

Permitting Decisions- Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for European Metal Recycling operated by European Metal Recycling Limited following a review of the permit in accordance with Environmental Permitting (England and Wales) Regulations 2016, regulation 34(1).

The variation number is EPR/FB3509MJ/V004

Permit Review

This Environment Agency has a duty, under the Environmental Permitting (England and Wales) Regulations 2016 (EPR), regulation 34(1), to periodically review permits. Article 21(3) of the Industrial Emissions Directive (IED) also requires the Environment Agency to review conditions in permits to ensure that they deliver compliance with relevant standards, within four years of the publication of updated decisions on Best Available Techniques (BAT) Conclusions.

We have reviewed the permit for this regulated facility and varied the permit to make a number of changes to reflect relevant standards and best practice. These changes principally relate to the implementation of our technical guidance for WEEE treatment and transfer and End of life vehicles (ELVs) , including the relevant requirements of the BAT Conclusions for Waste Treatment which have been incorporated into our guidance.

In this decision document, we set out the reasoning for the variation notice that we have issued.

It explains how we have reviewed and considered the techniques used by the operator in the operation and control of the plant and activities of the installation (operating techniques) against our technical guidance.

As well as considering the review of the operating techniques used by the Operator for the operation of the plant and activities of the installation, the consolidated variation notice takes into account and brings together in a single document all previous variations that relate to the original permit issue. Where this has not already been done, it also modernises the entire permit to reflect the conditions contained in our current generic permit template.

Purpose of this document

This decision document provides a record of the decision making process. It:

- explains how the Environment Agency initiated variation has been determined;
- summarises the decision making process in the [decision considerations](#) section to show how the main relevant factors have been taken into account;
- highlights [key issues](#) in the determination.

Read the permitting decisions in conjunction with the environmental permit and the variation notice.

Key issues of the decision

Metal shredding

The operator confirmed that the metal shredder is non-operational but wished to retain the S5.4 A(1) (b) (iv) activity on the permit. As there is no functioning metal shredder on site the operator could not complete the Regulation 61 notice for treating metal waste in shredders. The site will need to confirm with the Environment Agency that they are compliant with the Treating metal waste in shredders: appropriate measures for permitted facilities published 20 October 2021, prior to recommencing this activity. This activity has been mothballed, and commencement cannot take place until pre-operational condition PO1 has been completed and approved by the Environment Agency.

Compliance with BAT Conclusions and Appropriate Measures may require the operator to vary the permit. In this event, a variation may need to be submitted and determined prior to us confirming completion of the pre-operational condition and allowing the activities to recommence.

Treatment of hazardous and non-hazardous catalytic converters

The operator confirmed that no treatment of catalytic converters takes place on site but wish to retain the ability to do so in the permit. The operator has confirmed a suitable treatment facility would need to be constructed with an emission point. The site will need to confirm with the Environment Agency that they are compliant with the Environment Agency's quick guide 'Catalytic Converters containing Refractory Ceramic Fibre', prior to recommencing these activities. Waste operations AR8 and AR9 have been mothballed, and commencement of treatment of hazardous and non-hazardous catalytic converters cannot occur until pre-operational condition PO2 and PO3 have been completed respectively and approved by the Environment Agency.

Compliance with BAT Conclusions and Appropriate Measures may require the operator to vary the permit. In this event, a variation may need to be submitted and determined prior to us confirming completion of the pre-operational condition and allowing the activities to recommence.

Environment Agency led variation – permit review

We have carried out an Environment Agency initiated variation to the permit following a permit review as required by legislation to ensure that permit conditions deliver compliance with relevant legislative requirements and appropriate standards to protect the environment and human health.

The Industrial Emissions Directive (IED) came into force on 7 January 2014 with the requirement to implement all relevant Best Available Techniques (BAT) Conclusions as described in the Commission Implementing Decision. Article 21(3) of the IED requires the Environment Agency to review conditions in permits that it has issued and to ensure that the permit delivers compliance with relevant standards, within four years of the publication of updated decisions on Best Available Techniques (BAT) Conclusions.

