

Circle Waste Reporting Policy

June 2022

Circle Waste Ltd aim to provide its customers with up-to-date management information through its online portal website and apps. This Circle Waste Reporting Policy highlights the information available from the system and the sources / calculations used to deliver that data, enabling us to provide the most accurate data that we are capable of providing.

Real time reporting

Our online reporting system is closely integrated with our operating and finance systems, meaning that your information is updated several times per day. Diverted percentages are updated following quarterly waste returns received from the Environment Agency.

Weight reporting

The system uses a combination of methods to generate weight information for reporting purposes. Any services that are priced by weight (for example, transport and tonnage rates, or direct tipping) will be reported based on the weight specified on the weighbridge ticket received from the disposal location. Any non-weight-based services will be reported using WRAP's industry-standard volume-to-mass Conversion Factors 2014. The Conversion Factors are available in the Compliance menu within the system.

Waste Fate Tonnes / Percentages and Diversion from Landfill

Waste Fate / Landfill diversion figures are primarily calculated using the waste returns data supplied by the Environment Agency, NRW, SEPA and NIEA. The data is based on the nearest disposal facility and the EWC code of the waste being disposed.

The methods used are listed below, and are prioritised depending on data availability for every specific job: -

- **Current Environment Agency Data** – We will utilise the Waste Returns data for the specific quarter. Bear in mind that such data is usually not available from the Environment Agency until 6-months after the calendar quarter ends.
- **Most Recent Data** – When current data is unavailable, we will revert to the most-recent landfill diversion data from the Environment Agency.
- **Annual data from 2018** – If we have not received any recent data from a specific disposal facility, we will revert to their 2018 returns data.
- **Average Data for the Waste Facility** – If the EWC from a job does not match any EWCs from the facility's Waste Returns data, an aggregated average for that facility, last-known period and all its waste streams is used instead.
For example, this could occur if the waste removed from site is recorded as Concrete (170101), but the waste facility combined this with other similar waste streams and submitted their returns as Mixed Construction and Demolition Waste (170904).
- **Industry Average by Waste Stream** – As a last resort, we will use an average diversion percentage for all 2018 EA returns, based on the EWC code chosen for the job.

Carbon Emission Reporting - Haulage

The CO₂e data in the system are based on factors provided by the UK Government (*GHG Conversion Factors for Company Reporting – Freight Goods*). The haulage calculations are based on: -

- The driving distance between the customer's site address and the subcontractor's nearest disposal location accepting the specified EWC (waste stream), according to Google Maps,
- The weight of the waste being hauled, as calculated in the *weight reporting* section,
- Classifications of vehicle type / size, including vans, rigid and articulated vehicles of sizes between <3.5tn to >33tn.

Every container in the system is allocated to the vehicle classification that is typically used to service that container. Services that do not involve the movement of waste from the customer's site and a disposal facility will not show a CO₂e figure. Such services can include plant and tool hire, site service hires, documents, administrative charges, labour etc.

The following assumptions are applied to the CO₂e calculations: -

- Containers are always transported using the same vehicle class.
- Waste is hauled using diesel vehicles,
- Distances are based on a direct route, not taking any diversions or detours into account,
- Emissions for jobs where the waste origin is unknown (e.g. Direct Tipping) are calculated using the default distance of 31km. This figure derives from an average distance between our customer sites and disposal locations from orders spanning the last 3 years.
- Note that abnormally high mileage and CO₂e figures may be shown against some specialist services (hazardous / WEEE collections for example), often due to insufficient facilities nearby to process the waste. However, the subcontractor will aim to service several other sites in the local area on that day.

Carbon Emission Reporting - Disposal

The CO₂e data for disposal is based on Conversion Factors supplied by the Government (*Greenhouse gas reporting: conversion factors 2021*). The calculations use different factors for different groups of waste fate / waste stream and is calculated for each job accordingly.

Duty of Care

A range of Duty of Care documents are provided against all orders from within the system, either in PDF format or as a link to third-party / government bodies. Where applicable, such documents will include: -

- Subcontractor's Public Liability Insurance
- Subcontractor's Waste Carriers License
- Disposal Facility's Waste Management License
- Annual Waste Transfer Notes (permanently sited containers only)
- Individual Waste Transfer Notes (where available)

Portal Disclaimer

Circle Waste aim to provide personalised, accurate waste data to each of our customers. To achieve this, we rely on data and formulas from third-party sources, including the Environment Agency and WRAP. In line with their Quality Assurance processes, this data is subject to change. Portions of the third-party data is provided under license.

In addition, human intervention is applied throughout the reporting / data compilation process. As such, it is possible that errors could occur. Therefore, Circle Waste reserve the right to amend the data to improve its accuracy, in line with changes from third-party sources.

DaR Codes, Waste Hierarchy and Waste Fate Table

DaR codes (also referred to as RaD codes) are often used to categories the waste fate in Waste Returns. Circle 360 uses this data against each waste job to determine the tonnes and percentage of waste sent to specific fates, as well as the CO2 emissions produced from disposal.

