



**SUPPORTING DOCUMENTATION FOR ISH1 AND ISH2**

**FOR THE DEVELOPMENT CONSENT ORDER  
APPLICATION FOR THE ALTERATION AND  
CONSTRUCTION OF HAZARDOUS WASTE AND LOW  
LEVEL RADIOACTIVE WASTE FACILITIES AT THE EAST  
NORTHANTS RESOURCE MANAGEMENT FACILITY,  
STAMFORD ROAD, NORTHAMPTONSHIRE**

*PINS project reference: WS010005*

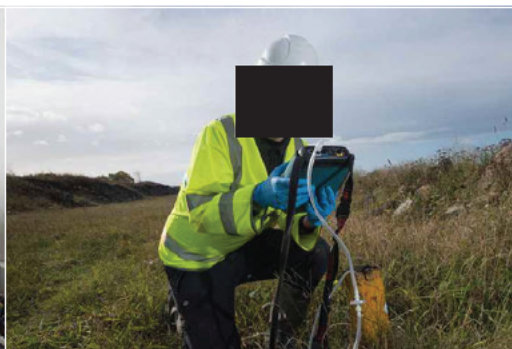
**PINS document reference: 11.3**

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Baddesley Colliery Offices, Main Road, Baxterley, Atherstone,  
Warwickshire, CV9 2LE.

Telephone : 01827 717891, Fax : 01827 718507



## Document reference 11.3

## Supporting documentation for ISH1 and ISH2

**Issue Specific Hearing 1**

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**Issue Specific Hearing 2**

<b>Agenda Item</b>	<b>Supporting document</b>	<b>Annex</b>
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**ANNEX A**

**L VIA VIEWPOINT SUMMARY TABLE**

**DRAWING NUMBER EN0RTH034**

**DRAWING NUMBER EN0RTH035**

**DRAWING NUMBER EN0RTH036**

LVIA Viewpoints where the likely significant visual and landscape effects of Work No. 2 (Waste treatment and recovery facility) and Work No. 3 (Site reception and office area) were assessed regarding existing and potential new built features

Viewpoint Assessed	Location of Viewpoint	Distance from Work Nos 2 & 3	Work No. 2: Waste treatment and recovery facility	Work No. 3: Site reception and office area	Where this is stated in the LVIA (PINS document reference 5.4.14.1, APP-088)	Supplementary Comments
VP1	Jurassic Way, near Royal Oak Pub	Work No. 2: 1.7km, Work No. 3: 2.5km	Not assessed (No views of site)	Not assessed (No views of site)	Page 103	
VP2	FP MX18, west of Collyweston Quarry	Work No.2: 1.3km, Work No. 3: 2.0km	Not assessed (No views of Area 2)	Not assessed (No views of Work No. 3)	Page 104	
VP3	FP MX15, west of site	Work No. 2: 500m, Work No. 3: 1.2km	Assessed	Not assessed (No views of Work No. 3)	Page 107 <i>Views of the waste treatment and recovery facility, specifically the silos within the north-eastern part of this area, [the development site] would continue for a longer duration than would otherwise be the case, due to the Proposed Development. In addition, the silos may be moved to another location within the treatment facility as part of the longer-term operational requirements. This would cause some minor visual effects but when compared with the existing visual context, and the fleeting nature of the view for Footpath users crossing this gap in the woodland blocks, the Significance of Effects would not be of a major level. As noted above, views of the silos and other infrastructure within this area would, at some point, be screened by the evolving landfill landform.</i>	<p>The silos at the waste treatment and recovery facility are approximately 14m high and if the silos were moved anywhere within the footprint of Work No. 2 there would only be minor visual effects.</p> <p>As stated in the Applicant's response to Q8.1.3 of ExQ1 (REP2-006) if a building 120m by 102m with a height of 15m is constructed on the waste treatment and recovery facility, whilst the massing would change from the current situation, the conclusions of the LVIA with respect to VP3 would not change (i.e. visual effects would be of minor adverse significance). The views from VP3 are transient, not oriented towards the site and are limited to an approximately 52m stretch of Footpath MX15, beyond which to the north and south, the route enters well established woodland which effectively screens views of the waste treatment and recovery facility, even in winter. All structures in Work No 2 would be removed before the final phase of landfilling (Phase 11) is carried out.</p> <p>A photomontage has been prepared to show a 15m high building of 120m x 102m in Work No. 2 (refer to Drawing No. ENORTH035) [Document reference 11.3]</p>
VP4	FP MX13 to southwest of site	Work No 2: 950m, Work No 3: 1.3km	Not assessed (No views of Work No 2)	Not assessed (No views of Work No 3)	Pg 110	
VP5	Stamford Rd, near Westhay Lodge	Work No 2: 1.4km, Work No 3: 750m	Not assessed (No views of Work No 2)	Not assessed (No views of Work No 3)	Pg 112	
VP6	BW NE8 to southeast of site	Work No 2: 1.7km, Work No 3: 1.0km	Not assessed (No views of site)	Not assessed (No views of site)	Pg 114	
VP7	Willow Lane, north of Kings Cliffe	Work No 2: 2.1km, Work No 3: 2.0km	Not assessed (No views of site)	Not assessed (No views of site)	Pg 115	
VP8	BW NE25 northeast of Kings Cliffe	Work No 2: 2.6km, Work No 3: 2.0km	Not assessed (No views of site)	Not assessed (No views of site)	Pg 116	