The BAT Conclusions for Waste Treatment (the BREF) was published on 17 August 2018 following a European Union wide review of BAT, implementing decision (EU) 2018/1147 of 10 August 2018. Relevant existing facilities were expected to be in compliance with the BAT Conclusions within 4 years (i.e. by August 2022).

On 13th July 2022 our WEEE (waste electrical and electronic equipment) appropriate measures guidance was published on gov.uk. This guidance includes additional appropriate measures for WTEE (waste temperature exchange equipment).

This technical guidance explains the standards (appropriate measures) that are relevant to regulated facilities with an environmental permit to treat or transfer WEEE (including WTEE) and incorporates the relevant requirements of the BAT Conclusions.

The following Appropriate Measures guidance is also applicable to the permitted activities being varied under this permit review and has been included in the operating techniques table.

End-of-Life Vehicles (ELVs): appropriate measures for permitted facilities

We issued a notice under regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 (a Regulation 61 Notice) on 17/12/2021 requiring the operator to provide information to confirm that the operation of their facility currently meets, or how it will subsequently meet, the standards (appropriate measures) described in our technical guidance for treating waste in metal shredders.

We issued a notice under regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 (a Regulation 61 Notice) on 20/04/2022 requiring the operator to provide information to confirm that the operation of their facility currently meets, or how it will subsequently meet, the standards (appropriate measures) described in our technical guidance for treatment of WEEE.

The notices required that where the revised standards are not currently met, the operator should provide information that:

- Describes the techniques that will be implemented to ensure operations meet the relevant standards and by when, or
- Explains why they are not applicable to the facility in question, or
- Justifies why an alternative technique is appropriate and will achieve an equivalent level of environmental protection to the standards described in our guidance

The standards described in our technical guidance are split into 7 chapters:

- General management appropriate measures
- Waste pre-acceptance, acceptance and tracking appropriate measures
- Waste storage, segregation and handling appropriate measures
- Waste treatment appropriate measures
- Emissions control appropriate measures
- Emissions monitoring and limits appropriate measures
- Process efficiency appropriate measures

We have set emission limit values (ELVs) and monitoring requirements for relevant substances in line with our technical guidance and the BAT Conclusions for Waste Treatment, unless a tighter, i.e. more stringent, limit was previously imposed and these limits have been carried forward.

The Regulation 61 notice required the operator to confirm whether they could comply the standards described in each of these chapters. Table 1 below provides a summary of the response received and our assessment of it. The overall status of compliance with the standards (appropriate measures) is indicated in the table as:

NA – Not Applicable

CC – Currently Compliant

FC – Compliant in the future (through improvement conditions set in permit)

NC – Not Compliant

In accordance with Article 22(2) of the Industrial Emissions Directive, the Regulation 61 notice asked the operator to provide a soil and groundwater risk assessment, along with a baseline report or summary report confirming the

current state of soil and groundwater contamination, where listed activities are undertaken that involve the use, production or release of relevant hazardous substances.

The Regulation 61 notice also asked the operator to confirm whether they operate a medium combustion plant or specified generator (as per Schedule 25A or 25B of EPR 2016) and whether they had considered how their operations could be affected by climate changes (e.g. through a climate change adaptation plan).

Our assessment of the responses received from the operator regarding soil and groundwater risk assessment, medium combustion plant and specified generators, and consideration of climate change are also summarised in Table 1.

The Regulation 61 notice response from the Operator was received on 29/08/2022 for activities relating to treatment of WEEE. No response was received from the operator in relation to treatment of metal waste in shredders. The operator confirmed the shredder is not operational.

We considered that the response did contain sufficient information for us to commence determination of the permit review.

Although we were able to consider the Regulation 61 notice response generally satisfactory at receipt, we needed more information in order to complete our permit review assessment. We requested this by email and the operator provided further information on 21/08/2025. We made a copy of this information available on our public register.

