

FREEDOM RECYCLING LTD

PAS 402 ANNUAL REPORT

2026

(1st July 2025 -30th June 2026)



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Directors Forward

Freedom Recycling is a family owned and operated waste and recycling company established in 2005. Over the past 21 years Freedom Recycling has grown into a skip hire, transfer station, MRF and commodities trader.

The growth and development of our Hockwold waste site facility has enabled the business to manage and improve the recycling and recovery of clients' materials in a responsible and sustainable manner. All materials are sorted and processed in-house maximising the percentage of material recycled for further use and recovered for EFW and power production at third party facilities.

The implementation of the PAS 402 resource management system demonstrates Freedom Recycling's commitment to resource efficiency, regulatory compliance and continual improvement. This report summarises the company's operational scope, environmental considerations, management systems, and performance during the reporting period.

This document was produced in accordance with and generally follows the main headings of PAS 402:2025.

This report has been read and approved by: Paul Boyle (Managing Director)

Signed:

Date: September 2026

Scope of operations

Location

Freedom Recycling Limited (FRL) is located in a rural setting 1km to the northeast of Hockwold village. The site is accessed from the B1112 along Cowles Drove. There is an adjacent engineering works to site and housing and recreational fishing lakes further past the site. The site was previously a vegetable processing plant ceasing operations in 2003.

The site extends to approximately 4ha. The area covered by the environmental permit is shown on the permit boundary plan. There is a low risk of flooding or surface water.

The site is situated on a major aquifer which is overlain with soils of an intermediate leaching potential. The design of the facility with the use of Type 1 interceptor tanks ensure that groundwaters are given adequate protection.



Description of business activities

For our waste management site in Hockwold, Thetford, our Environmental Permit is registered in the trading name of Freedom Recycling Ltd (EPR/KP3796NE). The Permit allows for the operation of a material recycling facility and Waste electrical and electronic equipment authorised treatment facility, for the waste types as contained in Appendix 1 of this document up to an annual total of 41,000 tonnes. In addition to our Environmental Permit and we also have planning permission for this site, reference number (FUL/2021/0035), and have no registered exemptions for our waste activities at this site.

All incoming materials are received at reception weighbridge where they are identified, given appropriate EWC coding and weighed in on our 50-tonne calibrated weighbridge. Materials are incoming on FRL own vehicles as well as third party waste companies. Incoming material is checked and identified prior to tipping at the operational pad. Acceptance or rejection is

relayed to weighbridge by two-way radio. If material is rejected it is returned to source. Following satisfactory inspection, all waste is stored / treated as detailed in the site permit and shown in Appendix 1 of this document.

FRL has manual and mechanical sorting facilities and as a company is continually promoting the further reduction of the waste that it sends to landfill. Waste is sorted, separated, trommelled, shredded and stored in separate bays ready to be dispatched off site for further recycling, recovery or end use.

Client Relationship

FRL regularly visit new and existing customers to discuss and advise on waste and recycling of materials such as segregation methods. This is with the aim of increasing recycling, efficiencies as well as economic benefits to the client. A strong understanding of customers operations alongside our knowledge of the waste industry helps to increase the level of recycling and recovery achieved.

Staff at the company's office are fully competent to deal with any enquiries for services including financial, collection arrangements by the fleet of skips ranging from 4 cu.yd. mini skips to 40 cu.yd RORO's, their proposed location, charges or recycling statistics, advice on waste separation at source, access to customer premises etc. A wide range of information on the services offered is available on our website.

FRL also operate three walking floor articulated lorries for the bulk removal of sorted product, as well as operating a 45-foot curtain-sider for the collection of baled recyclable materials such as cardboard and plastics.

As well as the services provided to our customers, we also recognise that we have duties to meet the requirements of the receiving sites of our outgoing materials. We therefore work with all our outlets to ensure that the material we provide them is of the best quality possible for their needs.

