NEWHURST ENERGY RECOVERY FACILITY

Non-Technical Summary

Prepared for: Biffa Waste Services Limited

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DRAWINGS

1.0 Introduction

Biffa Waste Services Limited (Biffa) and Covanta Energy Limited (Covanta) signed a Memorandum of Understanding to jointly develop the Newhurst Energy Recovery Facility (Facility or ERF). Biffa will remain operators of the facility.

Biffa has retained SLR Consulting to prepare a variation and partial surrender to the Environmental Permit (EP) for the Newhurst ERF located near Shepshed in Leicestershire under the Environmental Permitting Regulations 2016 (as amended). The purpose of this variation application is to update the EP to correlate with changes to the planning consent which were approved in 2015, as described in the subsequent sections below.

This document provides a Non-Technical Summary of the proposed changes to the permit including:

- An explanation of what is being applied for;
- A summary of the regulated facilities; and
- A summary of the key technical standards and control measures relating to the proposed changes.

To support this application for a variation, the following documentation is submitted in addition to this Non-Technical Summary:

- Application Forms (Parts A, C2, C3, E2 and F1) and associated appendices;
- Associated Drawings;
- An update to the Environmental Risk Assessment (ERA) and Part 2 H1 ERA;
- An update to the Best Available Techniques and Operating Techniques (BATOT) and associated technical appendices (including the Detailed Air Quality Dispersion Modelling Assessment (AQDMA) and Human Health Review);
- A Fire Prevention Plan (FPP); and
- An update to the Residue Management Plan.

It should be noted that the original Heat Plan required no update as a result of the changes proposed in this EP variation.

1.1 Environmental Permit

The site currently holds an EP (Ref: EPR/TP3036KB) which was originally issued by the Environment Agency (EA) on 8th June 2011 and was most recently varied on 13th December 2013 to reflect the implementation of the Industrial Emissions Directive (IED).

The site is currently regulated under Schedule 1 of the EP Regulations, in Section 5.1, Part A (1) b) – *the incineration of non-hazardous waste in a waste incineration plant or waste co-incineration plant with a capacity exceeding 3 tonnes per hour.*

Although the site has held an EP since 2011 the facility has not been constructed and is therefore not operational at this time. However, the 2011 Permit was based on a previous design, which is now superseded by the 2015 planning consent.

1.2 Pre-Application Discussions

The proposals for this EP variation application were discussed with the EA local officer Mark Revill on Friday 23rd March 2018. The discussions covered the following; proposed changes, type of variation and associated fee, application contents and assessments, programme for submission and timetable for determination.

It should also be noted, that further combined pre-application discussions with Covanta, in relation to the Protos Refuse Derived Fuel Plant (EA Ref: EPR/LP3132/FX), have also occurred with the EA to ensure a consistent permitting approach is taken for both facilities (particularly in regards to having the option of 1 or 2 incineration lines). These pre-application discussions involved Mark Jones, Phil Bridges and Alex Sutherland.

1.3 Planning Application

A variation to the previously approved planning permission was submitted in 2014 and subsequently issued on 26th March 2015 (Ref: 2014/1440/02). The planning decision notice approves the increase in annual tonnage of waste accepted, the removal of the Incinerator Bottom Ash (IBA) cover, changes to general site layout (including the minor movement of the flue stack) and details relating to the number of incineration lines. The changes in the 2015 planning permission have been incorporated into this EP variation application. A copy of the planning permission is included as Appendix C3_4 in Section 1 of this application. Since the issue of the planning permission in 2015, the permission has been implemented through some initial site preparation construction works in June 2015. However, it is noted these planning consent works related only to the site access and that the permit continues to be at the pre-construction phase.

1.4 Procurement Process

At the time of submitting this EP variation application, Biffa and Covanta are in ongoing discussions with a number of technology providers. From the initial discussions, some technology providers have indicated that they would be able to deliver a facility with the proposed plant capacity. However, some of the technology providers have indicated that they would deliver the proposed capacity with a single line facility, whereas other technology providers have indicated that they would propose a two-line facility. Taking this into consideration, Biffa and Covanta are not able to state the number of streams which are being applied for at the time of submission of this application. It is proposed that a pre-operational condition is included within the EP which requires Biffa to confirm the number of streams to be included within the design of the ERF no later than two years prior to commencement of commissioning of the ERF.