The operator provided the following information:

- Compliance with End-of-Life Vehicles (ELVs): appropriate measures for permitted facilities;
- Granulation is not carried out on site;
- Treatment of hazardous and non-hazardous catalytic converters is not currently carried out on site;
- There is no MCP on site;
- Drainage plan submitted; and
- Confirmation that non-relevant EWC codes can be removed.

Table 1 – Summary of our assessment of the operator’s Reg 61 response

Appropriate measures	Compliance status	Assessment of the installation's compliance with relevant standards (appropriate measures) and any alternative techniques proposed by the operator
General management appropriate measures	CC	<u>WEEE appropriate measures:</u> The operator confirmed that they currently meet the requirements of all appropriate measures in this section. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2. <u>ELV appropriate measures:</u> The operator confirmed that they currently meet the requirements of all appropriate measures in this section. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.
Waste pre-acceptance, acceptance and tracking appropriate measures	CC	<u>WEEE appropriate measures:</u> The operator confirmed that they currently meet the requirements of all appropriate measures in this section. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2. <u>ELV appropriate measures:</u> The operator confirmed that they currently meet the requirements of all appropriate measures in this section. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.
Waste storage, segregation and handling appropriate measures	CC	<u>WEEE appropriate measures:</u>

		The operator confirmed that they currently meet the requirements of all appropriate measures in this section. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2. <u>ELV appropriate measures:</u> The operator confirmed that they currently meet the requirements of all appropriate measures in this section. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.
Waste treatment appropriate measures	CC	<u>WEEE appropriate measures:</u> The operator confirmed that they currently meet the requirements of all appropriate measures in this section, with the exception of the following which are not applicable to the site's operations: • Measure 3 of section 5.2 • Measures 1-14 of section 5.5 • Measures 1-10 of section 5.6 • Measures 1-10 of section 5.7 • Measures 1-8 of section 5.8 • Measures 1-4 of section 5.9 • Measures 1-3 of section 5.11 • Measures 1-7 of section 5.12 Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2. <u>ELV appropriate measures:</u>

		The operator confirmed that they currently meet the requirements of all appropriate measures in this section. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.
Emissions control appropriate measures	FC	<u>WEEE appropriate measures:</u> The operator confirmed that they currently meet the requirements of all appropriate measures in this section with the exception of measure 5 of section 6.5, which requires contaminated and uncontaminated surface water to be segregated. Improvement condition IC9 has been included in the varied permit to address this. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2. <u>ELV appropriate measures:</u> The operator confirmed that they currently meet the requirements of all appropriate measures in this section. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.
Emissions monitoring and limits appropriate measures	FC	<u>WEEE appropriate measures:</u> The operator confirmed that they currently meet the requirements of the appropriate measures in this section with the exception of the following appropriate measure: • Appropriate Measure 1 of Section 7.1 which requires an emissions inventory for point source emissions to air. Improvement Condition IC 10 (a) and (b) has been included in the varied permit to address this. • Appropriate Measure 1 of Section 7.2 which requires an emissions inventory for point source emissions to water and sewer. Improvement Condition IC 10 (a) and (b) has been included in the varied permit to address this.

		Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2. <u>ELV appropriate measures:</u> The operator confirmed that they currently meet the requirements of all appropriate measures in this section. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.
Process efficiency appropriate measures	CC	<u>WEEE appropriate measures:</u> The operator confirmed that they currently meet the requirements of all appropriate measures in this section. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2. <u>ELV appropriate measures:</u> The operator confirmed that they currently meet the requirements of all appropriate measures in this section. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.
Reg 61 requirement	Assessment of response received	
Soil and groundwater risk assessment	The operator has chosen not to submit any baseline data. In doing so they accept that there is zero pre-existing contamination and the risk that they may be required to clean up any pre-existing contamination when the permit is surrendered.	
Medium combustion plant and specified generators	None on site	
Climate change	Submission of climate change risk assessment is no longer an application requirement. It now forms a part of the	

