Permitting Decisions- Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for Airbag Disposal operated by Vantage Waste Solutions 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/FB3702UD/V005.

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 Waste Batteries, WEEE treatment and transfer and Treating metal waste in shredders, 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

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 21 May 2026 our Waste Batteries appropriate measures guidance was published on gov.uk.

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).

On 20th October 2021 our Treating metal waste in shredders appropriate measures guidance was published on gov.uk.

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

We issued a notice under regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 (a Regulation 61 Notice) on 29/06/2026 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 batteries, WEEE, and metal waste in shredders.

The notice 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 of 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 02/10/2026 for activities relating to treatment of waste batteries, WEEE, and metal waste in shredders.

We considered that the response did not contain sufficient information for us to commence determination of the permit review. We therefore issued a further information request to the operator. Suitable further information was provided by the operator on 27/10/2026 and 30/10/2026.

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	WEEE Appropriate Measures The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the other 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 Battery Appropriate Measures The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the other 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. Treating Metal Waste in Shredders: Appropriate Measures The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the other 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	WEEE Appropriate Measures The operator confirmed that they currently meet the requirements of the appropriate measures in this section.

		Compliance with the other 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 Battery Appropriate Measures The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the other 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. Treating Metal Waste in Shredders: Appropriate Measures The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the other 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	WEEE Appropriate Measures The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the other 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 Battery Appropriate Measures The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the other 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. Treating Metal Waste in Shredders: Appropriate Measures

		The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the other 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 the appropriate measures in this section. Compliance with the other 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>Waste Battery Appropriate Measures</u> The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the other 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>Treating Metal Waste in Shredders: Appropriate Measures</u> The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the other 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	CC	<u>WEEE Appropriate Measures</u> The operator confirmed that they currently meet the requirements of the appropriate measures in this section.

		Compliance with the other 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 Battery Appropriate Measures The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the other 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. Treating Metal Waste in Shredders: Appropriate Measures The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the other 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	CC	WEEE Appropriate Measures The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the other 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 Battery Appropriate Measures The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the other 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. Treating Metal Waste in Shredders: Appropriate Measures

		The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the other 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 the appropriate measures in this section. Compliance with the other 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>Waste Battery Appropriate Measures</u> The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the other 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>Treating Metal Waste in Shredders: Appropriate Measures</u> The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the other 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 not provided a soil and groundwater risk assessment; however a Site Condition Report was submitted on 25/03/2023 as part of the previous variation.	

Medium combustion plant and specified generators	No MCPs or generators are present on site.
Summary of other changes made to the permit as a result of our assessment of the Reg 61 response	
Change	**Reason for change**
Activities Table (S1.1)	The previous permit consisted of the following waste operations: • AR2 – Hazardous Waste Treatment; and • AR3 – Non-hazardous Waste Treatment. These activities comprised of several operations that we have regularised to make clear within the permit. As a result, the following waste operations are now present within the permit: • AR2 – Waste Electrical and Electronic Equipment; • AR3 – Metal Recycling; • AR7 – Treatment of Hazardous Waste (manual stripping of cables); • AR8 – Treatment of Airbags; and • AR9 – Treatment of Non-hazardous Waste.
Activities Table (S1.1)	We have included the following waste operations within the permit: • AR4 - Treatment of Hazardous and Non-Hazardous Waste - Manual Sorting of Batteries by Chemistry to Enable their Recovery. • AR5 – Dismantling of Waste Batteries • AR6 – Repackaging of Hazardous and Non-hazardous Batteries The treatment of batteries was applied for and assessed within the previous variation but was not included within the permit. This permit review has confirmed that the operator is complying with all relevant measures under the Waste Battery: Appropriate Measures and included the previously applied for operation within the permit.
Operating Techniques (S1.2)	We have updated the operating techniques table to include the relevant appropriate measures and additional supporting information provided within the Regulation 61 Notice and subsequent queries.

Improvement programme requirements (S1.5)	We have removed Table S1.5 (Improvement programme requirements) and improvement condition IC3, which required the operator to submit an emissions inventory and carry out a H1 assessment. This condition has been discharged as the operator has completed this Improvement Condition. No other Improvement Conditions are required as a consequence of this permit review.
Waste code tables	The previous permit consisted of two waste code tables (S2.2 and S2.3). We have amended this list to consist of 9 tables that correspond to the specified activities. This includes: • S2.2 - Hazardous waste storage • S2.3 – WEEE treatment • S2.4 – Metal recycling treatment • S2.5 – Manual sorting and repackaging of hazardous and non-hazardous waste batteries • S2.6 – Dismantling of non-hazardous waste batteries • S2.7 – Manual stripping of hazardous electrical and communications cable • S2.8 – Treatment of airbags • S2.9 – Treatment of non-hazardous waste
Waste codes	We have removed the following waste codes at the request of the operator: • 17 02 04* - glass, plastic and wood containing or contaminated with hazardous substances • 03 03 07 – mechanically separated rejects from pulping of waste paper and cardboard • 03 03 08 – wastes from sorting of paper and cardboard destined for recycling • 12 01 05 – plastics shavings and turnings We have restricted the following waste codes to clarify what is accepted: • 16 01 10* - explosive components (for example airbags) • 16 01 21* - hazardous components other than those mentioned in 16 01 07 to 16 01 011 and 16 01 13 and 16 01 14 (other hazardous ELV components) • 16 01 22 – components not otherwise specified (other ELV components) • 16 02 13* - discarded equipment containing hazardous components other than those mentioned in 16 02 (IT equipment, computers, servers, telecommunications equipment and electrical control equipment) • 16 02 15* - hazardous components removed from discarded equipment (circuit boards, capacitors, mercury containing switches, electrical assemblies)