1.5 The Site

Newhurst ERF is located at National Grid Reference (NGR) SK 489 181, approximately 5km west of the centre of Loughborough. The site is accessed via the A512 Ashby Road East which is located approximately 60m north of the site, some 300m west of Junction 23 on the M1.

The site location is illustrated on Drawing 001. The Conceptual Site Layout and EP boundary is illustrated on Drawing 002.

The site is located within a semi urban area. To the north, north-west, and north-east of the site lies the A512 Ashby Road beyond which is Shepshed town, located approximately 500m from the site. The land use to the west and south is predominately areas of open space or agricultural land.

To the east of the site lies the M1 Motorway, beyond which lies the Longcliffe Quarry and the Longcliffe Golf Course, located approximately 200m from the site's EP boundary.

The site's environmental site setting is illustrated on Drawings 003 and 004.

2.0 Overview of the Proposed Variation Application

This variation application seeks to make the following changes to the EP:

- Revision of original EP documentation to be consistent with the technology providers tender bid documents;
- Option for either one or two incineration lines, with either option being contained within the building configuration approved under the planning permission;
- Option for either one or two flues (consistent with the number of incineration lines) housed within a single stack (in line with the 2015 planning permission);
- Increase in the total tonnage accepted from 300,000 tonnes per annum (tpa) to 350,000 tpa, in line with the 2015 planning consent and the increase in the design Net Calorific Value (NCV) of the waste incinerated at the facility from 10 MJ/kg to 10.5 MJ/kg;
- Options for NOx abatement reagent (as detailed in Section 5.4.2 below);
- General site layout changes (but no overall change to the ERF building footprint) including the provision of additional air cooling fans, in line with the 2015 planning consent;
- The removal of the previously permitted IBA storage cover, in line with the 2015 planning consent; and
- Amendment to the EP boundary to remove a small area of land to the east of the site to align with the land area leased by Biffa.

2.1 Incineration Lines

As noted in Section 1.4, Biffa would like to develop the option of the EP allowing for either one or two incineration lines. It is proposed that a pre-operational condition is included within the EP which requires Biffa to confirm the number of incineration lines to be included within the design of the ERF no later than two years prior to commencement of commissioning of the ERF. Whichever configuration is opted for, the total annual throughput will be 350,000 tonnes in line with the current planning consent.

2.2 Flue Stacks

The proposed EP variation to the capacity of the facility will result in changes to emissions to air from the stack that serves the waste incineration process. The ERF, as noted above, will be comprised of either a one line or two line facility with emissions to air discharged via either one or two flues housed within a single stack. Therefore, two point source emission points (A1 and A2), the location of which is illustrated on Drawing 002, will need to remain within the EP for the ERF., with the option to remove an emission point if necessary through an EA led administrative variation, once the design of the facility has been fixed. With either facility, the emissions would still be via a single stack/wind-shield, consistent with the 2015 planning application.

The AQDMA submitted as Appendix BATOT7 of the BATOT assesses both scenarios.

2.3 Increased Total Tonnage Accepted

Biffa propose to increase the total tonnage processed on site from 300,000 tpa to 350,000 tpa Biffa acknowledges that the planning permission currently restricts the waste processing rate to 350,000 tpa and the ERF will be operated in accordance with the constraints of the planning permission. In this variation application, the environmental impacts have been assessed on the basis of up to 100% fuel throughput with an NCV of 10.5MJ/kg and 110% of fuel throughput at an NCV of 9.5MJ/kg. This will allow the ERF to maintain its

effectiveness should actual NCV of incoming waste decline in the future (subject to approved changes to planning).

The ERF has been designed to process incoming waste with an NCV of between 7.0 MJ/kg and 14.0 MJ/kg. A firing diagram, for a single stream facility, which presents the range of fuels to be combusted within the ERF is presented in the BATOT (Section 5 of this EP variation application); a two line facility would provide a comparable operating envelope. The nominal design of the ERF will be 43.3 tonnes per hour with a fuel with an NCV of 10.5 MJ/kg. This is equivalent to approximately 417,000 tpa, assuming 110% of fuel capacity and 8,760hours per annum.

