Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Biffa Waste Services Limited

Redcar Plastics Recycling Facility
Plastics Road
Wilton Industrial Estate
Redcar
Cleveland
TS10 4RG

Permit number

EPR/GP3947QE

Redcar Plastics Recycling Facility
Permit number EPR/GP3947QE

Introductory note

This introductory note does not form a part of the permit

The main features of the permit are as follows.

The site is located in an industrial area of Middlesbrough on the Wilton International Site approximately 1.5 miles southwest of Redcar at National Grid Reference NZ 57121 21391. Immediately to the north of the site is a separate permitted plastics recycling facility also operated by Biffa Waste Services Limited. The surrounding land use is entirely industrial.

There are a number of protected habitats sites of ecological importance close to the site:

- Teesmouth and Cleveland Coast Special Protection Area (SPA) approximately 2.5km from site.
- Teesmouth and Cleveland Coast Ramsar and PRamsar (proposed Ramsar) sites approximately 3 - 6 km from site.
- North York Moors (SPA) and Special Area of Conservation (SAC) approximately 8.5km from site.

The permitted facility accepts baled post-consumer HDPE (high density polyethylene) milk and juice bottles for treatment. Accepted waste is stored in bales in dedicated external bays with an impermeable surface. The HDPE milk and juice bottles will be sourced from Biffa's internal operations and third-party sites. The site processes up to 30,000 tonnes per annum in an Advanced Recycling Facility (ARF). The ARF process consists of the breaking of baled waste; removal of contaminants (such as non-natural or non-white articles or metals); dry granulation; prewash; wash reactor; flake drying; automatic density separator; label removal; flake sorting, flake decontamination and palletisation; bagging and testing of the final product.

The ARF process takes place within the main processing building on an impermeable surfacing. No processing or treatment operations is carried out on the bales outside the main processing building. The final product of the ARF facility will be clean, food grade HDPE which will be stored inside the building in bags, and which will be sold for use in operations such as HDPE milk bottle production. The plastics recycling facility produces a product output of approximately 17,000 tonnes per year.

The plastics recycling facility uses water as an integral part of the processing of the waste at a rate of approximately 1.75 - 2.0m^3 water per tonne of plastic waste recycled. Wastewater produced from the ARF wash plant process is sent to a dedicated drainage system. This shall route all process effluent into two sumps that will be directed to an on-site wastewater treatment unit. The wastewater is initially treated to remove large solids from the effluent, and then passed through a Dissolved Air Flotation (DAF) system. The screened solids from this process are further treated to remove liquids via a dewatering system.

The screened solids are stored externally in a skip on site and collected daily for removal off-site.

Pre-operational and improvement conditions within the permit will require the operator to upgrade their on-site wastewater treatment capabilities.

The plastics recycling facility is permitted as a waste operation.

The on-site wastewater treatment plant is permitted as an:

- S5.4 Part A (1) (ii) activity (disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving physico-chemical treatment).

The wastewater exiting the treatment plant, approximately 5-10m^3/hour, is discharged to the Sembcorp Utilities (UK) Limited drainage system at the Wilton International Site complex. The Biffa wastewater will be mixed with other effluents from other businesses on the Wilton site before the combined effluents are

discharged by Sembcorp under environmental permit, QR.25/04/1528, into Dabholm Gut, a narrow tidal inlet off the Tees Estuary.

Dabholm Gut is included within the Teesmouth and Cleveland Coast SPA, Site of Special Scientific Interest (SSSI) and Ramsar designated conservation sites.

The operator at the time of permit determination has not been able to confirm that:

- discharges from their permitted site will comply with the BAT-AELs for total suspended solids and chemical oxygen demand relating to direct discharges to receiving waters (Waste Treatment BREF, BAT-conclusions).
- discharges from their permitted site will not increase nutrient addition to the protected habitats site.
- discharges from their permitted site will either comply with the relevant environmental quality standards (EQSs) or cause no adverse impact on benthic communities within Dabholm Gut.

Pre-operational conditions (PO1 and PO2) have been included in the permit requiring the operator to confirm each of the above aspects before commencing any discharge of effluent to receiving waters (either via the Sembcorp discharge route or any other) and eventually to Dabholm Gut. Pre-operational conditions can be found in table S1.4 of the permit.

During this period, they can operate the plastics recycling facility provided they remove wastewater from site by tanker or other means that do not involve direct discharge to receiving waters.

The site will operate in accordance with a Fire Prevention Plan, as referenced in Table S1.2 of this permit.

The facility will be managed in accordance with an environmental management system (EMS) accredited to ISO14001.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	**Date**	**Comments**
Application EPR/GP3947QE/A001	Duly made 29/09/2022	Application for a plastics recycling facility and effluent treatment plant.
Additional information received Response to Schedule 5 Notice dated 21/10/2022	18/11/2022	- Operation of effluent treatment plant including key process parameters. - Monitoring of emissions. - Secondary containment. - Accident management plan. - Treatment of water-based liquid wastes. - H1 Assessment. - Site Plans. - Fire prevention plan. - Proposed additional waste to be accepted with EWC Code, 191212. - Site condition report.
Additional information received	16/12/2022	- Compliance with BAT-AELs. - Whether any downstream effluent treatment is carried out on Biffa wastewater. - Fire prevention plan (retention of fire water).
Additional information received	30/12/2022	- Information on permitting the discharge of wastewater from the facility to receiving waters as a ‘direct’ or ‘indirect’ discharge. - Applicability of BAT-AELs.