FRL believe that feedback from our customers is the most useful tool for helping us to improve our services and therefore we are always pleased to receive your views on what we did well and also where you would like us to improve. All complaints are dealt with initially by our administrative team and if necessary, they will inform the relevant Manager. In either case you can be sure that your concerns will be given due consideration and that we will implement appropriate corrective and preventive actions where appropriate.

Impacts and Risks

Risk Assessments

We manage all operational health and safety risks through comprehensive risk assessments and method statements maintained by our external consultant, Construction and Electrical Safety Services. These assessments, alongside our third-party fire risk assessment, are logged in a dedicated register and reviewed annually or whenever incidents and operational changes occur (see example below).

		Risk Assessment In accordance with Regulation 3 of The Management of Health and Safety at Work Regulations 1999										
TITLE		Operating a Telehandler				DATE OF THIS ASSESSMENT		July 2025		No. FRL/RA	024	
LOCATION		Main Premises				NEXT REVIEW DATE		July 2026		ISSUE No.	03	
No. OF EMPLOYEES AT RISK	1+	HOW OFTEN	Daily		SIGNED	Ian Mason		NAME OF PERSON MAKING ASSESSMENT		Ian Mason		
REASON FOR ASSESSMENT	Initial	Periodic Review		✓	Change of Risk		Following an Accident		Other			
PERSONS CONSIDERED TO BE AT RISK	Employees	✓	General Public		Children		Contractors		✓	Visitors		
ADDITIONAL CONTROLS	Health Surveillance Required	Supervision		✓	Training		✓					
RISK TO HEALTH		DEGREE OF RISK			RESIDUAL RISK & PRIORITY - If further action is required details to be entered at bottom of page							
		L	S	T				L	S	T	Action Required	
TASK/ACTIVITY	HAZARD	1-5	1-5	1-25	EXISTING CONTROLS			1-5	1-5	1-25	Yes/No	Priority
Loading and unloading of materials using Telehandler	Overturning	5	5	25	Trained, certificated and competent operators only. Telehandler will be operated as per training and manufacturer's instructions. Seat belts will be used when operating. Awareness of ground conditions. Vehicle will only be operated on firm, level ground, avoiding slopes and gradients. Drivers will not be under the influence of Drugs or Alcohol. The Loading Shovel including attachments will be visually checked before use for signs of damage, worn and loose items. Roll-Over Protection System fitted. The Loading Shovel will be serviced and maintained as specified by the manufacturer and under PUWER and LOLER. Operators will be aware of vehicle SWL and will not exceed it. Operators will be aware of the maximum reach of the telehandler arm. Ensure any attachments are checked as part of daily check routine.			1	5	5	No	N/A
	Overloading											
	Load falling from forks	4	5	20	Correct selection of Telehandler and accessories for the task. Correct techniques of driving implemented. Segregated from unnecessary persons. Adhering to Safe Working Loads. Driven at correct speed for ground conditions and site speed limits. Loads will be secured safely before movement. Plant route to be checked and clear of obstructions both at ground level and at height. Attachment to be used for lifting operations			1	5	5	No	N/A

Moreover, our operational activities are systematically assessed to identify environmental impacts, specifically focusing on dust, noise, waste storage, fuel spillage, and containment. To mitigate identified hazards, we implement strict control measures, including dust suppression, restricted working hours, engineered containment systems, and rapid spill response protocols.

Additionally, we have conducted a comprehensive climate change risk assessment stretching to the year 2050, strictly adhering to the Environment Agency guidance, 'Adapting to Climate Change: Risk Assessment for Your Environmental Permit'. This assessment evaluated changing average weather conditions (such as extreme rainfall and waterlogging), combined hazard impacts, and critical operational tipping points. The assessment concluded that while warmer, drier conditions pose a minor risk of increased dust emissions, the site's core operations face no significant risk from rising winter temperatures, intense rainfall, sea-level rise, or increased watercourse flows.