The AQDMA, detailed in Section 4.4.1 below, concluded that the increase in total tonnage accepted (total throughput) will result in a lower exposure level than the existing ERF for which the EP was granted. The assessment also concluded that the impact on the environment from the increased tonnage will be similarly reduced.

The updated AQDMA is included in Section 7 of this EP variation application.

2.4 General Site Layout

Since the submission of the original EP application, a number of small changes have been made to the layout of the building (and have been approved in the latest planning permission variation). This EP variation seeks to make the following changes, which are shown on Drawing 002:

- The flue stack has moved slightly such that the base is now within the building layout;
- The office and ancillary accommodation is now housed within the main ERF building, with the 'wing' replaced by a footbridge linking the building with the car park;
- Minor changes to the internal road layout; and
- Minor changes to the sub-station.

2.5 IBA Storage Area

All IBA processing will continue to occur within the confines of the main ERF building. Only the storage of IBA will occur outside in the designated area to the north of the building as illustrated on Drawing 002. The bottom ash from the incineration process will be quenched and directed to the storage area which will benefit from screening 'green' walling. IBA will be stored in this area before being exported off site. The storage of this material externally, to allow maturation, is standard practice across other operational ERF plants. The ERA submitted with this application assesses the risk of this change. This is as approved under the 2015 planning consent.

2.6 Amendment to EP Boundary

This variation application seeks to amend the EP boundary to align it with the land area leased by Biffa. The amendment of the EP boundary requires a partial surrender application to be made to the EA, the details of which are included within Section 3 of this report.

3.0 Partial Surrender

Biffa propose to amend the EP boundary to align it with the lease boundary. This amendment constitutes a partial surrender of an area of land on the eastern side of the site as illustrated on Drawing 005. Application form Part E2 has been completed in support of the surrender application.

3.1 Surrender Test

As specified in Paragraph 14 of Schedule 5 to the EP Regulations, the test for surrender of EP is as follows:

"The regulator must accept an application to surrender an environmental permit in whole or in part under Regulation 25(2) if it is satisfied that the necessary measures have been taken –

a) to avoid a pollution risk resulting from the operation of the regulated facility; and
b) to return the site of the regulated facility to a satisfactory state, having regard to the state of the site before the facility was put into operation."

The objective of this partial surrender application is therefore to demonstrate that these two surrender tests have been satisfied in relation to the partial surrender of an area of land on the eastern side of the site.

This surrender report has been drafted in accordance with, and to satisfy the requirements of, relevant EA Guidance, notably:

- Horizontal Guidance H5 Site Condition Report – Guidance and Templates; and
- Regulatory Guidance Note (RGN) 9: Surrender.

It is considered that the partial surrender constitutes a "low risk surrender activity" as defined in the EA Charging Scheme 2018[1] as:

'Low risk surrender activity' – 'any other activity, in relation to which the operator has received confirmation from the Agency that intrusive investigation is not required in accordance with the criteria in box 1 of "Site condition report – guidance and templates", (H5), version 3, published by the Agency in May 2013.'

3.2 H5 Template – Surrender Sections

The EA's guidance dictates that sections 1.0, 8.0, 9.0 and 10.0 are to be completed to carry out a partial surrender. The following section details the partial surrender of the land on the eastern side of the site.

1.0 SITE DETAILS	
Name of the applicant	Biffa
Activity address	Newhurst ERF, Newhurst Quarry, Shepshed, Leicestershire, LE12 9BU
National grid reference	SK 489 181

[1] The Environment Agency (Environmental Permitting) (England) Charging Scheme 2018, published 21st March 2018

Document reference and dates for Site Condition Report at permit application and surrender	**At permit application:** SLR Ref: 407.0034.00332/SCR 'Newhurst Energy Recovery Facility - Site Condition Report, SLR Consulting Ltd.' **At permit surrender:** SLR Ref: 413.00034.00562 'Newhurst Energy Recovery Facility – Non-Technical Summary.'
Document references for site plans (including location and boundaries)	Drawing 002: Conceptual Site Layout and Environmental Permit Boundary Drawing 005: Area to be surrendered