Viewpoint Assessed	Location of Viewpoint	Distance from Work Nos 2 & 3	Work No. 2: Waste treatment and recovery facility	Work No. 3: Site reception and office area	Where this is stated in the LVIA (PINS document reference 5.4.14.1, APP-088)	Supplementary Comments
VP9	BW NE8 northeast of Kings Cliffe	Work No 2: 2.3km, Work No 3: 1.6km	Not assessed (No views of Work No 2)	Assessed	Pg 118  <i>The existing 7.9m high building is either not visible or barely discernible from this location and at all points along this PRow. Therefore an additional 8m high building placed anywhere within Work No. 3 would be similarly inconspicuous in the view and is very likely to be missed by PRow users.</i>	Further clarification was provided in the Applicant's response to Q8.1.3 of ExQ1 ( <b>REP2-006</b> ). The maximum height assessed in the LVIA is shown for the 7.9m high storage shed which is currently in the site reception area (PINS document reference 2.6. <b>APP-009</b> ). It is unlikely that it will be necessary to have additional buildings of this height and size but the storage shed will need to be retained for the duration of the operations. If an additional storage shed of similar dimensions were constructed, or a replacement storage shed was constructed in a different location, with the existing shed removed, this may increase the visual effects on PRow users to a limited extent but would not change the conclusions in the ES regarding their significance into the unacceptable category, when the baseline context is taken into account. For the smaller buildings within Work No 3, there is no limit to the numbers or locations of buildings (typically single or double height portacabin type structures) that could be constructed as the buildings would not be visible so there would be no visual effects.
VP10	FP NE20 northeast of Kings Cliffe	Work No 2: 2.5km, Work No 3: 1.9km	Not assessed (No views of the site)	Not assessed (No views of the site)	Pg 120	
VP11	FP NE20 near Bedford Purlieus Wood	Work No 2: 2.7km, Work No 3: 2.1km	Not assessed (No views of Work No 2)	Assessed	Pg 122  <i>The existing 7.9m high building is either not visible or barely discernible from this location and at all points along this PRow. Therefore an additional 8m high building placed anywhere within Works Area 3 would be similarly inconspicuous in the view and is very likely to be missed by PRow users.</i>	Further clarification was provided in the Applicant's response to Q8.1.3 of ExQ1 ( <b>REP2-006</b> ). The maximum height assessed in the LVIA is shown for the storage shed which is currently in the site reception area (PINS document reference 2.6. <b>APP-009</b> ). It is unlikely that it will be necessary to have additional buildings of this height and size but the storage shed will need to be retained for the duration of the operations. If an additional storage shed of similar dimensions were constructed or a replacement storage shed was constructed in a different location, with the existing shed removed, this may increase the visual effects on PRow users to a limited extent but would not change the conclusions in the ES regarding their significance into the unacceptable category, when the baseline context is taken into account. For the smaller buildings within Work No 3 there is no limit to the numbers or locations of buildings (typically single or double height portacabin type structures) that could be constructed as the buildings would not be visible so there would be no visual effects.