Site Security

The site is accessed via Cowles Drove through a single main gate across a bridge, which serves as the sole entry point for vehicles. The facility is continuously manned during operational hours and monitored by a CCTV system during off-hours. For perimeter security, the remainder of the site is partly fenced where it borders agricultural fields and watercourses, and the entire property is fully illuminated by night-time floodlighting.

Markets

We proactively monitor material sales and disposal markets by leveraging our established supplier network, reviewing industry journals, and tracking emerging macroeconomic trends. This continuous market analysis allows us to capitalize on our diverse business structure, enabling different divisions to provide mutual strategic support as market conditions dictate.

Technical Competence

To ensure that we always have sufficient coverage, FRL employs two WAMITAB holders:

- Paul Boyle
- Mark Everett

Insurance

FRL has in place appropriate Insurance Policies that are provided through our broker GM Insurance. These are annually reviewed for coverage and competitive pricing.

Operational Management

Definition of roles

As a family-owned and operated business, we believe it is vital that all team members, regardless of role, are fully inducted into our core company ethos. While we maintain a clearly defined operational structure where everyone has distinct responsibilities, we firmly believe that every individual is equally valuable in ensuring our business runs safely, efficiently, and successfully.

Waste Control

Waste management operations utilize strict segregation and containment protocols within designated bays throughout processing. These specialized storage areas securely hold materials to prevent dust emissions and environmental leaching prior to off-site transport for recycling. Furthermore, site management continuously monitors inventory levels to ensure absolute compliance with environmental permit quantity thresholds.

Auditing

Every incoming and outgoing load is systematically recorded using our on-site weighbridge system. The captured data includes the customer details, haulage contractor, vehicle registration, material type, destination, European Waste Catalogue (EWC) code, and net weight. In strict compliance with our environmental permit, this data is used to compile and submit quarterly waste returns to the Environment Agency (EA), detailing all material movements from the preceding three months.

Resources

Our management team systematically identifies and controls the operational resources required for business continuity. Resource allocation is monitored continuously by management and formally evaluated during weekly review meetings. We continuously evaluate and update our operational equipment across all stages of processing, including material handling, shredding, weighing, sorting, and transport. Maintaining a modern, reliable fleet allows us to maximize efficiency and consistently provide the best possible value to our clients.

Risks from the use of plant and equipment

All plant and machinery are serviced in accordance with manufacturers recommendations. Operators are fully trained and aware of maintaining machines from greasing, lubrication and general care. To guarantee strict adherence to our environmental permit, we conduct daily and weekly site inspections, alongside mandatory pre-commencement vehicle and plant checks every working day. Furthermore, our robust planned preventative maintenance (PPM) procedures ensure that all essential plant and equipment operate at peak efficiency, successfully minimizing operational downtime.

Competence

Freedom Recycling Limited (FRL) ensures all operations are conducted by technically competent and qualified personnel. Training requirements are systematically identified through detailed job analysis and relevant task-specific risk assessments. New employees undergo a rigorous induction process, followed by a structured mentoring period with a competent staff member who formally determines when they can work unsupervised.

To maintain operational integrity, staff are promptly briefed on any regulatory or operational changes, such as the introduction of new legislation. Where required, external training is secured to achieve industry-recognised certification standards, including WAMITAB, IOSH, NEBOSH, and Ofqual qualifications. Crucially, FRL employs two full-time management team members who hold a WAMITAB Level 4 Certificate of Competence in the Management of

[illegible]

Our management team ensures absolute legal compliance by actively monitoring statutory obligations through external specialists and frequent liaison with regulatory bodies. Daily operational monitoring and site inspections enable us to identify non-compliances rapidly and implement effective remedial actions, with all significant findings documented in the site diary.

Performance Review

To achieve improvements to waste management operations there are a number of areas throughout the business that we aim to improve and invest in. FRL are continually reviewing recycling and reprocessing methods and techniques, environmental management, transport operations and efficiencies along with improving health and safety standards and procedures, ensuring a safe and productive workplace for all staff.