8.0 Decommissioning and removal of pollution risk	
Describe how the site was decommissioned. Demonstrate that all sources of pollution risk have been removed. Describe whether the decommissioning had any impact on the land. Outline how you investigated and remedied this.	
Checklist of supporting information	• **Site closure plan** • **List of potential sources of pollution risk** • **Investigation and remediation reports (where relevant)** This Surrender Site Condition Report (SSCR) only relates to the amendment of the EP boundary to align it with the lease boundary. It is not proposed to surrender any other activities or any other areas of land located within the EP boundary. Since the EP was issued in June 2011, no construction activities or groundworks of any kind have taken place on site. The baseline conditions established in the SCR submitted with the original EP application are considered to be in line with current site conditions. As no construction activities or groundworks have taken place on site, there are no pollution risks to remove and no decommissioning is required.
9.0 Reference data and remediation (where relevant)	

Say whether you had to collect land and/or groundwater data. Or say that you didn't need to because the information from sections 3, 4, 5 and 6 of the Surrender Site Condition Report shows that the land has not deteriorated.

If you did collect land and/or groundwater reference data, summarise what this entailed, and what your data found. Say whether the data shows that the condition of the land has deteriorated, or whether the land at the site is in a "satisfactory state". If it isn't, summarise what you did to remedy this. Confirm that the land is now in a "satisfactory state" at surrender.

Checklist of supporting information	• **Land and/or groundwater data collected at application (if collected)** • **Land and/or groundwater data collected at surrender (where needed)** • **Assessment of satisfactory state** • **Remediation and verification reports (where undertaken)** No land or groundwater data has been collected since the EP was first issued in June 2011 as there have been no construction activities or groundworks undertaken on site. As stated in Section 8, the baseline conditions established in the SCR submitted with the original EP application are considered to be in line with current site conditions.

10.0 Statement of site condition

Using the information from sections 3 to 7, give a statement about the condition of the land at the site. This should confirm that:

- the permitted activities have stopped
- decommissioning is complete, and the pollution risk has been removed
- the land is in a satisfactory condition.

In summary, there have been no construction activities or groundworks undertaken on site since the EP was originally issued in June 2011. Therefore, the baseline conditions established in the SCR submitted with the original EP application are considered to be in line with current site conditions. There is no requirement for the removal of pollution risks or decommissioning.

To summarise the land is considered to be in a satisfactory state, such that the surrender test requirements of Paragraph 14 of Schedule 5 of the EP (England and Wales) Regulation 2016 have been fulfilled. Therefore this variation seeks to part surrender the land shown in Drawing 005.

4.0 Variation to Permit Conditions

Table 4-1 details the EP conditions that require amendments to accommodate the proposed changes.

Table 4-1
Proposed Variations to EP Conditions (Ref: EPR/TP3036KB)

Permit Condition/Table Ref	Description/Section Name	Proposed Change
Schedule 1 – Operations, Table S1.2	Operating Techniques	Delete all existing references to operating techniques, and replace with the table included as Appendix C3_3 in Section 1 of this EP variation application.
Schedule 2 – Waste Types, Raw Materials and Fuels, Table S2.2	Permitted waste types and quantities for Incineration Plant	Update the maximum quantity from 300,000 tpa to 350,000 tpa.
Schedule 3 – Emissions and Monitoring Table S3.1	Point source emissions to air – emission limits and monitoring requirements	Amend limits for A1 and A2, as detailed in Table 5 (summary of monitoring of emissions to air from stack) of the BATOT document included in Section 5 of this EP variation application.
Schedule 7 – Site Plan		Replace the site plan with Drawing 002, submitted with this EP variation application.

4.1 Type of Variation

4.1.1 Substantial Variation

To determine the type of variation required, the following guidance was consulted:

- EA Environmental Permitting Regulatory Guidance Series, RGN8, Changes in Operation (*withdrawn but still referred to within the Charging Scheme)*; and
- The EA (Environmental Permitting) (England) Charging Scheme 2018.

The proposed variation will constitute a substantial change as specified in RGN8 as:

"'substantial change' is a change in operation of installations which in our opinion may have significant negative effects on human beings or the environment. Certain changes are automatically regarded as substantial, namely:

a) a change in operation of a Part A installation which in itself meets the threshold, if any, set out in Part 2 of Schedule 1 EPR."

Application Fee

As agreed with Mark Revill (local EA officer) the application fee for a substantial variation is £16,774 plus £500 for the advertisement of the application.