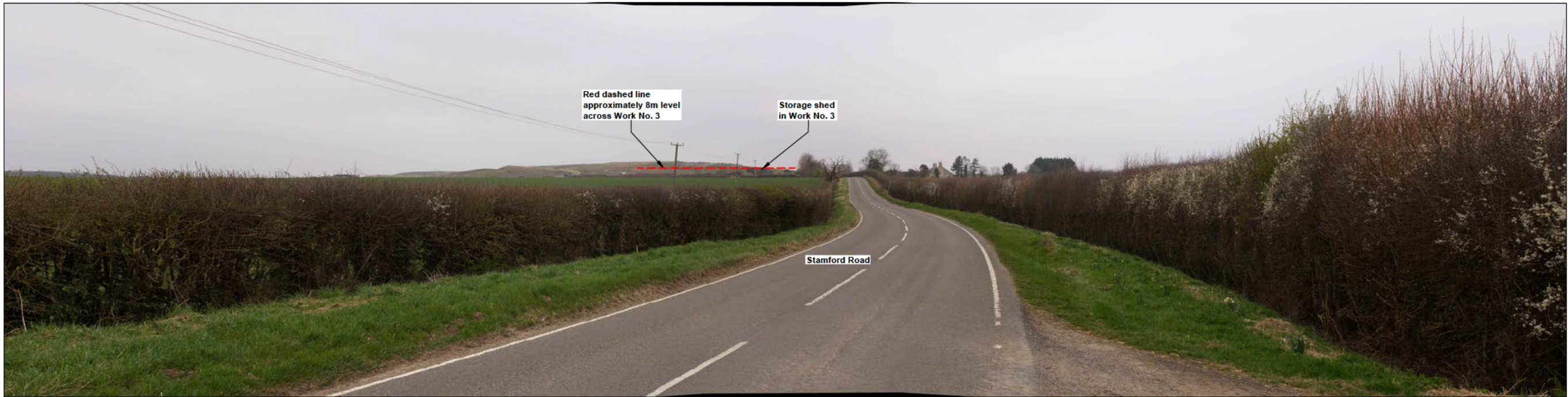
Viewpoint Assessed	Location of Viewpoint	Distance from Work Nos 2 & 3	Work No. 2: Waste treatment and recovery facility	Work No. 3: Site reception and office area	Where this is stated in the LVIA (PINS document reference 5.4.14.1, APP-088)	Supplementary Comments
VP12	Junction of FP MX18 & FP MX15 west of site	Work No 2: 750m, Work No 3: 1.5km	Not assessed (No views of Work No 2)	Not assessed (No views of Work No 3)	Pg 123	
VP13	The Barn property, west of Westhay Lodge	Work No 2: 1.2km, Work No 3: 700m	Assessed	Not assessed (No clear views of Work No 3)	Pg 126	<p>Further clarification was provided in the Applicant's response to Q8.1.3 of ExQ1 (<b>REP2-006</b>). For residents at The Barn and Westhay Lodge, the existing scale of the landfill within the view and the current visibility of various infrastructure/ buildings influences the context in which any new development would be viewed. In addition, the storage shed within Work No. 3 is partially screened by intervening vegetation for views from the garden to the immediate west of The Barn property, and is not visible from within the property itself.</p> <p>If an additional storage shed of similar dimensions were constructed, or a replacement storage shed was constructed in a different location, with the existing shed removed, this may increase the visual effects to a limited extent but would not change the conclusions in the ES regarding their significance into the unacceptable category, when the baseline context is taken into account.</p> <p>For the smaller buildings within Work No 3, there is no limit to numbers or locations of buildings (typically single or double height portacabin type structures) that could be constructed as the buildings would likely not be seen and even if the top parts of the buildings were partially visible, the visual effects would be of a Negligible - Minor level.</p>