Status log of the permit		
Description	**Date**	**Comments**
Additional information received	13/02/2023	- Proposed scope and stages of water quality modelling. - Applicable emission limit values for environmental permit. - Site condition report.
Additional information received	15/02/2023	- operation to transfer effluent to road tanker for transport off-site.
Additional information received	01/03/2023	Updated Site Condition Report received.
Additional information received	07/03/2023	- Impact of proposed Biffa Redcar discharge on nutrient nitrogen in the Tees Estuary. - Use of CCTV in detecting fires in plastic bale storage area.
Additional information received	17/03/2023	- Site plan. - Organic substances recycled under waste operation, R3. - Effluent sampling.
Additional information received	23/03/2023	Redcar Effluent Discharge Modelling Report
Additional information received	24/03/2023	- Services provided to Biffa operation by chillers, compressors and transformers. - Material Safety Data Sheets for chemicals used on site.
Additional information received	27/03/2023	- Fire Prevention Plan, V3. - Updated Site Working Plan (incorporating removal of effluent from site by tanker). - Updated Risk Assessment.
Additional information received	29/03/2023	- Management of site surface water.
Additional information received	30/03/2023	- Effluent discharge flowrate.
Additional information received	21/04/2023	- Expected nitrogen and aluminium concentrations in effluent. - Use of coagulant solutions containing aluminium.
Additional information received	28/04/2023	- Expected effluent temperature at discharge.
Additional information received	21/07/2023	- Expected concentrations of nitrogen and chloride in effluent. - Mitigation options for reducing nitrogen in effluent. - Compliance with environmental quality standards.
Additional information received	13/09/2023	- Review of methods to reduce chloride in effluent. - Potential origin of chloride in effluent. - Chloride content of raw materials used in facility. - Expected chloride content in the different EWC codes of wastes permitted to be accepted to site.
Additional information received	04/10/2023	- Review of methods to achieve nutrient neutrality in waterbody into which Biffa will discharge effluent. - Review of compliance of pollutant concentrations in Biffa effluent against their respective environmental quality standards.
Additional information received	19/10/2023	- Review of sources of zinc in Biffa effluent.

Status log of the permit		
Description	**Date**	**Comments**
		- Review of treatment options to reduce pollutants in Biffa effluent. - Review of source of pollutants in Biffa effluent. - Updated review of compliance of pollutant concentrations in Biffa effluent against their respective environmental quality standards.
Additional information received	10/11/2023	Concentration of mercury in Biffa effluent.
Additional information received	06/12/2023	Review of Biffa consideration of: - Prevention of any increase in nutrients (nitrogen) being added to the Teesmouth and Cleveland Coast conservation site. - Compliance of Biffa effluent discharge against Environmental Quality Standards (EQS). - Impact on benthic communities within Dabholm Gut by addition of extra salinity in Biffa effluent (including discharge only at high tide).
Additional information received	31/01/2024	Concentration data of organic compounds and metals within Biffa effluent generated during commissioning trials.
Additional information received	20/02/2024	Confirmation of concentration units for phenolics (as phenol) in Biffa effluent.
Additional information received	06/03/2024, 07/03/2024, 25/03/2024, 26/03/2024	Concentrations of dissolved and total metals in Biffa effluent.
Additional information received	23/04/2024	Compliance with proposed permit emission limit values for aluminium and pH in effluent exiting the Biffa wastewater treatment plant.
Permit determined EPR/GP3947QE (Billing ref: GP3947QE, EAWML408647).	23/07/2024	Permit issued to Biffa Waste Services Limited.

End of introductory note

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/GP3947QE

The Environment Agency hereby authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016

Biffa Waste Services Limited ("the operator"),

whose registered office is

Coronation Road
Cressex
High Wycombe
Bucks
HP12 3TZ

company registration number 00946107

to operate an installation and waste operations at

Redcar Plastics Recycling Facility
Plastics Road
Wilton Industrial Estate
Redcar
Cleveland
TS10 4RG

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Marcus Woodward	**23/07/2024**

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

1.1.1 The operator shall manage and operate the activities:

(a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and

(b) using sufficient competent persons and resources.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.1.4 The operator shall comply with the requirements of an approved competence scheme.

1.2 Energy efficiency

1.2.1 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR3), the operator shall:

(a) take appropriate measures to ensure that energy is used efficiently in the activities;

(b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and

(c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

1.3.1 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR3), the operator shall:

(a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;

(b) maintain records of raw materials and water used in the activities;

(c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and

(d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

1.4.1 The operator shall take appropriate measures to ensure that:

(a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and

(b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and

(c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities").

2.1.2 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR3), waste authorised by this permit shall be clearly distinguished from any other waste on the site.

