

Responses to Question from the CLP following Meeting 14 (29/06/2020)

1) A CLP member would like information to establish the carbon footprint for the construction of the Rookery South waste incinerator and requested details of the following used to complete the plant

- Concrete (how many tonnes?)
- Steel (how many tonnes?)
- Tarmac (how many tonnes?)
- Fuel (for construction vehicles working on site — how many litres?)
- Electricity (for cranes, lighting etc. — how many kWh?)
- Manpower (person-days for everyone working on site).

Answer :

A previous answer included links to *the Covanta website* as follows:

- <http://covanta-csr.com/environment/addressing-climate-change/>.
- management <http://covanta-csr.com/protecting-tomorrow/our-vision-for-sustainable-waste-management/>
- <http://covanta-csr.com/stories/sustainability-policy>

The Member considered these did not address the question and elaborated his question as above. The fuller answer is as follows:

As part of the Development Consent Order (DCO) application, a full Waste and Resources Assessment Tool for the Environment (WRATE) analysis with a carbon assessment was carried out. It states:

“The Carbon Assessment further develops the results of the climate change impact assessment provided in the WRATE report. The assessment identified that the RRF would result in a net carbon saving of 270,937 tonnes CO₂-eq per annum over a landfill baseline option.”

The Environmental Permit Application also contains a greenhouse gas assessment report which compares the Rookery RRF (favourably) with CCGT. Copies of these documents can be found within the DCO planning application and permit application, which are publicly available documents.

When calculating carbon footprints of any energy-from-waste facility (EfW), the full life cycle of a given development must be considered and accounted for. Taking carbon footprints at each phase of development in isolation is not only inaccurate, it can also lead to unfounded conclusions.

In general, the carbon footprint of the construction phase of solid waste management facilities is considered insignificant, when compared to the emissions associated with the waste management processes themselves, especially in light of the long-term viability of EfW facilities.

On a broader scale, energy-from-waste facilities are widely recognised throughout the world as a tool to reduce greenhouse gases. In fact, the [International Panel on Climate Change](#) called EfW a “key greenhouse gas mitigation technology” and the [World Economic Forum](#) identified EfW as “one of eight technologies likely to make a meaningful contribution to a future low-carbon energy system.”

For more information, visit <http://covanta-csr.com/environment/addressing-climate-change/>.

Further reading: Drivers for EfW and EU Directives

EfW is an important part of an overall integrated waste management approach, recognized in the European Union waste management hierarchy as preferable to landfilling for those materials remaining after waste reduction, reuse, and recycling efforts have been exhausted. After recycling takes place, EfW facilities recover energy from remaining waste materials in an environmentally sound manner. While doing so, EfW facilities reduce the need for fossil-based energy and reduce greenhouse gas emissions relative to landfilling.

EfW is a sustainable solution and plays a part in the circular economy by generating energy and recovering metals and aggregates for recycling; burying waste in a landfill is not sustainable. When waste is buried in landfills it decomposes and generates methane. Methane is a very potent greenhouse gas (GHG), over 30 times more potent than CO₂.

Therefore, with the objective of addressing climate change, the European Union has issued a directive to limit the landfilling of biodegradable municipal solid waste to 35% of the quantity landfilled in 1995. EfW is a net reducer of greenhouse gas emissions because it does not create the methane that landfill produces, in addition to offsetting the need to burn fossil fuels in power plants.

- 2) *A CLP member would like information following a recent article in the Guardian which refers to [sic] the huge amount of CO₂ from incinerators, and requested a Covanta response to the article and on the likely level of emissions of CO₂ from the Rookery plant. Source: [Legal challenge over UK's exclusion of incinerators from emissions target](#)*

Answer:

As the Guardian article states, a challenge is being independently brought forward against the Government department, BEIS. At present, the UK Emissions Trading Scheme (ETS), which was created in 2005, will commence in January 2021, with 'installations for the incineration of hazardous and municipal waste' being exempt from the ETS.

It would not be appropriate for operators and developers of energy from waste facilities to comment or speculate further on this challenge, until the legal proceedings have run their course.

- 3) *Query from Stewartby member about Kerb Alignment at Green Lane-Rookery entrance.*

Answer:

Covanta has investigated the kerbing section in question. The alignment work was carried out in accordance with the drawings approved by the Highways Authority, and the Council's clerk of works inspected it on completion. Covanta and the Council (Highways) are satisfied that the kerb alignment is as per the drawings approved by the Council. The Council has signed off the s.278 agreement works relating to the Site access onto Green Lane.

