025-2040.pdf
Furthermore, NLWA's own assessment identified the potential to recover another 38,600 tonnes annually through mechanical pre-sorting of residual waste, although it considered this too

expensive. This shows that further recovery is technically possible, even if NLWA has chosen not to invest in it.
https://www.nlwa.gov.uk/ourauthority/consultation-responses/consultation-uk-emissions-trading-scheme-scope-expansion-waste

Describing waste as material that cannot realistically be recycled risks confusing the limitations of current collection and sorting arrangements with what is actually recyclable.

5) NLWA waste education and prevention: Published financial forecasts showed the budget for waste prevention and recycling initiatives falling from £2.67 million in 2026/27 to £1.02 million in 2028/29. A sustained, adequately funded programme to reduce waste and increase recycling should be a central priority. The claim that the strategic rationale remains unchanged is surprising given how much waste policy has changed since Edmonton was conceived. This includes the statutory target to halve residual waste per person by 2042, compared with 2019, and the Government's December 2024 assessment of residual waste treatment capacity.
https://www.gov.uk/government/publications/residual-waste-infrastructure-capacity-note/residual-waste-infrastructure-capacity-note

6) The new incinerator has capacity for 700,000 tonnes annually, despite the seven boroughs currently delivering around 560,000 tonnes of residual waste. More importantly, paragraph 8.3.4 acknowledges that NLWA has revised its long-term residual waste forecasts downwards, but does not provide the revised figures. Without those figures, it is difficult to see how NLWA can justify its claim that the facility remains appropriately sized to accommodate waste reduction and increased recycling. In particular, NLWA should demonstrate how its forecasts of residual waste requiring incineration are compatible with achieving the statutory 2042 residual waste reduction target. Population growth cannot simply be relied upon to justify additional incineration capacity without accounting for the required reduction in waste per person.

7) Any update on the carbon capture element. e.g. proposed technology, proposed means of transporting captured carbon, proposed destination for long-term storage of captured carbon? Being designed to accommodate carbon capture is not the same as having an operational carbon capture system. The report provides no firm timetable, funded delivery plan or confirmed arrangements for transporting and permanently storing captured CO_2. In the meantime, the incinerator will emit fossil CO_2 from burning materials such as plastics. Carbon capture readiness should not be presented as an established environmental benefit when there is no certainty that carbon capture will actually be installed.

8) Frith report NLWA have depended on cherry picks scenarios https://thisislca.com/wp-content/uploads/2024/11/Appendix-1-JWS-Waste-Projections.pdf A or B Prediction A Residual waste arisings are modelled to increase to c.830ktpa (assumes no change in recycling % and growth from GDP and population & flats housing)

Prediction B Residual waste arisings are expected to be c. 650ktpa. (assumes some less packaging from EPR) How does the modelling take into account the halving of residual waste, for example? It was sized ages ago before modern measures were announced and before current recycling and residual waste reduction targets. See: https://stop-edmonton-incinerator.org/urgent-request-for-a-pause-and-review-of-the-plans-for-the-new-edmonton-incinerator/ to see how the new incinerator is vastly oversized.

10) Is there any assurance that under no circumstances would a North London incinerator accept imported waste (e.g. in the form of RDF or SRF) because they know they rely on importing waste to keep the incinerator feedstock going, and that if they didn't they'd have to burn EVEN MORE of North London's recyclables than is already likely going to be the case creating an incinerator which they know would rely on importing waste from far afield and burning recyclables as is currently the case. Indeed, paragraph 8.4 expressly discusses accepting commercial waste and waste from neighbouring authorities to generate income. NLWA therefore appears happy to promote the environmental benefits of avoiding waste exports while considering waste imports to help finance its incinerator.

11) at 2.15. 'The facility will operate under a strict environmental permit issued by the Environment Agency and will be subject to continuous emissions monitoring and regulatory oversight throughout its operation.'
How can we be sure NLWA is monitoring emissions either accurately or at all as this has not been the case to date, including serious breaches only admitted on FoE and even then is this accurate/independent? while not all emissions are monitored continuously, e.g. dioxins anyway so how can we believe NLWA assurances over pollution and health around the new super incinerator?

12) The claim that the incinerator will provide low-carbon heat overlooks its fossil CO_2 emissions. A report commissioned by the Climate Change Committee warned that "Heat produced by unabated EfW plants (i.e. without CCS) is not particularly low-carbon" (p.91).

https://www.theccc.org.uk/wp-content/uploads/2020/12/Local-Authorities-and-the-Sixth-Carbon-Budget.pdf

The claim that Edmonton could supply heat to 60,000 homes and businesses refers to potential
capacity, not confirmed connections or actual heat use. The climate benefits depend on how
much useful heat is delivered, what energy sources it replaces, and whether carbon capture is
eventually installed. https://www.google.com/url?q=https://ukwin.org.uk/library/48-PermitVariation-2023.pdf&sa=D&source=editors&ust=1794131528904334&usg=AOvVaw0uTcicjXUCBRe2u-ufr065

14. Great Blakenham recycling plant reopens after £12m redevelopment - BBC News https://share.google/bsavSsBBex76MuZsl BIFFA operate at Edmonton plastics sorting etc.

15. https://www.bbc.co.uk/news/articles/cm2dwyw2yr7lo this would be the likely outcome of going ahead except on a far greater financial scale.

16. https://www.westminsterwaste.com/recycling/dry-mixed-recycling/ mechanical/laser sorted for recycling before going to incineration and with packaging reforms food waste collections re-use repair reduce and constantly developing technology incineration and soon, incineration will no longer be necessary we will be diverting from both landfill and incineration.

17. At 10.1. 'The report also details perceived failings by the contractor beyond those external factors together with contract monitoring failures on the part of the NLWA itself and acknowledges the substantial legal disputes that have arisen between the contractor and NLWA to date.' Clearly admitted untrustworthiness between NLWA/Acconia and public cannot so easily be set aside such as: 7.14 'These changes are intended to strengthen delivery confidence, improve decision-making and ensure that cost, schedule, risk, change and operational readiness are managed through a fully integrated framework which encourages collaboration within the delivery team and NLWA's delivery partners especially ACCIONA.' throughout the document again vague intentions provide little confidence in future progress and demand transparency over decisions around dismissed alternatives for open re-consideration, notably those provided previously by STEIN!.

Thank you, Malcolm Stow belongs to [redacted] & STEIN!

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