2.2 The site

2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

2.3 Operating techniques

2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.

2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation ("plan") specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan , and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.

2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.

2.3.4 Waste shall only be accepted if:

(a) it is of a type and quantity listed in schedule 2 table S2.2

(b) it conforms to the description in the documentation supplied by the producer and holder.

2.3.5 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:

(a) the nature of the process producing the waste;

(b) the composition of the waste;

(c) the handling requirements of the waste;

(d) the hazardous property associated with the waste, if applicable; and

(e) the waste code of the waste.

2.3.6 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.4 Improvement programme

2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.

2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

2.5 Pre-operational conditions

2.5.1 The operations specified in schedule 1 table S1.4 shall not commence until the measures specified in that table have been completed.

3 Emissions and monitoring

3.1 Emissions to water, air or land

3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 table S3.1.

3.1.2 The limits given in schedule 3 shall not be exceeded.

3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

3.2 Emissions of substances not controlled by emission limits

3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

3.2.2 The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;

(b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Odour

3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

3.3.2 The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;

(b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.4 Noise and vibration

3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.

3.4.2 The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;

(b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Monitoring

3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:

(a) point source emissions specified in table S3.1.

3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.

3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 table S3.1 unless otherwise agreed in writing by the Environment Agency.

3.6 Pests

3.6.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.

3.6.2 The operator shall:

(a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution from pests;

(b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.7 Fire prevention

3.7.1 The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them including, but not limited to, those specified in any approved fire prevention plan.

4 Information

4.1 Records

4.1.1 All records required to be made by this permit shall:

(a) be legible;

(b) be made as soon as reasonably practicable;

(c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and

(d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:

(i) off-site environmental effects; and

(ii) matters which affect the condition of the land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.

4.2.2 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR3), a report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:

(a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;

(b) the annual production/treatment data set out in schedule 4 table S4.2; and

(c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.

4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

(a) in respect of the parameters and emission points specified in schedule 4 table S4.1;

(b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and

(c) giving the information from such results and assessments as may be required by the forms specified in those tables.

4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

4.3 Notifications

4.3.1 In the event:

(a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—

(i) inform the Environment Agency,

(ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and

(iii) take the measures necessary to prevent further possible incidents or accidents;

(b) of a breach of any permit condition the operator must immediately—

(i) inform the Environment Agency, and

(ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;

(c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

(a) any change in the operator's trading name, registered name or registered office address; and

(b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

(a) any change in the operator's name or address; and

(b) any steps taken with a view to the dissolution of the operator.

In any other case:

(a) the death of any of the named operators (where the operator consists of more than one named individual);

(b) any change in the operator's name(s) or address(es); and

(c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

(a) the Environment Agency shall be notified at least 14 days before making the change; and

(b) the notification shall contain a description of the proposed change in operation.

4.3.6 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.

4.4 Interpretation

4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	**Activity listed in Schedule 1 of the EP Regulations**	**Description of specified activity and WFD Annex I and II operations**	**Limits of specified activity and waste types**
AR1	S5.4 A1 (a) (ii) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving physico-chemical treatment, and excluding activities covered by Council Directive 91/271/EEC concerning urban waste-water treatment.	Effluent treatment: D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12.	From receipt of effluent produced by activity AR4 into effluent treatment plant, to the discharge to a private sewer. The operation of the effluent treatment plant will be fully defined following completion of PO1, PO2 and PO3 and will operate as defined in PO3.
	Directly Associated Activity		
AR2	Raw material storage	Storage of raw materials	From the receipt of raw materials to despatch for use within the facility.
AR3	Surface water collection and disposal	The collection, handling and disposal of uncontaminated surface water runoff from roofs and surfaces.	From the generation of surface water from roof, waste storage area and all external site surfacing to its collection in drains and an attenuation tank to its combination with effluent treatment plant waste water and main processing building foul waste prior to discharge off-site at point W1.

Activity reference	**Description of activities for waste operations**	**Limits of activities**
AR4	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced). R3: Recycling/reclamation of organic substances which are not used as solvents. R5: Recycling/reclamation of other inorganic compounds	Physical treatment including manual and mechanical sorting, separation, screening, shredding, washing, pelletisation, heat treatment and bagging of non-hazardous waste for recovery. Recycling/reclamation of organic substances restricted to HDPE plastic bottles received on site. All waste will be stored on an impermeable surface with a sealed drainage system. Subject to any other requirements of this permit wastes shall be stored for no longer than 3 years prior to recovery. No more than 300 tonnes of waste will be stored on site at any one time. Waste types as specified in Table S2.2.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application, EPR/GP3947QE/A001	Risk Assessment and Site Condition Report provided in response to section 3a – technical standards, Part B3 of the application form. Technical standards in relation to Best available techniques as described in BAT conclusions under Directive 2010/75/EU of the European Parliament and of the Council on waste treatment. BAT Assessment Document (Appendix 3): - Compliance against BAT 5 & BAT 19 of Waste Treatment BREF BAT-Conclusions on inspection of pipework & components of wastewater treatment plant.	Duly Made 29/09/2022
Response to Schedule 5 Notice dated 21/10/2022	Operating techniques described in the responses to the Notice (including accompanying information): - Response to question 4 on management of site infrastructure to deliver the necessary level of secondary containment around tanks, vessels and process plant containing liquids.	18/11/2022
Additional information	Operating techniques on the sampling of effluent discharge.	17/03/2023
Additional information	Fire prevention plan (FPP) provided in response to section 5d, Supporting Information, Part B2 of the application form: - Updated FPP (V3, March 2023)	27/03/2023
Additional information	Operating techniques on handling and storage of effluent on site, loading effluent onto road tankers and transporting effluent off-site for disposal included in Section 2.7.7 of Biffa Polymers Redcar, Environmental Working Plan (17/03/2023).	27/03/2023