4) *A Member request regarding the postponed CLP visit to Veolia WTS*

Answer:

Veolia is happy to provide site visits to a limited group. Bob Fisher sent out a Doodle Poll with suggested dates for those that wished to attend. The visit took place on 23/09/2020.

5) *A Member asked when the postponed CLP visit to Rookery construction site can be re-scheduled*

Answer:

The Rookery South construction site is still subject to strict Covid-19 mitigation measures. As a result, and to protect all on-site operatives and our near neighbour communities, all non-essential visits are not currently permitted until further Government advice is received.

Once Covid-19 restrictions recede, HZI/Covanta will be happy to arrange further visits for the CLP members in small limited groups.

6) *A Member expressed concern that Veolia mentioned use of subcontracted transport for waste deliveries and wondered how a third party would be managed in order to comply with the Traffic Routing plan.*

Answer: It is standard practice in the waste industry for specialist transport sub-contractors to be used for waste haulage. These companies operate under contract and to the same rules and management controls as vehicles owned by the company. The same is true for waste collection vehicles operated by local authorities. The third-party sub-contractor operates as if it were the contractor.

Veolia notes that they currently work with over 15 haulage companies who either deliver to Veolia's facilities or to third parties' facilities such as Rookery South. The drivers are used to following and complying with traffic/travel management plans and know that if they do not, they will be removed from the list of preferred suppliers.

Most sub-contractors use trackers on their vehicles, not only to ensure that vehicle movements are optimised, but also to check that their drivers comply with the travel and route management plans provided by their employing organisation and the destination sites. The same vehicle tracking system enables waste hauliers to govern their vehicle movements and demonstrate their compliance with their contractual requirements and wider highways regulations.

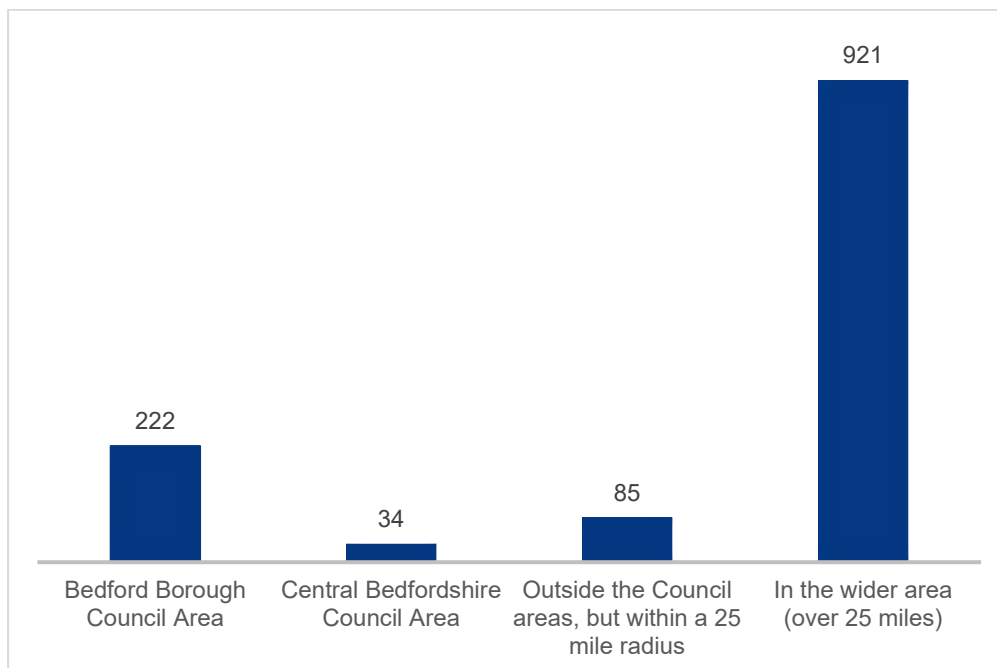
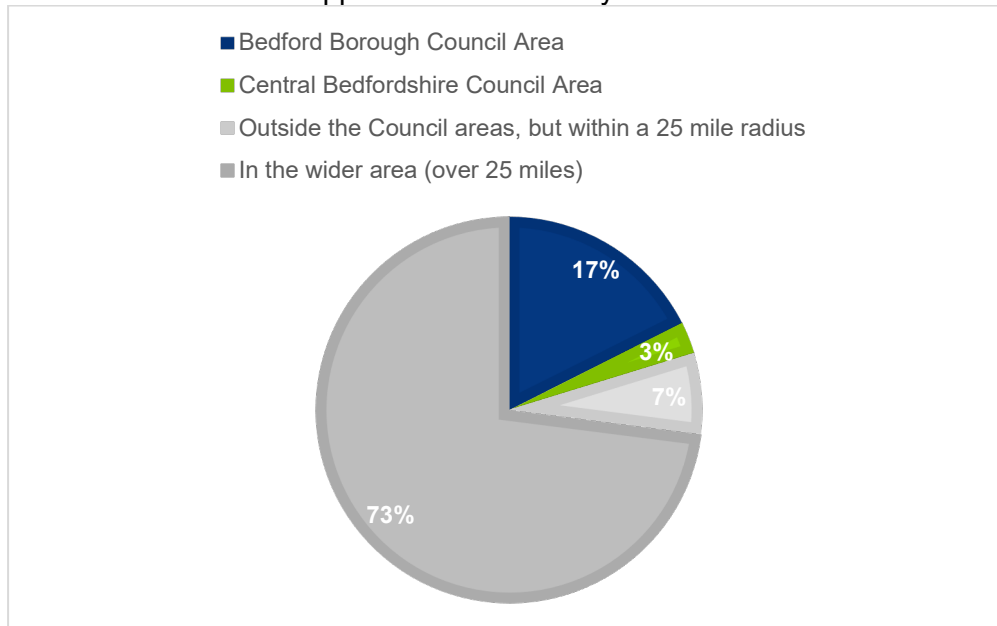
Through periodic inspections and audits, this allows Veolia to investigate any incidents / non-compliance occurrences reported at their facilities or at third party sites. Sub-contractors found to be in breach of the rules will be removed from their preferred suppliers list, usually after 3 occurrences.