	• 16 02 16 - components removed from discarded equipment other than those mentioned in 16 02 15 (circuit boards, capacitors, mercury containing switches and electrical assemblies only) • 16 04 02* - fireworks wastes (flares only) • 16 05 04* - gases in pressure containers (including halons) containing hazardous substances (fire extinguishers only) • 20 01 35* - discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components (small domestic electrical appliances, computers, laptops, printers, telecommunication equipment and small electronic devices) We have added the following waste code within the permit: • 17 04 11 – cables other than those mentioned in 17 04 10 This is a mirror non-hazardous code we have added as the operator accepts 17 04 10* - cables containing oil, coal tar and other hazardous substances or cables containing hazardous substances other than oil and coal tar.
Emissions and monitoring (Table S3.1)	We have removed Emission Point A1 from the permit. A1's purpose was to extract and abate emissions from the airbag destruction plant that may give rise to emissions on deployment. The operator has submitted evidence of completion of IC3 that related to the emissions inventory and H1 assessment of the two previous emission points on site. EAWML 404425 includes an email sent from the operator on 17/09/2026 that requests to exclude A1 emission point from the current emissions testing that was required as part of IC3. This is because the airbag destruction method has been changed to a waterjet cutting system which does not emit emissions. Airbags sit within a water bath, and a waterjet is used to destruct them whilst submerged. Material particles are contained within the water bath. It was agreed on 24/09/2026 that there is no requirement to emissions test A1. This is further confirmed within the 'Area Form – Regulatory 61 Notice Response' submitted on 23/10/2026, it was confirmed that there are no outstanding Improvement Conditions.
Schedule 7 (Site Plan)	The operator has provided an updated site plan that includes the location of emission point A2. This has been incorporated into Schedule 7 of the permit.

Permitting Decisions- Environment Agency Initiated Variation

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 regulated facility

We considered the extent and nature of the facility at the site in accordance with RGN2 ‘Understanding the meaning of regulated facility’, Appendix 2 of RGN2 ‘Defining the scope of the installation’, Appendix 1 of RGN 2 ‘Interpretation of Schedule 1’.

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.

Changes to EWC codes

We have removed the following waste codes at the request of the operator:

- 17 02 04* - glass, plastic and wood containing or contaminated with hazardous substances
- 03 03 07 – mechanically separated rejects from pulping of waste paper and cardboard
- 03 03 08 – wastes from sorting of paper and cardboard destined for recycling
- 12 01 05 – plastics shavings and turnings

We have restricted the following waste codes to clarify what is accepted:

- 16 01 10* - explosive components (for example airbags)
- 16 01 21* - hazardous components other than those mentioned in 16 01 07 to 16 01 011 and 16 01 13 and 16 01 14 (other hazardous ELV components)
- 16 01 22 – components not otherwise specified (other ELV components)
- 16 02 13* - discarded equipment containing hazardous components other than those mentioned in 16 02 (IT equipment, computers, servers, telecommunications equipment and electrical control equipment)
- 16 02 15* - hazardous components removed from discarded equipment (circuit boards, capacitors, mercury containing switches, electrical assemblies)
- 16 02 16 - components removed from discarded equipment other than those mentioned in 16 02 15 (circuit boards, capacitors, mercury containing switches and electrical assemblies only)
- 16 04 02* - fireworks wastes (flares only)
- 16 05 04* - gases in pressure containers (including halons) containing hazardous substances (fire extinguishers only)
- 20 01 35* - discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components (small domestic electrical appliances, computers, laptops, printers, telecommunication equipment and small electronic devices)

We have added the following waste code within the permit:

- 17 04 11 – cables other than those mentioned in 17 04 10

This is a mirror non-hazardous code we have added as the operator accepts 17

04 10* - cables containing oil, coal tar and other hazardous substances or cables containing hazardous substances other than oil and coal tar.

Emission limits

We have removed Emission Point A1 from the permit.

A1's purpose was to extract and abate emissions from the airbag destruction plant that may give rise to emissions on deployment.

The operator has submitted evidence of completion of IC3 that related to the emissions inventory and H1 assessment of the two previous emission points on site. EAWML 404425 includes an email sent from the operator on 17/09/2026 that requests to exclude A1 emission point from the current emissions testing that was required as part of IC3. This is because the airbag destruction method has been changed to a waterjet cutting system which does not emit emissions. Airbags sit within a water bath, and a waterjet is used to destruct them whilst submerged. Material particles are contained within the water bath. It was agreed on 24/09/2026 that there is no requirement to emissions test A1.

This is further confirmed within the 'Area Form – Regulatory 61 Notice Response' submitted on 23/10/2026, it was confirmed that there are no outstanding Improvement Conditions.

Monitoring

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

- Total VOCs – 6 monthly
- Brominated flame retardants – Annually
- Dioxin-like polychlorinated biphenyls – Annually
- Metals (As, Cd, Co, Cr, Cu, Mn, Ni, Pb, Sb, Se, Tl, V) - Annually
- Dioxins and furans (PCDD/F) – Annually

These monitoring requirement have been included in order to align with the compliance with Section 7 of Treating metal waste in shredders: appropriate measures for permitted facilities and WEEE: appropriate measures for permitted facilities.

The previous variation undertaken in 2024 included the monitoring requirements for dust, with an improvement programme to carry out an emissions inventory and H1 assessment of relevant parameters, with a one off test for monitoring emissions. Whilst all above parameters were monitored and tested for, the

inclusion of these parameters is to ensure ongoing monitoring allows for further data to be collected, whereby monitoring can be reduced if emission levels are proven to be sufficiently stable.

Reporting - reporting has been added for process monitoring

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

- Process monitoring – SMW mass balance
- Process monitoring – WEEE (chemical analysis)

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.