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	**Ongoing improvement in emissions.** The operator shall submit a written report to the Environment Agency for written approval. The report shall: - Outline how the operator shall implement the ongoing reduction of emissions of pollutants in their effluent discharged to Dabholm Gut. - Include an assessment of the origin of these pollutants within the operator's effluent discharge. - Propose methods for the further reduction of pollutants such as trace metals, organic compounds, nitrogen and chloride (salinity). - Propose methods on how these pollutants can be reduced prior to the arrival of plastic waste to the operator's site and/or reduced within the wash water exiting the operator's plastics recycling plant. - Where appropriate, a cost benefit analysis must be included in the report to justify any further pollutant reduction methods proposed or ruled out of consideration. - Outline timescales for any further pollutant reduction measures proposed.	Within 9 months of completion of PO1, PO2 or PO3 (whichever is the last date) or such other date as agreed in writing with the Environment Agency.

	The operator shall implement any agreed pollutant reduction measures within the timescales approved by the Environment Agency.	
IC2	**Monitoring – frequency and extent.** The operator shall submit a written proposal to the Environment Agency for technical assessment and written approval that includes the scope and timescales for a sampling and monitoring trial on the treated effluent discharged via point W2 for the pollutants listed in Table S3.1. The proposal shall include: - Confirmed commencement date and duration of the trial period. - The frequency and number of samples to be taken during the trial. - The analytical methods to be used to test for the parameters outlined in Table S3.1 and their limits of detection. - The criteria to be used to determine if emission levels are proven to be 'sufficiently stable' as outlined in Waste Treatment BAT-conclusions, BAT7, such that monitoring frequencies in Table S3.1 can be reduced. - The criteria to be used to determine those parameters whose concentrations in the discharge leaving the permitted boundary are deemed not 'relevant' in regard to a waste inventory required by BAT3 of the Waste Treatment BREF BAT-conclusions which indicate in BAT20 (Table 6-1) that routine monitoring of these parameters in effluent discharge is not required. - The criteria with timescales, if appropriate to reduce the number of species monitored or to reduce the monitoring frequency for substances monitored. - The date of submission of the final trial report to the Environment Agency for technical assessment and written approval. The operator shall implement the sampling and monitoring trial and submit the final trial report to the Environment Agency for technical assessment and written approval within the timescales approved by the Environment Agency.	Within 9 months of completion of PO1, PO2 or PO3 (whichever is the last date) or such other date as agreed in writing with the Environment Agency.
IC3	**Containment for effluent treatment plant.** The operator shall submit a written report to the Environment Agency for technical assessment and written approval. The report shall: - Review site containment systems against the requirements of CIRIA C736 (Containment systems for the prevention of pollution. Secondary, tertiary and other measures for industrial and commercial premises). - Identify where containment systems can be optimised at the wastewater treatment plant and outline recommendations that will ensure containment measures for the contents of all storage tanks and reaction vessels meet the requirements of CIRIA C736. - Provide an assessment of the option of creating a bund around all or some of the wastewater treatment plant. - Confirm timescales for implementation of all recommendations proposed. The operator shall implement any agreed recommendations within the timescales approved by the Environment Agency.	Within 9 months of completion of PO1, PO2 or PO3 (whichever is the last date) or such other date as agreed in writing with the Environment Agency.