Please find attached a statement from Veolia regarding haulage subcontractors.

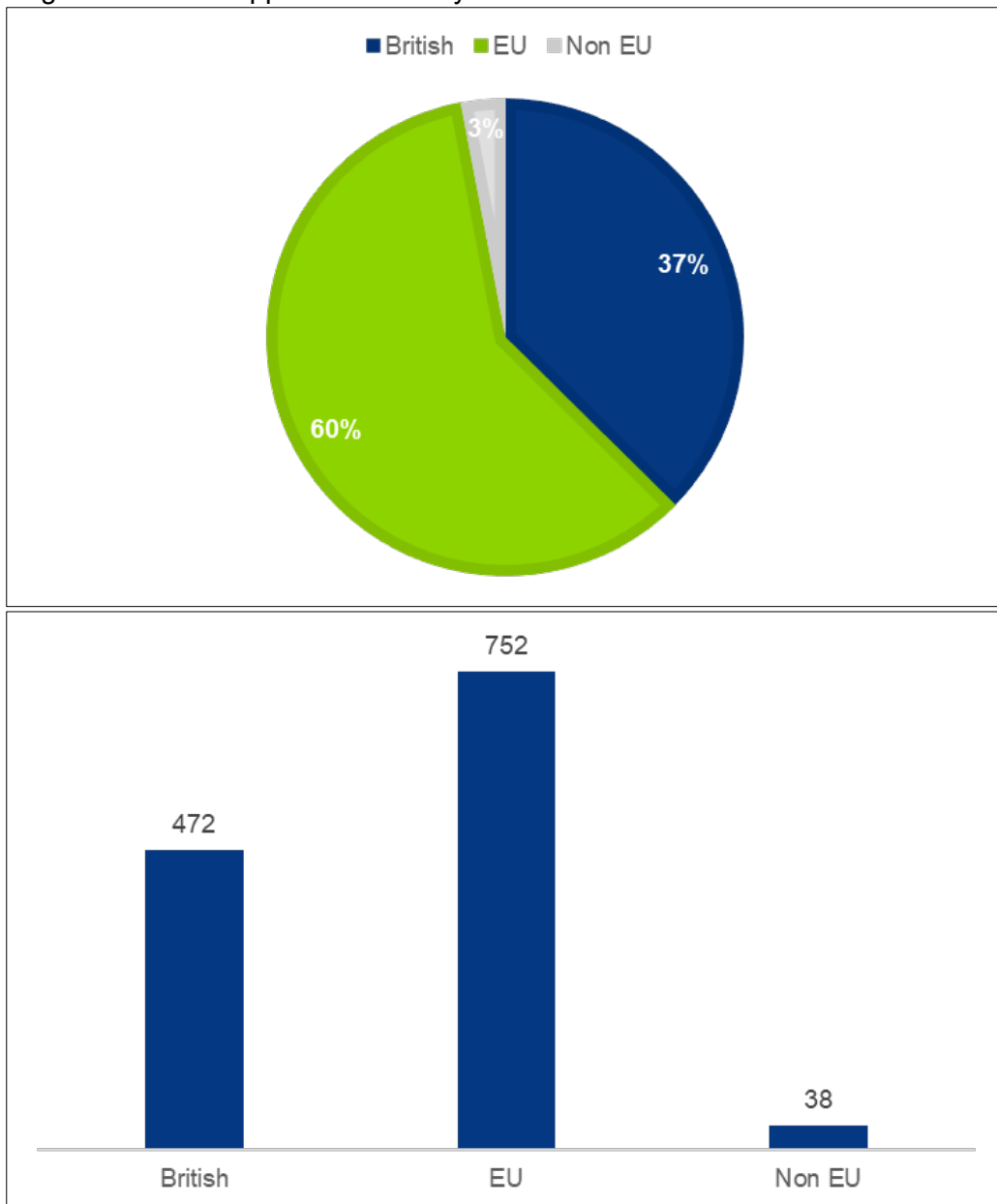
7) A member asked how many of the 600 people employed at the site are local people as there was an initial promise that the project would create jobs locally.