DaR Code	Description	Waste Hierarchy Category	CO2e Factor Category
D01	Deposit into or onto land, e.g. landfill	Landfill	Landfill
D02	Land treatment, e.g. biodegradation of liquid or sludgy discards in soils	Landfill	Landfill
D03	Deep injection, e.g. injection of pumpable discards into wells, salt domes or naturally occurring repositories	Landfill	Landfill
D04	Surface impoundment, e.g. placement of liquid or sludgy discards into pits, ponds or lagoons	Landfill	Landfill
D05	Specially engineered landfill, e.g. placement into lined discrete cells which are capped and isolated from one another and the environment	Landfill	Landfill
D06	Release into a water body, except seas/oceans	Other Disposal	Open-Loop / Closed-Loop
D07	Release into seas/oceans, including sea-bed insertion	Other Disposal	Open-Loop / Closed-Loop
D08	Biological treatment resulting in final compounds or mixtures which are discarded by any of the operations numbered D1 to D12	Other Recovery	Open-Loop / Closed-Loop
D09	Physico-chemical treatment resulting in final compounds or mixtures which are discarded by any of the operations numbered D1 to D12, e.g. evaporation, drying, calcination	Other Recovery	Open-Loop / Closed-Loop
D10	Incineration on land	Incineration (No Energy Recovery)	Combustion
D11	Incineration at sea	Incineration (No Energy Recovery)	Combustion
D12	Permanent storage, e.g. emplacement of containers in a mine	Landfill	Landfill
D13	Blending or mixing prior to submission to any of the operations numbered D1 to D12	Other Recovery	Open-Loop / Closed-Loop
D14	Repackaging prior to submission to any of the operations numbered D1 to D13	Other Recovery	Open-Loop / Closed-Loop
D15	Storage pending any of the operations numbered D1 to D14	Other Recovery	Open-Loop / Closed-Loop
R01	Use principally as a fuel or other means to generate energy	Incineration (With Energy Recovery)	Combustion
R02	Solvent reclamation/regeneration	Other Recovery	Open-Loop / Closed-Loop
R03	Recycling/reclamation of organic substances which are not used as solvents	Recycle	Open-Loop / Closed-Loop
R03.01	Sorting organic wastes for recovery	Other Recovery	Open-Loop / Closed-Loop
R03.02	Composting	Composting / AD	Composting / AD
R03.03	Anaerobic digestion	Composting / AD	Composting / AD
R03.04	Mechanical Processing	Other Recovery	Open-Loop / Closed-Loop
R03.05	Mechanical-biological stabilisation	Other Recovery	Open-Loop / Closed-Loop
R03.06	Mechanical – physical stabilisation	Recycle	Open-Loop / Closed-Loop
R03.07	Recycling	Recycle	Open-Loop / Closed-Loop
R03.10	Repair / refurbishment / cleaning etc. for re-use	Reuse	Re-use
R04	Recycling/reclamation of metals and metal compounds	Other Recovery	Open-Loop / Closed-Loop
R04.01	Sorting metals	Other Recovery	Open-Loop / Closed-Loop
R04.02	Mechanical Processing	Other Recovery	Open-Loop / Closed-Loop

R04.03	Physico-chemical treatment	Other Recovery	Open-Loop / Closed-Loop
R04.04	Thermal treatment to regenerate metal waste	Other Recovery	Open-Loop / Closed-Loop
R04.05	Recycling metal in product manufacture	Recycle	Open-Loop / Closed-Loop
R04.06	Repair / refurbishment of metal / metal compounds	Reuse	Re-use
R05	Recycling/reclamation of other inorganic materials	Other Recovery	Open-Loop / Closed-Loop
R05.01	Bulking up glass	Other Recovery	Open-Loop / Closed-Loop
R05.02	Soil treatment	Other Recovery	Open-Loop / Closed-Loop
R05.03	Mechanical reprocessing of industrial wastes	Recycle	Open-Loop / Closed-Loop
R05.04	Chemical-physical treatment	Other Recovery	Open-Loop / Closed-Loop
R05.05	Thermal treatment of inorganic wastes	Other Recovery	Open-Loop / Closed-Loop
R05.06	Manufacture of new products from inorganic waste	Recycle	Open-Loop / Closed-Loop
R05.07	Use of inorganic waste	Reuse	Re-use
R05.08	Repair / refurbishment of other inorganic compounds	Reuse	Re-use
R06	Regeneration of acids or bases	Other Recovery	Open-Loop / Closed-Loop
R07	Recovery of components used for pollution abatement	Recycle	Open-Loop / Closed-Loop
R08	Recovery of components from catalysts	Recycle	Open-Loop / Closed-Loop
R09	Oil re-refining or other reuses of oil	Reuse	Re-use
R10	Land treatment resulting in benefit to agriculture or ecological improvement	Reuse	Re-use
R11	Use of wastes obtained from any of the operations numbered R1 to R10	Reuse	Re-use
R12	Exchange of wastes for submission to any of the operations numbered R1 to R11	Other Recovery	Open-Loop / Closed-Loop
R13	Storage of wastes pending any of the operations numbered R1 to R12	Other Recovery	Open-Loop / Closed-Loop

Note: In terms of CO2e Factors, Open-Loop and Closed-Loop recycling have the same conversion factors. Likewise, Composting and Anaerobic Digestion also have the same factors, so these are grouped together into two categories for reporting purposes.

Document Versions

Date	Description of change
05/02/2020	Initial Release
28/10/2021	Additions: <ul style="list-style-type: none">• Waste Fate Tonnes / Percentages and Diversion from Landfill (paragraph “Average Data for the Waste Facility”),• Carbon Emission Reporting – Haulage (paragraph “Emissions for jobs where the waste origin is unknown”)• Carbon Emission Reporting – Disposal (entire paragraph)• DaR Codes, Waste Hierarchy and Waste Fate Table (entire paragraph)
24/06/2022	DaR code R03.10 is used on Circle 360, but originally missing from the table in this document. Now added.