Table S1.4 Pre-operational measures for future development		
Reference	**Operation**	**Pre-operational measures**
PO1	Discharge of effluent to receiving waters (Dabholm Gut, Tees Estuary) via Sembcorp Utilities (UK) Limited Wilton International drainage system.	**Compliance with BAT-AELs.** The operator shall submit a written report to the Environment Agency for technical assessment and written approval. The report shall: - Demonstrate that the discharge of effluent from the operator's on-site effluent treatment plant to the Sembcorp Utilities (UK) Limited Wilton International drainage is in full compliance with the BAT-AELs for; suspended solids and chemical oxygen demand (COD) for direct discharges to receiving waters as listed in BAT 20, Table 6.1 of the Waste Treatment BREF BAT-conclusions. The direct discharge of treated effluent to these receiving waters via the Sembcorp drainage shall not commence until written approval has been received from the Environment Agency under this pre-operational condition.
PO2	Discharge of effluent to receiving waters (Dabholm Gut, Tees Estuary) via Sembcorp Utilities (UK) Limited Wilton International drainage system.	**Demonstration of nutrient neutrality.** The operator shall submit a written report to the Environment Agency for technical assessment and written approval. The report shall: - Demonstrate how the operator will ensure that the discharge of treated effluent from the permitted process will either: o Result in zero net nutrient nitrogen by a reduction in additions to the Teesmouth and Cleveland Coast protected habitats site. or o Result in zero net nutrient nitrogen by offsetting nutrient nitrogen additions to the Teesmouth and Cleveland Coast from other contributing sources. - Outline contingency measure in the event nitrogen reduction or offsetting schemes become unavailable. - Confirm the zero net nutrient nitrogen measures have been implemented. The direct discharge of treated effluent to these receiving waters via the Sembcorp drainage shall not commence until a zero net addition to Teesmouth and Cleveland Coast has been demonstrated and written approval has been received from the Environment Agency under this pre-operational condition.
PO3	Discharge of effluent to receiving waters (Dabholm Gut, Tees Estuary) via Sembcorp Utilities (UK) Limited Wilton International drainage system.	**Prevention of adverse impact on receiving waters due to toxic contamination.** The operator shall submit a written report to and obtain the Environment Agency's written approval to it. The report shall include but not be limited to: - Confirmation of the concentrations of pollutants likely to be present in the effluent from the wastewater treatment

Table S1.4 Pre-operational measures for future development		
Reference	**Operation**	**Pre-operational measures**
		plant and their effective concentrations at point of discharge into Dabholm Gut (the pollutants assessed must, as a minimum, include phenol and all metals listed in Table 6.1 of the Best Available Techniques (BAT) Conclusions for Waste Treatment, under Directive 2010/75/EU of the European Parliament and of the Council). - Comparison of the concentrations of these pollutants with their relevant environmental quality standards (EQS). - Assessment of the impact of the discharge of these pollutants at their concentrations within the Biffa effluent on the quality of the receiving environment. The report shall also include: - Justifications of the sources of aqueous discharges to Dabholm Gut and any natural flows (including tidal flows) used to assess compliance with EQS values. - All flows and pollutant concentrations relating to the Biffa effluent discharge to Dabholm Gut used in the report (from a minimum of 12 samples taken over a minimum of three months with at least one week between each sampling event). - The justification for the specific pollutants whose impacts have been assessed in the report. - The throughput and loading of the plastics recycling facility at the time pollutant concentrations were measured. - The justification for why it is considered that the discharges whose pollutant concentrations were assessed represent the expected plant operational throughput or a demonstration how their concentrations have been rationalised to reflect the expected operational plant throughput. - Proposals for emission limit values in Table S3.1 for Cu, Cr, Ni, Zn and Pb. - Proposal for any required upgrades to the effluent treatment plant.

Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	**Specification**
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Table S2.2 Permitted waste types and quantities for activity AR3.	
Maximum quantity	**The total quantity of waste accepted at the site for the above activity shall be no greater than 30,000 tonnes per year.**
Waste code	**Description**
02	**Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing**
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 04	waste plastics (except packaging)
07	**Wastes from organic chemical processes**
07 02	**wastes from the MFSU of plastics, synthetic rubber and man-made fibres**
07 02 13	waste plastic
12	**Wastes from shaping and physical and mechanical surface treatment of metals and plastics**
12 01	**wastes from shaping and physical and mechanical surface treatment of metals and plastics**
12 01 05	plastics shavings and turnings
15	**Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified**
15 01	**packaging (including separately collected municipal packaging waste)**
15 01 02	plastic packaging
17	**Construction and demolition wastes (including excavated soil from contaminated sites)**
17 02	**wood, glass and plastic**
17 02 03	plastic
19	**Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use**
19 12	**wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**
19 12 04	plastic and rubber
20	**Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions**
20 01	**separately collected fractions (except 15 01)**
20 01 39	plastics

Schedule 3 – Emissions and monitoring

Table S3.1 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements						
Emission point ref. & location	**Source**	**Parameter**	**Limit (incl. Unit)**	**Reference period**	**Monitoring frequency**	**Monitoring standard or method**
W1 on site plan in Schedule 7 - emission to Sembcorp Utilities (UK) Limited Wilton drainage system.	Site effluent treatment plant, surface water and process building foul waste.	--	--	--	--	--
W2 on site plan in Schedule 7 - emission from effluent treatment plant. (Note 4)	Site effluent treatment plant.	Maximum daily discharge volume	250 m^3/day	24-hour total	Continuous	MCERTS self-monitoring of effluent flow scheme
		Maximum rate of discharge	2.9 l/s	Instantaneous	--	--
		pH	6 - 9	Instantaneous, spot sample	Daily	MCERTS calibrated pH meter
		Total nitrogen (as N)	--	Instantaneous, spot sample	Daily	EN 12260, EN ISO 11905-1.
		Benzene, toluene, ethylbenzene, xylene (BTEX)	--	Instantaneous, spot sample	Monthly (Note 3)	EN ISO 15680
		PFOA (perfluorooctanoic acid)	--	Instantaneous spot sample	Every six months (Note 3)	BS ISO 25101
		PFOS (perfluorooctanesulphonic acid)	--	Instantaneous spot sample	Every six months (Note 3)	BS ISO 25101
		Total organic carbon (TOC) (Note 1)	100 mg/l	Instantaneous, spot sample.	Daily (Note 2)	EN 1484
		Total suspended solids (TSS)	60 mg/l	Instantaneous, spot sample.	Daily (Note 2)	BS EN 872
		Hydrocarbon oil index	10 mg/l	Instantaneous, spot sample.	Daily (Note 2)	EN ISO 9377-2