	operator's EMS and will be reviewed within compliance assessment.
Summary of other changes made to the permit as a result of our assessment of the Reg 61 response	
Change	Reason for change
Schedule 1 Activities	There are multiple changes to Table S1.1 Permitted Activities as a result of the review: • The limits for AR1, AR2 and AR3 have been removed and replaced with "subject to completion of pre-operational condition", as the metal shredding activity has been mothballed and the operator will need to receive written agreement from the Environment Agency prior to recommencing this activity. • AR4 has been removed from the permit as the storage of processed materials following treatment by AR1 will be covered by the limits of AR1 when the activity recommences. • AR5 "raw materials storage" is now AR4. • AR6 "discharge of process and/or surface water" has been removed as a DAA as this is now covered in Table S3.2. The permit previously listed the drainage of potentially contaminated site drainage as a Directly Associated Activity (DAA). Following a review against our guidance (RGN 2: Understanding the Meaning of Regulated Facility), we have determined that the discharge of site drainage via an interceptor does not meet the criteria for a DAA. Therefore, it is more appropriately captured within the emissions control requirements of the permit, particularly within the emissions to water table and relevant infrastructure conditions. • AR7 "vehicle storage, depollution and dismantling" is now AR5. Additional details added to the limits of AR5 include: permitted tonnages for storage, storage time limits, details on battery handling and storage. • AR8 "waste electrical and electronic equipment" is now AR6. Additional details added to the limits of AR6 include: battery storage and the total tonnage of hazardous waste to be stored on site at any one time in aggregate. Reference to shredding in AR6 has been removed as treatment of non-hazardous WEEE in the shredder will be included in the limits of AR1 when this activity recommences. • AR9 "metal recycling" is now AR7. Additional details added to the limits of AR7 include: limits on the total tonnage of hazardous waste to be stored on site at any one time in aggregate and time limits. • AR10 "treatment of hazardous catalytic converters" is now AR8. The maximum quantity of hazardous waste that can be stored and treated on site has been added. • AR11 "treatment of non-hazardous catalytic converters" is now AR9. • The limits for AR8 and AR9 have been removed and replaced with "subject to completion of pre-operational condition", as the treatment of hazardous and non-hazardous catalytic converters has been mothballed and the operator will need to receive written agreement from the Environment Agency prior to recommencing these activities.

	Granulation has been removed from the limits of AR7, AR8 and AR9 as the operator confirmed granulation is not carried out on site.
Change to the Tables S1.2, S1.3, S1.4 and S1.5, Schedule 1 of the permit	- Table S1.2 (operating techniques) has been updated to reflect the update to both the guidance and the documents approved by the Environment Agency as acceptable for site procedures. All superseded guidance and references have been removed and replaced. - Table S1.3 (Waste motor vehicle treatment minimum technical requirements) has been added. - Table S1.4 (Specified treatment methods for separately collected components of WEEE) has been removed as the site has confirmed they are not mechanically treating any WEEE. - Table S1.5 (Improvement Programme) has been updated with the new Improvement Conditions (IC9 and IC10 (a) and (b)), and completed improvement conditions have been removed: - IC 1, 2, 3 and 7 have been removed as these relate to the metal shredding activity, which is non-operational, therefore they cannot be completed. The site will have to confirm compliance with the metal shredding appropriate measures prior to recommencement of this activity. - IC 4, 5 and 6 have been superseded by IC10 (a) and (b). - IC 8 has been removed from the permit as it has been completed. - Table S1.6 (Pre-operational measures for future development) has been added, which requires the operator to obtain written agreement from the Environment Agency prior to recommencing the mothballed activities (AR1, AR8 and AR9).
Changes to Schedule 2	Changes that have been made to Schedule 2 are detailed in the “changes to EWC codes” section of this document.
Changes to Schedule 3, monitoring and emissions limits in the permit	- Changes to Table S3.1 to reflect that there is no point source emission to air on site until PO1 has been completed. - Changes to Table S3.2 to reflect new BAT AELs for Hydrocarbon Oil Index, Arsenic, Cadmium, Chromium, Copper, Lead, Nickel, Zinc, Mercury and PFOA/PFAS/Deca BDE.
Changes to Schedule 4, reporting	- Schedule 4 has been updated to reflect the changes made to Schedule 3 and the way the conditions have been presented has altered slightly.
Changes to Schedule 6, interpretation	Schedule 6 has been updated to include new definitions present in relation to the requirements of the Activities, Monitoring and Reporting of the permit. Some definitions have been removed in accordance with the change in guidance to the Appropriate Measures Guidance and updates to the Environmental Permitting Regulations 2016.