Between the 1st of July 2025 and 30th June 2026, our incoming waste totalled 35,443 tonnes. Of the 31,355 tonnes that left our site in this period, our landfill diversion rate is 100% and our material recovery rate is 100%. However, it should be noted that landfill diversion and material recovery rates are not verified where any or all materials are sent to a third-party organization that does not conform to the requirements of PAS 402.

In addition to the incoming waste during the reporting period, there was also an existing stockpile of approximately 2,200 tonnes of unprocessed and processed waste/material. At the end of the reporting period, we were left with an approximate stockpile of 6,288 tonnes of unprocessed and processed waste/material. Tables 1 to 3 below provide a summary of our performance, as well as a breakdown of individual material recovery and disposal tonnages. To obtain these figures, we ensure that all loads both entering and leaving the site are weighed using our calibrated weighbridge system.

Table 1 – Performance Summary

Performance Summary	Total Tonnes
Total materials input this period	35,443
Waste used/retained on site this period e.g. engineering purposes	0
Waste remaining on site at the end of this period (unprocessed)	5,088
Waste remaining on site at the end of this period (processed)	1,200
Total waste remaining on site at the end of this period	6,288
Waste sent offsite for reuse/repair this period	0
Waste sent offsite for recycling this period	6,444
Waste sent offsite for energy recovery this period	2,631
Qualifying fines	22,280
Non-qualifying fines	0
Materials sent offsite as non-waste this period e.g. end of waste	0
Waste sent off for disposal (incineration without energy recovery)	0
Waste sent off for disposal to landfill	0
Total waste sent off site this period	31,355

Table 2 – Annual Recovery and Disposal Tonnages

Incoming LOW / EWC codes	Incoming Tonnage	Outgoing LOW / EWC recovery/disposal code and description	Outgoing Tonnage	Waste Stream	Destination Treatment Description
Aggregates – 17 01 07	886	Aggregates – 17 01 07 (R05)	2,002	Aggregates – 17 01 07	Recycling
Mixed Municipal – 20 03 01	1,116				

Incoming LOW / EWC codes	Incoming Tonnage	Outgoing LOW / EWC recovery/disposal code and description	Outgoing Tonnage	Waste Stream	Destination Treatment Description
Ferrous Metal – 19 12 02	80	Ferrous Metal – 19 12 02 (R04)	643	Ferrous Metal – 19 12 02	Recycling
Mixed Municipal – 20 03 01	563				

Incoming LOW / EWC codes	Incoming Tonnage	Outgoing LOW / EWC recovery/disposal code and description	Outgoing Tonnage	Waste Stream	Destination Treatment Description
Mixed Municipal – 20 03 01	22,280	Fines – 19 12 12 (R11)	22,280	Fines – 19 12 12	Landfill Cover

Incoming LOW / EWC codes	Incoming Tonnage	Outgoing LOW / EWC recovery/disposal code and description	Outgoing Tonnage	Waste Stream	Destination Treatment Description
Gypsum – 17 08 02	638	Gypsum – 17 08 02 (R03)	674	Gypsum – 17 08 02	Recycling
Gypsum – 17 08 02 (existing stockpile)	36				

Incoming LOW / EWC codes	Incoming Tonnage	Outgoing LOW / EWC recovery/disposal code and description	Outgoing Tonnage	Waste Stream	Destination Treatment Description
Paper & Cardboard – 19 12 01	1,284	Paper & Cardboard – 19 12 01 (R03)	1,556	Paper & Cardboard – 19 12 01	Recycling
Mixed Municipal – 20 03 01	272				

Incoming LOW / EWC codes	Incoming Tonnage	Outgoing LOW / EWC recovery/disposal code and description	Outgoing Tonnage	Waste Stream	Destination Treatment Description
Plastic & Rubber – 19 12 04	1,351	Plastic & Rubber – 19 12 04 (R03)	1,569	Plastic & Rubber – 19 12 04	Recycling
Mixed Municipal – 20 03 01	218				