4.1.2 Low Risk Surrender

In accordance with the EA Charging Scheme 2018[2], it is considered that the partial surrender constitutes a "low risk surrender activity" as defined as:

'Low risk surrender activity' – 'any other activity, in relation to which the operator has received confirmation from the Agency that intrusive investigation is not required in accordance with the criteria in box 1 of "Site condition report – guidance and templates", (H5), version 3, published by the Agency in May 2013.'

Additionally, EA guidance notes on Part E2[3] states that:

"A 'low risk' surrender application…will include permits where the operation never started".

Application Fee

As stated in the EA Charging Scheme, the application fee for a low risk surrender is £770.

The total amount paid to the EA is £18,044 (BACs Reference: PSCAPPBIFFA147).

[2] The Environment Agency (Environmental Permitting) (England) Charging Scheme 2018, published 21st March 2018

[3] EA Guidance notes on Part E2 – Surrender Application, April 2018.

5.0 Application Contents

5.1 Application Forms

Parts A, C2, C3, E2 and F1 of the EA's EP application forms have been completed in support of this application and are enclosed as Section 1 of this EP variation application. The application forms also required the following additional information:

- Appendix A_1: List of Directors
- Appendix C2_2: Summary of Environmental Management System
- Appendix C3_3: Updated Table S2.1 – Operating Techniques
- Appendix C3_4: Copy of Planning Permission.

5.2 Drawings

The following drawings relate to the variation application and have been updated where necessary:

- Drawing 001: Site Location Plan
- Drawing 002: Conceptual Site Layout and Environmental Permit Boundary
- Drawing 003: Sources Pathways and Receptors
- Drawing 004: Cultural and Natural Heritage
- Drawing 005: Area to be Surrendered

The drawings are enclosed as Section 3 of this EP variation application.

5.3 Environmental Risk Assessment

5.3.1 Original Application

An H1 Environmental Risk Assessment was produced for the original EP application in 2010. As part of this, a Part 1 assessment of the risks to the environment and human health from accidents, odour, noise and fugitive emissions was conducted. In addition to this, a Part 2 assessment of point source emissions and a cost-benefit analysis was conducted.

5.3.2 Variation Application

For the purpose of this variation application the original Part 1 assessment has been reviewed and updated to take into account current EA guidance. The Part 2 assessment has also been updated to reflect the changes from the AQDMA.

The review is currently based only on the changes included within Section 2.0 of this Non-Technical Summary.

Operational procedures will be implemented at the site to monitor and manage amenity risks from the permitted waste management activities and include provision for the management of birds, vermin, insects, litter, mud on road, odour and noise. The impact of the site on surrounding human and environmental receptors is set out in the assessment and the potential receptors are illustrated on Drawing 003 and 004 included in Section 4 of this application.

Subject to the implementation of management measures, it is concluded that the proposed permit variation is unlikely to result in a significant accident risk or risk to the amenity of the local environment or human health.

The ERA is enclosed as Section 4 of this EP variation application.

5.4 Best Available Techniques and Operating Techniques

The original BATOT submitted as part of the original EP application in 2010 has undergone a review and update to ensure ongoing compliance with the IED and relevant new EA guidance. The BATOT details the changes to the ERF instigated by this EP variation application.

The site will continue to be operated in accordance with the BATOT document which details the following:

- Management;
- Site operations;
- Process Controls;
- Emissions and monitoring; and
- Information.

Operational management procedures will ensure that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system and the BATOT;
- Performance against the management system is audited at regular intervals; and
- The EP is complied with.

The BATOT is enclosed as Section 5 of this EP variation application.

5.4.1 BATOT Appendices

- **Appendix BATOT1 – Environmental Policy:** no change from the original application.
- **Appendix BATOT2 – Management Structure:** no change from the original application.
- **Appendix BATOT3 – Flood Risk Assessment:** the original assessment submitted with the 2011 EP application has been updated to take account of recent legislation and guidance. It must be noted that majority of the amended ERF design, as detailed in Section 2 of this NTS, is the same as was originally assessed.
- **Appendix BATOT4 – Global Warming Potential Assessment:** no change from the original application as the principles of the assessment remain the same.
- **Appendix BATOT5 – Typical Water Balance:** has been updated to reflect the changes included in this EP application.
- **Appendix BATOT6 – European Waste Catalogue for Acceptance:** no change from the original application.
- **Appendix BATOT7 – Air Quality Dispersion Modelling Assessment:** a new AQDMA has been prepared for this EP variation application. The assessment of the ERF combustion emissions concluded:
    - There are no predicted exceedances of short-term or long-term EALs at the point of maximum ground level impact or at relevant exposure locations for any of the scenarios assessed;
    - The predicted impact on designated sensitive habitats are considered insignificant and will cause *'no significant pollution'* according to EA guidance; and

  - The model sensitivity assessment shows none of the variations in the parameters investigated lead to exceedances of the EALs or any material change to the overall conclusions of the assessment.