Decision Considerations

Confidential information

A claim for commercial or industrial confidentiality has not been made.

The decision was taken in accordance with our guidance on confidentiality.

Identifying confidential information

We have not identified information provided as part of the Regulation 61 notice response that we consider to be confidential.

The decision was taken in accordance with our guidance on confidentiality.

The site

The operator has provided a plan which we consider to be satisfactory.

The plan is included in the permit.

Operating techniques

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.

The operating techniques that the applicant must use are specified in S1.2 in the environmental permit.

Changes to the permit conditions

We have varied the permit as stated in the variation notice.

Improvement programme

We have included an improvement programme to ensure that the permit complies with the Treating Metal Waste in Shredders: Appropriate Measures for Permitted facilities guidance.

- Improvement Conditions IC1, 2, 3 and 7 have been removed from the permit. These improvement conditions were related to the metal shredding activity which is not operational.
- Improvement Conditions IC4, 5 and 6 have been superseded by IC10 (a) and (b), which require the operator to monitor their emissions and submit a report to demonstrate their results and conclusions including an H1 assessment and emissions inventory.

- Improvement Condition IC8 has been removed as this has been completed.
- Improvement Condition IC9 has been added to the permit which requires the operator to review and resubmit their drainage plan, in order to establish the feasibility of segregating clean and dirty water.

Changes to EWC codes

The following restrictions have been added to the waste codes below in Table S2.2, as when the site recommences AR1 only Large Domestic Appliances and street lights may be treated under this activity:

16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13 (cookers, washing machines, street lights, dishwashers and tumble dryers, excluding heat pump tumble dryers only)
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35 (cookers, washing machines, street lights, dishwashers and tumble dryers, excluding heat pump tumble dryers only)

The following waste codes have been removed from Table S2.3 as they have been deemed no longer relevant to AR5 (ELV depollution) by the operator:

16 01 07*	oil filters
16 01 11*	brake pads containing asbestos
16 01 12	brake pads other than those mentioned in 16 01 11
16 01 16	tanks for liquefied gas
16 01 17	ferrous metal
16 01 18	non-ferrous metal

The following waste codes have been added to Table S2.3 as they have been deemed relevant to the sites vehicle storage, depollution and dismantling waste operation (AR5):

16 01 19	plastic
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The restriction “WEEE cables only” has been added to the following waste codes in Table 2.4 (Permitted waste types and quantities for Waste Electrical and Electronic Equipment authorised treatment facility) as the site confirmed they accept cables only under this waste code:

16 02 15*	hazardous components removed from discarded equipment (WEEE cables only)
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15 (WEEE cables only)

The following waste codes have been added to Table S2.4 as they have been deemed relevant to the site’s WEEE operations:

20 01 23*	discarded equipment containing chlorofluorocarbons
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components

The following waste codes have been removed from Table S2.5 (Permitted waste types and quantities for metal recycling) as they have been deemed no longer relevant to AR7 (metal recycling) by the operator:

10 03 02	anode scraps
10 08 14	anode scrap
11 05 01	hard zinc
11 05 02	zinc ash
15 01 05	composite packaging
19 10 04	fluff-light fraction and dust other than those mentioned in 19 10 03
19 10 06	other fractions other than those mentioned in 19 10 05

17 02 01 was incorrectly listed as “copper, bronze, brass” on the variation notice issued 29/06/2023. This waste code applies to wood. This has been removed from the permit as agreed by the operator.