Incoming LOW / EWC codes	Incoming Tonnage	Outgoing LOW / EWC recovery/disposal code and description	Outgoing Tonnage	Waste Stream	Destination Treatment Description
Wood – 17 02 01	1,489	Wood – 19 12 07 (R01)	2,631	Wood – 19 12 07	Energy Recovery

Table 3 – Material processed, reported as a percentage of the annual outgoing material (%), per waste hierarchy category

Waste Hierarchy Category	Annual %
Reuse	0
Repair	0
Recycle	21
Energy Recovery	8
Landfill Cover	71
Disposal	0

Appendix 1 – Environmental Permit (EPR/KP3796NE)

Notice of transfer and variation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Freedom Recycling Limited

Freedom Farm
Cowle's Drove
Hockwold
Thetford
Norfolk
IP26 4JQ

Transfer application number

EPR/KP3796NE/V004

Permit number

EPR/KP3796NE

Freedom Farm

Permit number EPR/KP3796NE

Introductory note

This introductory note does not form a part of the notice

The following notice gives notice of the transfer in part of an environmental permit to a new operator (the transferee) and the changes made to the original permit (the transferor's permit).

This notice partially transfers the activity for the treatment of waste oils and fats to create LF100 biofuel and the associated area of land (hatched green area in Schedule 7) to Living Fuels Limited (EPR/HB3709FY/T001).

As a result of this partial transfer, the original permit (EPR/KP3796NE) has been varied to remove conditions and references to the transferred activity, as above. The operator has also requested to update the permit to modern conditions.

Any changes made as a result of the part transfer are set out in Schedule 1.

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

Status log of the permit		
Description	Date	Comments
Licence EAWML 75188 issued	22/01/2007	
Licence EAWML 75188 modified	07/11/2008	
EPR reference EPR/KP3796NE allocated		
Application EPR/KP3796NE /V003	Duly made 14/10/2009	Application to add production of LF100 standard end of waste oil facility to permit.
Variation determined EPR/KP3796NE	12/02/2010	
Application EPR/KP3796NE/V004 (part transfer of permit EPR/KP3796NE)	Duly made 11/10/2019	Application to transfer the treatment of waste oils and fats facility to Living Fuels Limited. Application to consolidate and update the original permit to modern conditions.
Transfer determined EPR/KP3796NE	11/02/2020	Transfer of treatment of waste oils and fats facility complete. Original permit consolidated and updated to modern conditions.

End of introductory note

Notice of transfer

The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 21 of the Environmental Permitting (England and Wales) Regulations 2016 transfers part of

Permit number

EPR/KP3796NE

Issued to

Freedom Recycling Limited ("the operator")

whose registered office is

**Freedom Farm
Cowles Drove
Hockwold
Thetford
Norfolk
IP26 4JQ**

company registration number 05597079

to operate a regulated facility at

**Freedom Farm
Cowle's Drove
Hockwold
Thetford
Norfolk
IP26 4JQ**

to Living Fuels Limited

The retained part of the permit is varied to the extent set out in the schedules.

The notice shall take effect from 11/02/2020

Name	Date
Tracey Pollard	11/02/2020

Authorised on behalf of the Environment Agency

Schedule 1

All conditions have been varied by the consolidated permit as a result of the application made by the operator.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/KP3796NE

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

Freedom Recycling Limited ("the operator"),

whose registered office is

**Freedom Farm
Cowles Drove
Hockwold
Thetford
Norfolk
IP26 4JQ**

company registration number 05597079

to operate waste operations at

**Freedom Farm
Cowle's Drove
Hockwold
Thetford
Norfolk
IP26 4JQ**

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

Name	Date
Tracey Pollard	11/02/2020

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 Avoidance, recovery and disposal of wastes produced by the activities

- 1.2.1 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.
- 1.2.2 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”).