- **Appendix BATOT8 – Ecology Assessment:** an extended Phase 1 survey was repeated and new GCN surveys undertaken to enhance the amount of baseline data available for the planning application submitted and approved in 2015. The original Ecology Assessment and the new surveys are included as Appendix BATOT8 of this variation application.
- **Appendix BATOT9 – Noise Assessment:** the proposed changes to the ERF scheme were re-assessed in the 2014 planning application. Overall, it was concluded that the design changes to the ERF would not lead to any significant impacts and that the ERF could still be operated within the terms of the previous planning consent. The new assessment involved the preparation of a new noise model, which included all items of plant within and external to the ERF building. The new Noise Assessment has replaced the previously submitted report for the original EP application, and is included as Appendix BATOT9 for this variation application.
- **Appendix BATOT10 – Questions as per EPR5.01 (1 – 36):** only minor changes required due to the submission of this variation application. The responses to these questions have been updated and are included as Appendix BATOT10 of this variation application.
- **Appendix BATOT11 – Acid Gas Abatement Assessment:** no change from the original application as the principles of the assessment remain the same.
- **Appendix BATOT12 – NO_x Abatement Assessment:** revisions from the original application were made to be consistent with this permit variation application; however, the principles of the assessment remain the same.
- **Appendix BATOT13 – Human Health Review;** a new Human Health Review has been prepared for this EP variation application. The review concluded that:
  - The findings of the assessment are that the predicted risks and hazards as a consequence of emissions from the proposed ERF are all within limits for the protection of human health as defined by the EA or US-EPA guidance.
  - This conclusion is considered robust on the basis of the worst case approach adopted in the characterisation of emissions, the safety factors incorporated into the US-EPA HHRA Protocol, and the hypothetical worst case exposure scenario considered in the assessment.
- **Drawing BATOT1 – Longitudinal Cross Section:** the original drawing submitted with the 2011 application has been updated to reflect the changes to the layout of the ERF building. The updated drawing, (reference: NH 3/5, dated June 2014) has been included in the BATOT document for this variation application.

5.5 Fire Prevention Plan

Current EA guidance regarding FPPs[4] requires any operator who stores combustible waste to have an approved FPP in place.

The information contained within the FPP for Newhurst ERF aims to meet the following 3 main objectives:

- Minimise the likelihood of a fire happening;

[4] Fire Prevention Plans: Environmental Permits, 9th November 2016

- Aim for a fire to be extinguished within 4 hours; and
- Minimise the spread of fire within the site and to neighbouring sites.

The FPP is enclosed as Section 6 of this EP variation application.

5.6 Residue Management Plan

The Residue Management Plan has been updated to reflect the change to the design of the facility and the increase in annual tonnage.

The Plan is enclosed as Section 7 of this EP variation application.

6.0 Technical Standards and Control Measures

The key technical standards laid out in the following documents govern the design and operation of the site:

- The Environmental Permitting (England and Wales) Regulations 2016 (as amended);
- Developing a management system: environmental permits;
- Control and Monitor emissions for your environmental permit;
- Sector Guidance Note S5.06; Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste;
- EPR 1.01 Combustion Activities; and
- Relevant EA Guidance e.g. Environmental Risk Assessment's, Site Condition Reports, FPPs, Surrender guidance.

The control measures relevant to the proposed changes are described in the BATOT submitted with this application.

The proposals have been assessed against these standards, including BAT requirements required to be updated since the original report was submitted in 2010, and are all considered to meet the relevant technical standards.

The overall conclusion is that there is unlikely to be a significant environmental impact as a result of the change to the activities proposed at the Newhurst ERF.

Biffa is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and in accordance with the Company's Environmental Policy and Management System.

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