Further viewpoints for additional clarification

The locations of Viewpoints A and B are shown on drawing reference ENORTH034

Viewpoint	Location of Viewpoint	Distance from Area 2 and Area 3	Area 2: Waste treatment and recovery facility	Area 3: Site reception and office area	Comments
VPA	Stamford Rd, c. 285m north of Westhay Lodge	Work No 2: 1.1km, Work No 3: 445m	No views of Work No 2	Views of Work No 3	The existing 7.9m high storage shed in Work No. 3 can be seen from this viewpoint. The building occupies a very small proportion of the view. As stated in the Applicant's response to ExQ1 8.1.3 [ <b>REP2-006</b> ] due to the landfill in the background,

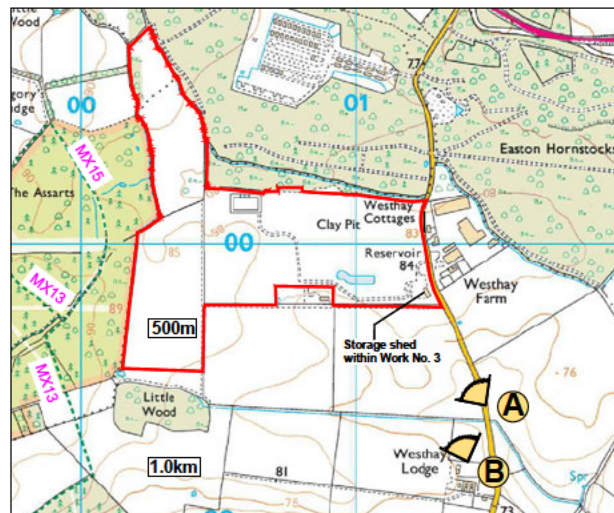
					<p>the shed does not emerge above the skyline which reduces its visibility to some extent and it does effectively merge into the operation as a whole. In addition, due to the height of the roadside hedge the majority of views of the site from the road are restricted. If an additional storage shed of similar dimensions were constructed or a replacement storage shed constructed in a different location, with the existing shed removed, this may increase the visual effects on road users to a limited extent but would not change their significance into the unacceptable category, when the baseline context is taken into account, including the low sensitivity of the majority of road users.</p> <p>For the smaller buildings within Work No 3 there is no limit to the numbers or locations of buildings (typically single or double height portacabin type structures) that could be constructed as the buildings would likely not be seen and even if the top parts of the buildings were partially visible, visual effects would be of a Negligible level.</p>
VPB	Paddock in northern field owned by residents of The Barn, occasionally used by B&B guests for dog walking	Work No 2: 1.2km, Work No 3: 615m	No views of Work No 2	Views of Work No 3	<p>The existing 7.9m high storage shed in Work No. 3 is partially visible from this viewpoint. The building occupies a very small proportion of the view. As stated in the Applicant's response to ExQ1 8.1.3 [REP2-006] with respect to the view for residents at The Barn and Westhay Lodge, the existing scale of the landfill within the view and the current visibility of various infrastructure/buildings provides the baseline visual context. If an additional storage shed of similar dimensions were constructed, or a replacement storage shed was constructed in a different location, with the existing shed removed, this may increase the visual effects to a limited extent but would not change their significance into the unacceptable category, when the baseline context is taken into account.</p> <p>For the smaller buildings within Work No 3, there is no limit to the numbers or locations of buildings (typically single or double height portacabin type structures) that could be constructed as the buildings would likely not be seen and even if the top parts of the buildings were partially visible for residents or guests of The Barn B&amp;B, visual effects would be of a Minor level.</p>



Additional Viewpoint A (Stamford Road, approximately 445m from storage shed in Work No. 3): Existing View



Additional Viewpoint B (Paddock/dog walking field of The Barn, approximately 615m from the storage shed in Work No. 3): Existing View



Additional Viewpoints A & B Location Plan (Not to scale)

Client		
Site	ENRMF	
Project	PROPOSED WESTERN EXTENSION	
Drawing Title	ADDITIONAL VIEWPOINT A (STAMFORD ROAD) AND VIEWPOINT B (PADDOCK/DOG WALKING FIELD OF THE BARN PROPERTY) LOOKING TOWARDS WORK NO. 3	
Date	APRIL 2022	Drawing No.
Scale	Not to Scale @ A3	ENORTH034
File Ref.	2204_008_008_ENORTH034_Additional VPs A & B	Revision
		0
		T: 01344 624 709