Table S3.1 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements						
Emission point ref. & location	**Source**	**Parameter**	**Limit (incl. Unit)**	**Reference period**	**Monitoring frequency**	**Monitoring standard or method**
		Total phosphorus (expressed as P)	3 mg/l	Instantaneous, spot sample.	Daily (Note 2)	Various standards are available such as: EN ISO 15681-1&-2; EN ISO 6878; EN ISO 11885
		Phenol index	0.3 mg/l	Instantaneous, spot sample.	Daily (Note 2)	EN ISO 14402
		Free cyanide	0.1 mg/l	Instantaneous, spot sample.	Daily (Notes 2, 3)	Various standards are available such as: EN ISO 14403-1 & -2
		Adsorbable organically bound halogens (AOX)	1 mg/l	Instantaneous, spot sample.	Daily (Notes 2, 3)	EN ISO 9562
		Arsenic (expressed as As)	0.1 mg/l	Instantaneous, spot sample.	Daily (Notes 2, 3)	Various standards are available such as: EN ISO 11885; EN ISO 17294-2; EN ISO 15586.
		Cadmium (expressed as Cd)	0.1 mg/l			
		Chromium (expressed as Cr)	0.3 mg/l			
		Copper (expressed as Cu)	- Note 5			
		Lead (expressed as Pb)	- Note 5			
		Nickel (expressed as Ni)	- Note 5			
		Zinc (expressed as Zn)	- Note 5			

Table S3.1 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements						
Emission point ref. & location	**Source**	**Parameter**	**Limit (incl. Unit)**	**Reference period**	**Monitoring frequency**	**Monitoring standard or method**
		Aluminium (expressed as Al)	1 mg/l			
		Hexavalent chromium (expressed as (Cr (VI))	0.1 mg/l	Instantaneous, spot sample.	Daily (Notes 2, 3)	Various standards are available such as: EN ISO 10304-3; EN ISO 23913.
		Mercury (expressed as Hg)	10 µg/l	Instantaneous, spot sample.	Daily (Notes 2, 3)	Various standards are available such as: BS EN ISO 17852; EN ISO 12846.
Note 1: Chemical Oxygen Demand (COD) with a limit of 300 mg/l may be used in place of TOC.						
Note 2: Monitoring frequency may be reduced if emission levels are proven to be sufficiently stable following completion of Improvement Condition, IC2.						
Note 3: Monitoring may not be required if these parameters are not identified as relevant in a wastewater inventory required in BAT3 of the Waste Treatment BREF BAT-conclusions following completion of Improvement Condition, IC2.						
Note 4: Discharge of wastewater through release point W2 shall not commence until the actions required by Pre-Operation Conditions 1, 2 and 3 have been carried out and agreed in writing by the Environment Agency.						
Note 5: Emission limit values shall be set following submission of response to PO3.						

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data			
Parameter	**Emission or monitoring point/reference**	**Reporting period**	**Period begins**
Point source emissions to water (other than sewer) Parameters as required by condition 3.5.1	W2	Every 6 months	1 January, 1 July

Table S4.2: Annual production/treatment	
Parameter	**Units**
Waste plastic received on site for recycling	tonnes
Recycled plastic exported from site	tonnes

Table S4.3 Performance parameters		
Parameter	**Frequency of assessment**	**Units**
Water usage	Annually	m^3
Energy usage	Annually	MWh

Table S4.4 Reporting forms		
Parameter	**Reporting form**	**Form version number and date**
Point source emissions to water (other than sewer)	Emissions to Water Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Water usage	Water Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Energy usage	Energy Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021

Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	**Notification period**

(c) Notification requirements for the breach of permit conditions not related to limits	
To be notified within 24 hours of detection	
Condition breached	
Date, time and duration of breach	
Details of the permit breach i.e. what happened including impacts observed.	
Measures taken, or intended to be taken, to restore permit compliance.	

(d) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	

Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“disposal” means any of the operations provided for in Annex I to the Waste Framework Directive.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“Hazardous property” has the meaning in Annex lll of the Waste Framework Directive.

“Hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“List of Wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“Pests” means Birds, Vermin and Insects.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

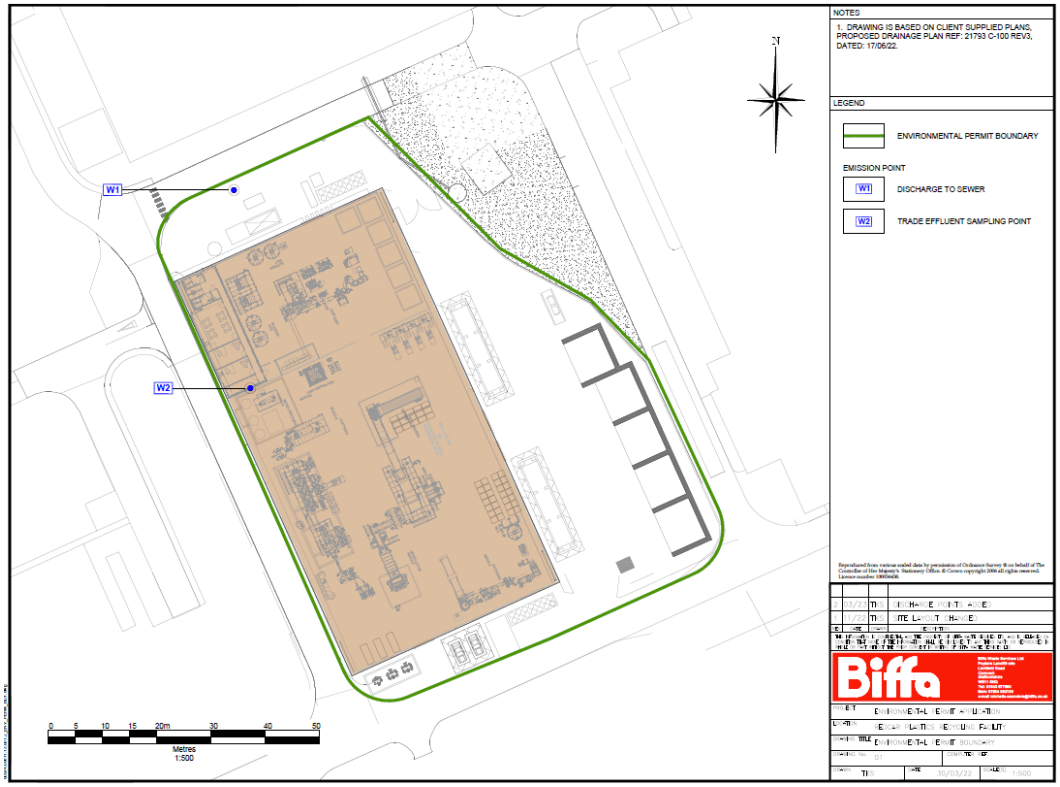
“recovery” means any of the operations provided for in Annex II to the Waste Framework Directive.

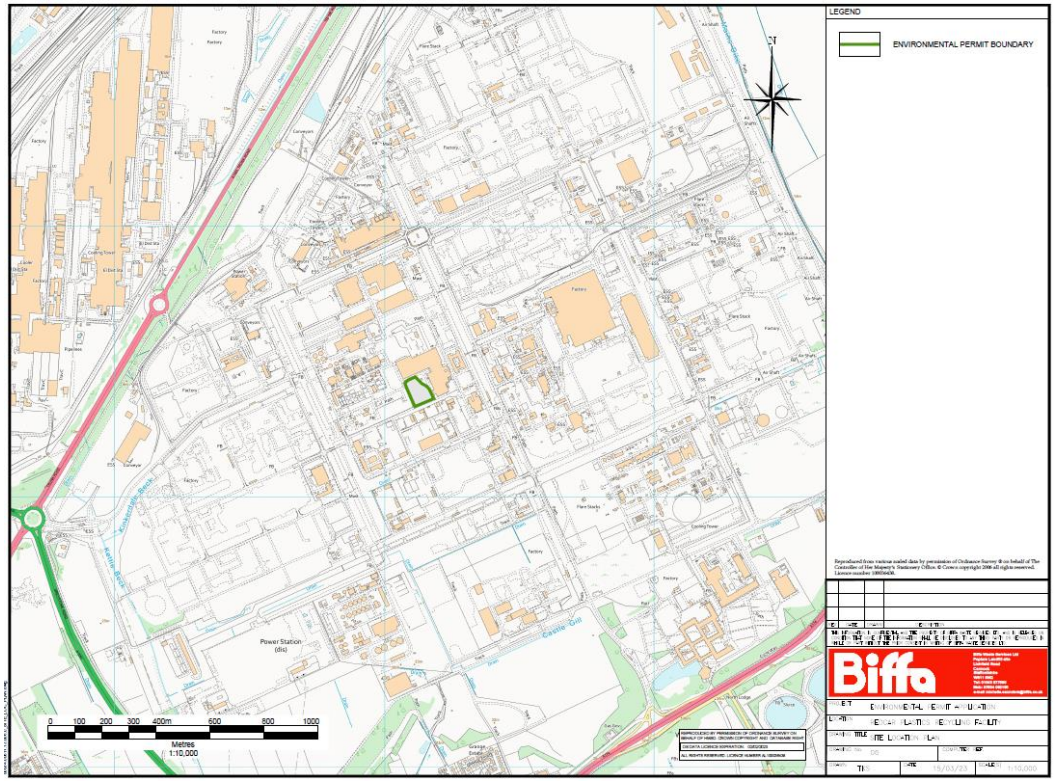
“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