2.2 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 All activities shall take place on impermeable surfaces with sealed drainage, unless otherwise specified in Table S1.1 or agreed in writing with the Environment Agency.
- 2.3.2 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 tables S2.1 and S2.2; and

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

2.4 Hazardous waste storage and treatment

- 2.4.1 Hazardous waste shall not be mixed, either with a different category of hazardous waste or with other waste, substances or materials, unless it is authorised by schedule 1 table S1.1 and appropriate measures are taken.

2.5 WEEE storage and treatment

- 2.5.1 Spillage collection facilities and, where appropriate, decanters and cleanser-degreasers shall be provided and used as necessary.
- 2.5.2 WEEE (disassembled spare parts, components and residues) shall be stored in areas provided with a weatherproof covering where appropriate or in containers providing a weatherproof covering where appropriate.
- 2.5.3 WEEE shall be treated using best available treatment, recovery and recycling techniques (BAT/RTT).
- 2.5.4 All fluids contained within any WEEE shall be removed prior to further treatment.
- 2.5.5 As a minimum, the substances, preparations and components specified in table S1.2 shall be removed from any separately collected WEEE.
- 2.5.6 Separately collected components of WEEE specified in table S1.3 shall be treated in accordance with the methods specified in that table.
- 2.5.7 Any liquids including those in disassembled spare parts, batteries, capacitors containing PCBs/PCTs and any other hazardous waste shall be stored in suitable sealed and labelled containers.
- 2.5.8 Equipment shall be provided and used to record the weight of untreated WEEE accepted at, and components and materials leaving the site.

3 Emissions and monitoring

3.1 Emissions of substances not controlled by emission limits

- 3.1.1 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.
- 3.1.2 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.
- 3.1.3 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.

3.2 Odour

- 3.2.1 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.

3.2.2 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.

3.3 Noise and vibration

3.3.1 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.

3.3.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to 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.

3.4 Pests

3.4.1 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.

3.4.2 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, hazard or annoyance from pests;
- (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Fire prevention

3.5.1 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.

3.5.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to a risk of fire, submit to the Environment Agency for approval within the period specified, a fire prevention plan which prevents fires and minimises the risk of pollution from fires;
- (b) implement the fire prevention plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

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 Within one 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 The Environment Agency shall be notified without delay following the detection of:

- (a) 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;
- (b) the breach of a limit specified in the permit; or
- (c) any significant adverse environmental effects.

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.

4.4 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 "without delay", in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities	
Description of activities for waste operations	Limits of activities
Material recycling facility R3: Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes) R4: Recycling/reclamation of metals and metal compounds R5: Recycling/reclamation of other inorganic materials R12: Exchange of wastes for submission to any of the operations numbered R1 to R11 R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced) D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced)	Physical treatment including physical sorting, screening, shredding, crushing or baling of non-hazardous waste for disposal (no more than 50 tonnes per day) or recovery. The maximum quantity of hazardous waste that can be stored at the site shall not exceed 50 tonnes at any one time. Subject to any other requirements of this permit wastes shall be stored for no longer than 1 year prior to disposal or 3 years prior to recovery. The capacity of the site for non-hazardous waste subject to a R3 activity (Biological treatment only) shall not exceed 75 tonnes per day. Waste types as specified in Table S2.1.
Waste electrical and electronic equipment authorised treatment facility R5: Recycling/reclamation of other inorganic materials R12: Exchange of wastes for submission to any of the operations numbered R1 to R11 R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced) D15: Storage pending any of the operations numbered D 1 to D 14 (excluding temporary storage, pending collection, on the site where the waste is produced)	Treatment consisting only of sorting, dismantling, separation, shredding, screening, grading, baling, shearing, compacting, crushing, granulation, repair or refurbishment, or cutting of waste into different components for recovery. Except for WEEE awaiting manual sorting, manual dismantling, repair or refurbishment only the maximum quantity of hazardous waste (in aggregate) that can be stored at the site shall not exceed 50 tonnes at any one time. Except for manual sorting, manual dismantling, repair and refurbishment of WEEE, no more than 10 tonnes per day of hazardous waste to be treated at the site under an R3, R4 or R5 activity. Treatment of WEEE shall be carried out within a building provided with a weatherproof covering.