Viewpoint 3 (Footpath MX15): Existing (Summer) View



Viewpoint 3 (Footpath MX15): Proposed View at the operational stage (Phases 20 & 21) with 15m high building in Work No. 2




Client		
Site	ENRMF	
Project	PROPOSED WESTERN EXTENSION	
Drawing Title	VIEWPOINT 3 (FOOTPATH MX15): EXISTING VIEW AND PHOTOMONTAGE VIEW DURING OPERATIONAL STAGE (PHASES 20 & 21) WITH 15m HIGH BUILDING IN WORK NO. 2	
Date	APRIL 2022	Drawing No.
Scale	Not to Scale @ A3	ENORTH035
File Ref.	2204_008_008_ENORTH035_VP3 & 15m Building	Revision 0
		



Viewpoint 13 (The Barn residential property - garden): Existing View



Viewpoint 13 (The Barn residential property - garden): Proposed View at the operational stage (Phases 20 & 21) with 15m high building in Work No. 2

Client		
Site	ENRMF	
Project	PROPOSED WESTERN EXTENSION	
Drawing Title	VIEWPOINT 13 (THE BARN - GARDEN): EXISTING VIEW AND PHOTOMONTAGE VIEW DURING OPERATIONAL STAGE (PHASES 20 & 21) WITH 15m HIGH BUILDING IN WORK NO. 2	
Date	APRIL 2022	Drawing No.
Scale	Not to Scale @ A3	ENORTH036
File Ref.	2204_008_006_ENORTH036_VP13 & 15m Building	Revision 0
		

**ANNEX B**

**TABLE PRESENTING THE WASTE POLICIES AND TARGETS RELEVANT TO GREEN  
HOUSE GASES AND *NET ZERO***

**Waste policies and targets relevant to Green House Gases and  
Net Zero**

	Policy name	Policy details and targets	Applicant's comments
1.	National Planning Policy for Waste (2014)	This policy was published in October 2014 together with a number of waste management strategies.	This Policy does not include planning policy for radioactive wastes.
2.	The Government Strategy for Hazardous Waste Management in England (2010)	This policy sets out important principles that aim to encourage reductions in hazardous waste arisings and the wider application of the waste hierarchy to the management of hazardous waste.	This policy pre-dates the Hazardous Waste NPS.
3.	Government Resources and Waste Strategy (2018)	<p>This policy includes a commitment to consult on further ways to encourage hazardous waste producers to implement the waste hierarchy.</p> <p>This policy also identifies a number of strategic ambitions:</p> <ol style="list-style-type: none"> <li>1. To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;</li> <li>2. To work towards eliminating food waste to landfill by 2030;</li> <li>3. The government will introduce measures for England to increase household recycling by requiring all local authorities to collect a consistent set of dry materials from households in England; to collect food waste separately from all households on a weekly basis; and to arrange for separate garden waste collection.</li> <li>4. These measures are expected to increase recycling from households from current levels to 65% by 2035. This will support our ability to meet commitments on recycling outlined in the Resources and Waste Strategy and in legislation.</li> <li>5. The United Kingdom is committed to meeting its target of recovering at least 70% by weight of non-hazardous construction and demolition (C&amp;D) waste by 2020.</li> <li>6. To increase the amount of household like material collected from businesses and other organisations in the municipal waste sector so that we can increase recycling of waste</li> </ol>	None of these targets are relevant to the waste accepted at the existing ENRMF or as part of the proposed development.