Answer: A presentation was made to the CLP meeting of 14th October 2019. As an update:

Residence of Persons Appointed from January to June 2020



Origin of Persons Appointed January 2018 to December 2019



8) A member asked some questions regarding waste supply and waste transfer:

The member expressed concern regarding the distance from Rookery for the sources of waste being more than 50 miles away with specific reference to the Veolia waste transfer station at Northampton.

Answer:

The Veolia Waste Transfer Station (WTS) at Northampton, which was visited by CLP members on September 23rd 2020, is within the 50-mile radius from Rookery. The operation of this WTS is typical of Veolia operations. Waste is sourced from within a 20-30mile radius of the WTS.

At the CLP meeting of 08/05/2019, the presentation indicated the *likely* sources of waste, being the Veolia depots within an approximate 2-hour travel catchment, as this is the travel time that is both practical and economic, but this is not prescriptive. Travel time from Norfolk (e.g. Kings Lynn, Norwich) in fact falls within the 2-hour travel time also.

The member also asked for confirmation regarding reports that Veolia have won the waste contract for Norfolk, and that this will be processed at Rookery South delivered via WTSs, which means that the waste will be coming from much further away than 50 miles.

Answer: Veolia has recently secured a 6-year contract with Norfolk County Council for the treatment of up to 180,000 tpa of residual (household) waste. Veolia's objective is to maximise diversion from landfill and as there is currently a shortage of treatment capacity in the Norfolk area, Veolia will process those volumes at the Rookery facility. This will not increase the number of vehicle movements as Norfolk's waste will first be tipped at various waste transfer stations very similar to the one in Northampton, and will then be bulked and loaded onto articulated vehicles which will deliver the waste to the Rookery facility. Waste transportation will be optimised by Veolia's logistics team and vehicles movements kept to a minimum. Haulage is a significant cost to Veolia, and we have no benefits in sending more vehicles than needed to Rookery.

Whilst we recognise that Norfolk's waste transfer stations sit outside of the 50 miles radius quoted in previous presentations (and which remains our priority target area for sourcing waste), it is not uncommon for waste to travel such distance to be treated.

Veolia is currently working on bids for Local Authority collection contracts located within the 50 miles radius. However, the timing of the procurement processes for these local contracts are not all aligned with the start of operations at Rookery. Some of the contract opportunities which have come to the market in the meantime, such as Norfolk, are from further afield. Should additional treatment capacity become available in the Norfolk area and Veolia secures enough local waste volume to fulfil its commitment under its Rookery Fuel Supply Agreement, Veolia would potentially consider replacing the Norfolk volumes with local waste.

The member also asked whether the above is consistent with the planning permission and Environmental Permit. Does the EA get involved with this? Does the local planning/waste authority get involved in this matter?

The Development Consent Order (DCO) planning consent does not specify either the sources of waste/fuel or distance from which waste can be delivered to the Rookery South ERF. This is not within the powers of the government, nor indeed the local planning authority, in the same way that they do not control the origins/destinations of vehicles associated with distribution depots. Rather, they seek to control the vehicle numbers and times of travel, which is specified within the DCO.