Table S1.1 activities	
Description of activities for waste operations	Limits of activities
	Buildings, covered areas or containers shall meet the following requirements: • buildings, covered areas, or containers shall be designed, constructed and maintained to prevent ingress of rain and surface water; • rain and uncontaminated surface water shall be kept separate from contaminated water and other liquids; • containers containing waste shall be stored on an impermeable surface with sealed drainage system. Waste types as specified in Table S2.2.

Table S1.2 Substances, preparations and components to be removed from separately collected WEEE
• Capacitors containing polychlorinated biphenyls in accordance with Council Directive 96/59/EC of 16 September 1996 on the disposal of polychlorinated biphenyls and polychlorinated terphenyls (PCB/PCT) • Mercury-containing components, such as switches or backlighting lamps • Batteries • Printed circuit boards of mobile phones generally, and of other devices if the surface of the printed circuit board is greater than 10 square centimetres • Toner cartridges, liquid and paste, as well as colour toner • Plastic containing brominated flame retardants • Asbestos waste and components which contain asbestos • Cathode ray tubes • Chlorofluorocarbons (CFC), hydrochlorofluorocarbons (HCFC), hydrofluorocarbons (HFC), or hydrocarbons (HC) • Gas discharge lamps • Liquid crystal displays (together with their casing where appropriate) of a surface greater than 100 square centimetres and all those back-lighted with gas discharge lamps • External electric cables • Components containing refractory ceramic fibres as described in REGULATION (EC) No 1272/2008 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006. • Components containing radioactive substances with the exception of components that are below the exemption thresholds set in Article 3 of and the Annex I to Council Directive 96/29/Euratom of 13 May 1996 laying down basic safety standards for the protection of the health of workers and the general public against the dangers arising from ionising radiation • Electrolyte capacitors containing “substances of concern” (height > 25mm, diameter > 25mm or proportionately similar volume)

Table S1.3 Specified Treatment Methods for separately collected components of WEEE	
Component	Specified Treatment
Cathode ray tubes	The fluorescent coating shall be removed
Gas discharge lamps	The mercury shall be removed
Equipment containing gases that are ozone depleting or have a global warming potential (GWP) above 15 such as those contained in foams and refrigeration circuits	The gases must be properly extracted and properly treated. Ozone depleting gases must be treated in accordance with Regulation (EC) No 1005/2009.

Schedule 2 – Waste types

Table S2.1 Permitted waste types and quantities for material recycling facility	
Maximum quantity	The total quantity of waste accepted at the site shall be less than 41,000 tonnes a year.
Exclusions	Wastes having any of the following characteristics shall not be accepted: Consisting solely or mainly of dusts, powders or loose fibres.
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 03	plant-tissue waste
02 01 04	waste plastics (except packaging)
02 01 07	wastes from forestry
03	Wastes from wood processing and the production of panels and furniture, pulp, paper and cardboard
03 01	wastes from wood processing and the production of panels and furniture
03 01 01	waste bark and cork
03 03	wastes from pulp, paper and cardboard production and processing
03 03 01	waste bark and wood
03 03 08	wastes from sorting of paper and cardboard destined for recycling
04	Wastes from the leather, fur and textile industries
04 02	wastes from the textile industry
04 02 09	wastes from composite materials (impregnated textile, elastomer, plastomer)
04 02 21	wastes from unprocessed textile fibres
04 02 22	wastes from processed textile fibres
10	Wastes from thermal processes
10 11	wastes from manufacture of glass and glass products
10 11 03	waste glass-based fibrous materials
10 11 10	waste preparation mixture before thermal processing, other than those mentioned in 10 11 09
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
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 05	composite packaging
15 01 06	mixed packaging
15 01 07	glass packaging
15 01 09	textile packaging