**Waste policies and targets relevant to Green House Gases and  
Net Zero**

	<b>Policy name</b>	<b>Policy details and targets</b>	<b>Applicant's comments</b>
		overall and achieve targets to recycle 65% of municipal waste by 2035. Our latest best available estimates for recycling in this sector put recycling rates at approximately 43%.	
4.	Waste Management Plan for England (January 2021)	<p>This policy states that Waste Management Plans must:</p> <p>Include the measures to be taken so that, by 2035:</p> <ol style="list-style-type: none"> <li>1. the preparing for re-use and the recycling of municipal waste is increased to a minimum of 65% by weight.</li> <li>2. the amount of municipal waste landfilled is reduced to 10% or less of the total amount of municipal waste generated (by weight).</li> <li>3. Conform to the strategy for the reduction of biodegradable waste going to landfill required by section 17(1) of the Waste and Emissions Trading Act 2003</li> </ol>	None of these targets are relevant to the waste accepted at the existing ENRMF or as part of the proposed development.
5.	Environmental Services Association report (annual - latest version published 2021)	A net-zero greenhouse gas emissions strategy for the UK recycling and waste sector. This report represents the view of the leading waste trade sector body.	Augean is a member of the leading waste trade sector body. However the actions and targets in this report are not relevant to the hazardous waste sector.
6.	Resources and Waste Strategy: Monitoring Progress (November 2021)	<p>Defra's review of the Government's Resources and Waste Strategy (item 3 above) notes that:</p> <p>- In 2019, the waste management sector in England generated an estimated 15.6 million tonnes CO<sub>2</sub>e (MtCO<sub>2</sub>e) of greenhouse gas emissions, 71.1% less than the equivalent figure in 1990 (53.9 MtCO<sub>2</sub>e).</p> <p>- Total emissions were at a similar level in 2019 to 2018. In 2019, the waste management sector accounted for 4.7% of England's overall territorial emissions, down from 8.5% in 1990. These figures exclude recycling and incineration with energy from waste (EfW), as these recovery processes are not considered waste management for the purposes of the National Atmospheric Emissions Inventory. The greenhouse gas</p>	There is no metric for the monitoring and reporting on emissions from the treatment of waste accepted at the existing ENRMF or which will be accepted as part of the proposed development . The approach to reducing GHG emissions is that advanced by the Applicant.

**Waste policies and targets relevant to Green House Gases and  
Net Zero**

	Policy name	Policy details and targets	Applicant's comments
		<p>emissions from EfW were around 6.2 MtCO<sub>2</sub>e in 2019.</p> <p>- In isolation, all waste management processes are emitters of greenhouse gases, but processes such as recycling can contribute to offsetting emissions that might otherwise have arisen. When assessing emissions from waste management, it is important to consider any greenhouse gas savings that may arise through the process of treatment, such as associated with substituting virgin with recycled material, generating energy via incinerating waste, or reducing nitrate fertiliser via anaerobic digestion. The figures provided...above do not account for these savings.</p> <p>- 3.7 million tonnes of hazardous waste was generated in 2018, an increase of 24% from 3 million tonnes in 2010. Commercial and industrial activities are consistently the largest source of hazardous waste.</p>	

**ANNEX C**

**AUGEAN'S APPROACH TO THE APPLICATION OF THE WASTE HIERARCHY TO  
WASTES MANAGED BY AUGEAN**

## **Additional information submitted in response to Agenda Item 6a for ISH2.**

### **Augean's approach to the application of the waste hierarchy to wastes managed by Augean**

The Waste Regulations (England and Wales) Regulations 2011 require the Producer/Holder of a waste to apply the waste hierarchy to their wastes in identifying the most appropriate route for it, according to the characteristics of the waste. This requires identifying the waste management option that meets the highest hierarchical option. However, not all wastes have valid opportunities for recovery, recycling or reuse, hence disposal (for example, by incineration or landfill) remains a valid hierarchical option. This is confirmed in the National Planning Statement for Hazardous Waste.

Augean provides a wide range of services through its treatment, decommissioning, transfer, industrial services, recovery and recycling capability and landfill disposal facilities, and in doing so provides solutions for the handling and treatment of difficult wastes with the aim to optimise and find useful purpose for these materials. Where this is not appropriate, Augean provides safe disposal in highly engineered landfills for wastes that cannot be recycled, reused or recovered, where this is the best practicable environmental option for such wastes.

Augean has specialist treatment and recycling centres that process by-products and waste materials to provide cost effective solutions that span the waste hierarchy for a broad range of hazardous wastes from a wide spectrum of UK sectors at our sites. We provide services which fully utilise assets providing thermal, biological, physico-chemical and mechanical treatment solutions with a focus on generating process residues to appropriate specifications allowing their recycling or recovery as alternative materials and sources of energy for a broad range of process industries.

