**Assumptions to be brought into the open about Edmonton**

*S Charles 1st Sept 2021*

**The current NLWA plans for the incinerator are based on these assumptions:**

**1.      Carbon emissions from biodegradables** – that incinerating biodegradables emits Zero carbon.

**2.      Defra waste legislation** – that this will not suceed at all and people will actually increase their waste volumes

**3.      Recyclables from black bags** – that the machinery for this, being sold, and in operation now, does not work

**4.      UK Grid decarbonisation** – that this will not happen

**5.      Carbon Intensity Floor** – That the Mayor won’t be able to act to rectify when this is not met

**6.      Cost of waste to feed incinerators** – that this can be bought in at low cost when the new treatment streams need more waste than North London provides to keep them working

**7.      Carbon Capture and Storage** – that this will work and be economically viable to be added to the plan

**8.      Jobs** – that the incinerator will provide a significant number of local new jobs and apprenticeships.

**9.      UK taxes on incineration** – that these (eg Emissions Trading Scheme ETS) will continue to exclude electricity from waste.

**10.     Non Regulated pollutants** – that recent research indicating serious health risks can be discounted

**11.     Heat to Enfield, Haringey and Hackney** – that this would be low carbon and is a prioritised aim of the project

Where the powers that be any of these are not an assumption then they are admitting their plan is flawed, as these are ‘baked in’. If they confirm publicly that these are basic assumption then support, from people who trust the NLWA without questioning the assumptions, could crumble.

In particular the assumption on carbon emissions from biodegradables is tricky. NLWA can point out that IPCC rules are to ignore it in international carbon accounting. NLWA also routinely diverting the topic to landfill comparisons, rather than recycling comparisons.

**Further information per point and the associated risks** (these should be clearly stated in a Risk Assessment).

1. **Carbon emissions from biodegradables** – the [IPCC](https://www.ipcc.ch/site/assets/uploads/2018/02/ipcc_wg3_ar5_annex-iii.pdf) (p7) does advise to not count emissions in National reporting from turning biomass, including household waste into ‘bioenergy’ (as per incineration). Equally the [IPCC FAQ: Do the IPCC consider biomass used for combustion carbon neutral?](https://www.ipcc-nggip.iges.or.jp/faq/faq.html) says “*The approach of not including these emissions in the Energy Sector total* ***should not be interpreted*** *as a conclusion about the sustainability or carbon neutrality of bioenergy*.”

So it is the emissions prior to arriving at disposal site, including the growth stage (negative sequestration), transportation, packaging and collection stage, that are considered to be accounted for Nationally under other categories. However emissions from biodegradables during the disposal stage still emits carbon - high for incineration for electricity and heat but low for anaerobic digestion. So emissions from food and garden waste cannot be ignored. **RISK**: The excessive carbon emissions from incinerating waste instead of alternative treatments eg anaerobic digestion damages our planet.

**2.      Defra waste legislation** – this Government legislation has reached an advanced stage of legislation with a start date of 2023 for moving much ‘waste’ from incineration streams to be recycled (or digested for biodegradables). **RISK**: that even before the incinerator is commissioned there will be very little volume to burn and the investment will be a white elephant.

**3.      Recyclables from black bags** – There are many examples of already working plants with similar capacity to Edmonton, and the waste mechanisation industry is geared up to focus more on this than incineration. **RISK**: North London will remain unable to retrieve valuable materials that have been thrown away or contaminated in the recycling stream.

**4.      UK Grid decarbonisation** – The Government’s 10 point plan is to increase low carbon electricity significantly, and investors and citizens are increasingly demanding that we have zero carbon electricity. **RISK:** The UK will be unable to demonstrate leadership in decarbonisation in the lead up to COP26 encouraging other countries to also delay - whilst devastating weather events escalate catastrophically.

**5.      Carbon Intensity Floor** – Current calculations showing that the ceiling of **300g CO2e/kwh** by 2030 can be met are theoretical and based on assumptions that are out of date. If these are not met in practice the incinerator will continue to emit unacceptable levels of carbon emissions. **RISK:** As above excessive emissions are already causing adverse weather events.

**6.      Cost of waste to feed incinerators** – Currently Denmark buys in waste from the UK as it has overcapacity. The UK is also heading for a massive overcapacity so companies will be pushing up prices to buy in any waste available. **RISK:** Edmonton waste streams will have insufficient feedstock and not be viable.

**7.      Carbon Capture and Storage** – Although CCS is recommended by the Committee on Climate Change it is not an established technology and the cost has not been factored in to the Edmonton business case. **RISK:** That CCS will become mandatory for new incinerators and the cost would soar and/or it would not work for many years.

**8.      Jobs** – A small number of apprenticeships and jobs are planned at the Edmonton Eco Park. Recycling as much as possible would create many more jobs. **RISK:** New recycling jobs will go to other parts of the country.

**9.      Incineration tax, carbon charge, inclusion in Emissions Trading Scheme (ETS)** – There is still the potential for legal action, or a policy change to tax Energy from Waste in the same way as electricity from all other sources. **RISK**: If this happens the business case for Edmonton costs will no longer be valid.

**10.     Non Regulated pollutants** – There is an increasing number of studies indicating serious health risks eg from Ultrafine Particles. **RISK:** People around Edmonton will suffer bad health or death. (and be able to prove this in court for damages)

**11.     Heat to Enfield** – Although Enfield, Hackney and Haringey are aiming to have District Heat Networks the heat from an incineration source is already higher carbon than many alternative heat sources. As the grid decarbonises and expands heat source pumps and even individual electric heating will be much lower carbon. **RISK**: Households using heat from Edmonton will incur high carbon emissions and higher bills.