Schedule 7 – Site plan





END OF PERMIT

Emissions to Water Reporting Form

Permit number: *[EPR/AB1234CB]*

Operator: *[A Company Name Limited]*

Facility name: *[Unit A, Anytown]*

Emissions to Water Reporting Form: version 1, 08/03/2021

Reporting of emissions to water (other than to sewer) for the period from *[DD/MM/YY]* to *[DD/MM/YY]*

Emission point	Substance / parameter	Emission Limit Value	Reference period	Test method [1]	Result [2]	Sample dates and times [3]	Uncertainty [4]
[e.g. W1]	*[e.g. Total suspended solids]*	*[e.g. 30 mg/l]*	*[e.g. For 95% of all measured values of periodic samples taken over one month]*	*[e.g. BS EN 872:2005]*	*[State result]*	*[State relevant dates and time periods]*	*[State uncertainty if not 95% confidence interval]*

Signed: *[Name]* **Date:** *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

Guidance for use: Use this form to report your monitoring results.
Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Complete columns 1 to 5 using the information from schedule 3 of your permit. Complete columns 6 to 8 with your monitoring data. Add additional rows as necessary.

[1] Where an internationally recognised standard test method is used, give the reference number. Where another method that has been formally agreed with the Environment Agency, give the appropriate identifier. In other cases state the principal technique, for example gas chromatography.

[2] Give the result as the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, give the result as the 'minimum to maximum' of the measured values.

[3] For non-continuous measurements give the date and time of the sample that produced the result. For continuous measurements give the percentage of the process operating time covered by the result.

i. Complete if the uncertainty associated with the result is not a 95% confidence interval. Leave blank for 95% confidence intervals.

Water Usage Reporting Form

Permit number: *[EPR/AB1234CB]*

Operator: *[A Company Name Limited]*

Facility name: *[Unit A, Anytown]*

Water Usage Reporting Form: version 1, 08/03/2021

Reporting of water usage for the year *[YYYY]*

Water source	Water usage (m^3)	Specific water usage (m^3/unit) [2]
Mains water	*[insert annual usage in m^3 where mains water is used]*	*[insert annual usage in m^3/unit where mains water is used]*
Site borehole	*[insert annual usage in m^3 where water is used from a site borehole]*	*[insert annual usage in m^3/unit where water is used from a site borehole]*
River abstraction	*[insert annual usage in m^3 where abstracted river water is used]*	*[insert annual usage in m^3/unit where abstracted river water is used]*
Other – *[specify other water source where applicablel. Add extra rows where needed]*	*[insert annual usage in m^3 where applicable]*	*[insert annual usage in m^3/unit where applicable]*
Total water usage	*[insert total annual water usage in m^3]*	*[insert total annual water usage in m^3/unit]*

Operator's comments

Signed: *[Name]* **Date:** *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

Guidance for use: Use this form to report your annual water usage.
Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Add additional rows as necessary.

Energy Usage Reporting Form

Permit number: *[EPR/AB1234CB]*

Operator: *[A Company Name Limited]*

Facility name: *[Unit A, Anytown]*

Energy Usage Reporting Form: version 1, 08/03/2021

Reporting of energy usage for the year *[YYYY]*

Energy source	Energy consumption / production (MWh)	Specific energy consumption (MWh/unit) [2]
Electricity imported as delivered - source [specify source, e.g. supplied from the national grid]	*[insert annual consumption in MWh where electricity is imported]*	*[insert annual consumption in MWh/unit where electricity is imported]*
Electricity imported as primary energy 1 – conversion factor of [specify conversion factor used to convert electricity delivered to primary energy]	*[insert annual consumption in MWh where electricity is imported]*	*[insert annual consumption in MWh/unit where electricity is imported]*
Natural gas	*[insert annual consumption in MWh where natural gas is used]*	*[insert annual consumption in MWh/unit where natural gas is used]*
Gas oil – conversion factor of [specify conversion factor used to convert tonnes to MWh]	*[insert annual consumption in MWh where gas oil is used]*	*[insert annual consumption in MWh/unit where gas oil is used]*
Imported heat	*[insert annual consumption in MWh where heat is imported]*	*[insert annual consumption in MWh/unit where heat is imported]*
Other – *[specify other energy source and conversion factors where applicable, e.g. renewable fuel. Add extra rows where needed]*	*[insert annual consumption in MWh where applicable]*	*[insert annual consumption in MWh/unit where applicable]*
Electricity exported	*[insert annual production in MWh where electricity is exported]*	Not applicable
Heat exported	*[insert annual production in MWh where heat is exported]*	Not applicable

Operator's comments

Signed: *[Name]* **Date:** *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

Guidance for use: Use this form to report your annual energy usage.
Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Add additional rows as necessary.

[1] Multiply delivered electricity by 2.4 to convert to primary energy where the electricity is supplied from the national grid. If the electricity is supplied from another source, specify the conversion factor used. Add additional rows as needed if electricity is imported from multiple sources.

[2] Divide energy consumption by an appropriate unit of raw material processed or product output.