Augean has significant processing capacity at its two main hazardous waste landfill sites to sustainably treat ash residues from waste and biomass power plants and we continue to provide an important support service to this growing sector. The permits allow the operation of a physico-chemical treatment process to remove the contaminants from soils leaving a clean fraction comprising soil and aggregate which can be reused or used for engineering on the landfills.

The Augean facilities at Avonmouth specialise in the recycling and recovery of:

- Contaminated industrial solvents
- Oils
- Sludges
- Waste Water

The Avonmouth Site has three distillation units that are used to recover solvents from various solvent-based waste streams. The distillate is blended to meet a resale specification and sold back into the market. Avonmouth can offer a toll recovery service (i.e. take a customer's own waste solvent and process it to meet an agreed specification. The recycled material is then returned to the customer for re-use); or also recover solvents to a product specification for onward use in the market (i.e. not sent back to original supplier), with dedicated storage tanks for customers' waste and distillate product.

Our EcoCentre in Peterhead provides thermal, mechanical and chemical innovations to separate the water, oil and solids from oil and gas sector wastes. Oily solids are transferred to a thermomechanical cutting cleaner (TCC) unit for further processing, which recovers oil from the waste. The recovered oil is stored before being used to fuel the TCC process, thus



completely removing the oil from the waste chain and also negating the need for importing virgin fuel oil from elsewhere.

Augean's innovative Port Clarence Waste Recovery Park in Teesside handles a wide range of hazardous wastes including bulk and packaged waste (in drums, IBCs etc), sludges and effluents for recovery and disposal. The site is an integrated waste management facility that uses several complementary processes to recover more waste for reuse, recycling and treatment providing techniques which deliver BAT (Best Available Techniques) for the treatment of hazardous and non-hazardous waste streams using technologies such as stabilisation, bioremediation together with other forms of material recovery.

Despite the fact that it is the producer/holder that makes the decision on the appropriate waste hierarchical option, Augean's environmental management system procedures require that all wastes are subjected to a rigorous technical assessment and testing regime before they are accepted and when they are received.

Controls start before the waste is received by carrying out pre- acceptance checks to ensure Augean can verify the waste type and composition and who has produced it; and to ensure that it is going to be managed according to the most appropriate hierarchical option.

All wastes are subject to Technical Assessment before they are dispatched to ensure that the waste is capable of being effectively handled by Augean; that the appropriate treatment is carried out on the waste; and to ensure that the waste hierarchy is applied. All wastes are checked, tested and verified upon arrival at site to ensure that they are as expected and can be managed safely for treatment followed by recovery or safe disposal in Augean engineered facilities.

Each site has its own set of procedures that is bespoke to the processes that are used to manage every type of waste received at the site and the Augean management system as well as performance against the Augean Environmental Permit and are subject to external verification for compliance and performance.

The data below shows how much waste has been handled by Augean during the last three years for which data are available by different hierarchical options.

<b>Waste management option applied</b>	<b>2019 (tonnes)</b>	<b>2020 (tonnes)</b>	<b>2021 (tonnes)</b>
<b>Re-Use</b>	711.07	5,976.41	1,959.14
<b>Recycling</b>	125,562.93	74,176.94	130,458.27
<b>Waste-To-Energy</b>	650.88	1,988.66	1,982.26
<b>Incineration</b>	241.73	497.23	2,874.43
<b>Landfill</b>	721,699.53	669,079.03	691,710.55
<b>Treatment and transfer for further treatment and/or recovery elsewhere</b>	386,700.85	377,193.81	439,385.4
<b>Total waste diverted from landfill/incineration</b>	10.5%	7.4%	10.6%

Augean's performance in terms of overall sustainability is included in a Corporate and Social Responsibility (CSR) Report which is produced each year and is available on Augean's website. A copy of the CSR Report for 2020 is provided with this submission as Document reference 11.4.

Performance is presented based on a number of industry standards including 'Green Alliance. Indicating Right: Environmental Performance Indicators for the Waste Management Sector' and standard disclosure taken from the Global Reporting Initiative (GRI) Sustainability Reporting Standards