The following waste codes have been added to Table S2.5 (Permitted waste types and quantities for metal recycling) as they have been deemed relevant to the sites metal recycling waste operation. The site was previously utilising RPS276:

16 01 21*	hazardous components other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 16 01 14
17 04 10*	cables containing oil, coal tar and other hazardous substances

The following waste codes have been added to Table S2.5 (Permitted waste types and quantities for metal recycling) as they have been deemed relevant to the sites metal recycling waste operation:

16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13 (ferrous and non-ferrous metal waste only)
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15 (ferrous and non-ferrous metal waste only)
19 12 11*	other wastes (including mixture of materials) from mechanical treatment of wastes containing hazardous substances. Limited to fractions resulting from the mechanical treatment of ferrous and non-ferrous metals wastes
19 12 12	other wastes (including mixture of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11*. Limited to fractions resulting from the mechanical treatment of ferrous and non-ferrous metals wastes

Emission limits

Emission Limit Values (ELV's) and equivalent parameters or technical measures, based on Best Available Techniques – Achievable Emission Levels (BAT-AELS) for Waste Treatment, have been deleted for Total Suspended Particulates. Emission Limit Values for point source emissions to air will be assigned when the operator confirms to the Environment Agency the intention to recommence operation and provides supporting documents for approval demonstrating activities are in accordance with the requirements of the Waste Treatment BAT conclusions and Treating metal waste in shredders: appropriate measures for permitted facilities and other appropriate measures guidance as applicable.

Emissions limits have been added or amended for indirect emissions to sewer as a result of this variation based on Best Available Techniques – Achievable Emission Levels (BAT-AELS) for Waste Treatment:

- Hydrogen Oil Index – 10 mg/l
- Arsenic – 0.05 mg/l
- Cadmium – 0.05 mg/l
- Chromium – 0.15 mg/l

- Copper – 0.05 mg/l
- Lead – 0.3 mg/l
- Nickel – 0.5 mg/l
- Zinc – 2.0 mg/l
- Mercury – 0.005 mg/l

Monitoring

We have decided that monitoring should be added or amended for the following parameters, using the methods detailed and to the frequencies specified:

For discharges to sewer:

- At Emission Point 1 and 2 for PFOA, PFOS or Deca BDE the monitoring standard is BS ISO 25101 and the monitoring frequency is ever 6 months.

For diffuse emissions:

- Table S3.3 (Ambient monitoring requirements) has been included for Total Suspended Particulates as the site is permitted to accept wastes which may produce diffuse emissions due to their dusty nature, such as:

19 12 11*	other wastes (including mixture of materials) from mechanical treatment of wastes containing hazardous substances. Limited to fractions resulting from the mechanical treatment of ferrous and non-ferrous metals wastes
19 12 12	other wastes (including mixture of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11*. Limited to fractions resulting from the mechanical treatment of ferrous and non-ferrous metals wastes

These monitoring requirements have been included in order to comply with the requirements of the BAT conclusions for the sector.

We made these decisions in accordance with Best Available Techniques for Waste Treatment.

We made these decisions in accordance with Best Available Techniques for Waste Treatment.

Reporting

We have added or amended reporting in the permit for the following parameters:

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Ambient Air monitoring Parameters as required by condition 3.5.1	As agreed in writing by the Environment Agency.	Quarterly or as agreed in writing by the Environment Agency.	1 January
Emissions to Air Parameters as required by condition 3.5.1	As agreed in writing by the Environment Agency.	Every 6 months, or as agreed in writing by the Environment Agency.	1 January, 1 July
Emissions to water Parameters as required by condition 3.5.1	Emission Point 1 and Emission Point 2	Every 6 months, or as agreed in writing by the Environment Agency.	1 January, 1 July

We made these decisions in accordance with Best Available Techniques for Waste Treatment.

Growth Duty

We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 100 of that Act in deciding whether to grant the variation of this permit.

Paragraph 1.3 of the guidance says:

“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”

We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.

We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards

applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.