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Similarly, the Environment Agency is responsible only for regulating the operations of the ERF, not matters associated with transportation, which is the responsibility of planning. The roles of the two regulators are distinct and separate to avoid conflict.

9. *A local resident asked whether the Covanta chimney will stay the orange/red colour or whether an attempt would be made to blend it in with the countryside.*

Answer:

During the project's pre-planning phase to seek a Development Consent Order (planning permission) for the Energy Recovery Facility in 2009/10, Covanta was required to carry out detailed consultations with local communities and statutory bodies (including English Heritage and local councils). These discussions determined key factors such as the number of stacks, their position and the colour of the facility's stacks.

The Design and Access Statement noted that Stewartby brickworks and the four remaining chimneys to the west of the village informed the scale and character of the EfW Facility stack.

Over the course of the consultations with English Heritage, CABE (now merged into the Design Council), Central Bedfordshire and Bedford Borough Councils, the flue stack colour of *Corus Colorcoat HPS200 Ultra 'Matt Terracotta' finished metal cladding* was preferred. The reasons given by statutory consultees was that the preferred palette colour gave similar tonal appearance to the existing Stewartby brickwork chimneys, whilst maintaining a functional and efficient material for the use of the building.

Covanta does not anticipate that the colour of the stacks will change over time once operations begin at the facility in 2022.

Further information on the Development Consent Order and the consultation process undertaken can be found in the Design & Access Statement (Document 6.1) in the project's archive (<https://www.rookerysouth.co.uk/archive-documents>).

10. *A local resident queried the height of the Rookery South ERF Chimney Stack*

Answer:

At its highest point the main facility building will be 50 metres tall. The stacks are required by the Environmental Permit to be 105 metres tall from the base within the Rookery pit.

The stacks that have been erected comply with the Environmental Permit and the details specified on the drawings in the DCO.

However, due to the geography of the Rookery South pit, which is approximately 10-15 metres below the surrounding ground level, this will leave around 90 metres of the stacks above ground level.



Rookery South ERF

Waste deliveries - Haulage sub-contractors

Waste will be delivered at the Rookery South facility through a combination of direct deliveries (collection trucks operating within the vicinity of the ERF) and bulk loads delivered in articulated vehicles run either by Veolia or professional haulage sub-contractors. Please also note that Veolia is responsible for sourcing and supplying volumes up to 70% of the capacity of the facility, and that Rookery South Limited will enter into other fuel supply contracts to fill up the remaining capacity. Therefore, other waste management companies are likely to deliver waste to the facility.

Although Veolia operates the third-largest fleet in the UK, we sub-contract a large proportion of the waste haulage (from waste transfer stations to treatment facilities) as there are areas in the UK where our waste management activity is not dense enough to establish a logistics and haulage base.

Operating walking floor trailers requires expertise, therefore we mainly work with specialist firms carefully selected, and not so much large, general haulage firms such as Eddie Stobart and XPO. We currently work with over 15 haulage companies who either deliver to Veolia's facilities or to third parties facilities. The drivers are used to following and complying with traffic/travel management plans and know that if they don't, they will be removed from our list of preferred suppliers.

Potential suppliers are required to go through a comprehensive pre-qualification process and complete an in-depth sustainable development request for information. This enables us to profile the organisation from a risk perspective and assess their ability to meet Veolia's requirements. They are required to complete a questionnaire which assesses the following capabilities:

- Insurances
- Health and safety
- Quality
- Environment
- Corporate Social Responsibility including Modern Slavery
- Economic Performance and Business Continuity
- Bribery and Corruption
- Facilitation of Tax evasion
- Data Protection (if relevant)

In addition to the above areas, all sub-contract vendors are asked to complete a number of additional questions specific to their operations and practices.

It is important to note that most sub-contractors use trackers on their vehicles, not only to ensure that vehicle movements are optimised, but also to check that their drivers comply with the travel management plans provided by Veolia. It allows Veolia to investigate any incidents / non-compliance occurrences reported to us at our facilities or at third parties'. As mentioned above, sub-contractors found to be in breach of the rules will be removed from our preferred suppliers list, usually after 3 occurrences.

We also track the performance of our sub-contractors through Vendor Performance Reviews, carried out annually. Documents are electronically held for each sub-contractor, including minutes of review meetings held with suppliers, supplier management information and copies of other ongoing communications held with the sub-contractor.

Veolia is currently working on securing volumes to feed the facility and will be selecting its haulage sub-contractors in Q4 2020. We will provide an update as soon as we start the process of appointing them.