Table S2.1 Permitted waste types and quantities for material recycling facility	
Maximum quantity	The total quantity of waste accepted at the site shall be less than 41,000 tonnes a year.
Exclusions	Wastes having any of the following characteristics shall not be accepted: Consisting solely or mainly of dusts, powders or loose fibres.
Waste code	Description
16	Wastes not otherwise specified in the list
16 01	end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 03	end-of-life tyres
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 19	plastic
16 01 20	glass
16 01 22	components not otherwise specified
17	Construction and demolition wastes (including excavated soil from contaminated sites)
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	wood, glass and plastic
17 02 01	wood
17 02 02	glass
17 02 03	plastic
17 04	metals (including their alloys)
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron and steel
17 04 06	tin
17 04 07	mixed metals
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03
17 06	insulation materials and asbestos-containing construction materials
17 06 05*	construction materials containing asbestos

Table S2.1 Permitted waste types and quantities for material recycling facility	
Maximum quantity	The total quantity of waste accepted at the site shall be less than 41,000 tonnes a year.
Exclusions	Wastes having any of the following characteristics shall not be accepted: Consisting solely or mainly of dusts, powders or loose fibres.
Waste code	Description
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 01	paper and cardboard
19 12 02	ferrous metal
19 12 03	non-ferrous metal
19 12 04	plastic and rubber
19 12 05	glass
19 12 07	wood other than that mentioned in 19 12 06
19 12 08	textiles
19 12 09	minerals (for example sand, stones)
19 12 10	combustible waste (refuse derived fuel)
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
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 01	paper and cardboard
20 01 02	glass
20 01 10	clothes
20 01 11	textiles
20 01 25	edible oil and fat
20 01 28	paint, inks, adhesives and resins other than those mentioned in 20 01 27
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 01 40	metals
20 02	garden and park wastes (including cemetery waste)
20 02 01	biodegradable waste
20 02 02	soil and stones
20 02 03	other non-biodegradable wastes
20 03	other municipal wastes
20 03 01	mixed municipal waste
20 03 02	waste from markets
20 03 03	street-cleaning residues

Table S2.1 Permitted waste types and quantities for material recycling facility	
Maximum quantity	The total quantity of waste accepted at the site shall be less than 41,000 tonnes a year.
Exclusions	Wastes having any of the following characteristics shall not be accepted: Consisting solely or mainly of dusts, powders or loose fibres.
Waste code	Description
20 03 07	bulky waste

Table S2.2 Permitted waste types and quantities for waste electrical and electronic equipment authorised treatment facility	
Maximum quantity	The total quantity of waste accepted at the site shall be less than 41,000 tonnes a year.
Exclusions	Wastes having any of the following characteristics shall not be accepted: Consisting solely or mainly of dusts, powders or loose fibres.
Waste code	Description
16	Wastes not otherwise specified in the list
16 02	wastes from electrical and electronic equipment
16 02 11*	discarded equipment containing chlorofluorocarbons, HCFC, HFC
16 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 15*	hazardous components removed from discarded equipment
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
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 21*	fluorescent tubes and other mercury-containing waste
20 01 23*	discarded equipment containing chlorofluorocarbons
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35

Schedule 3 – Emissions and monitoring

There are no emission limits or associated monitoring requirements.

Schedule 4 – Reporting

There is no reporting under this schedule.

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 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.

“Annex I” means Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“Annex II” means Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“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.

“building” means a construction that has the objective of providing sheltering cover and minimising emissions of noise, particulate matter, odour and litter.

“controlled substances” means chlorofluorocarbons, other fully halogenated chlorofluorocarbons, halons, carbon tetrachloride, 1,1,1-trichloroethane, methyl bromide, hydrobromofluorocarbons and hydrochlorofluorocarbons listed in Annex I of Regulation (EC) No 2037/2000 of the European Parliament and of the Council of 29 June 2000 on substances that deplete the ozone layer, including their isomers, whether alone or in a mixture, and whether they are virgin, recovered, recycled or reclaimed. This definition shall not cover any controlled substance which is in a manufactured product other than a container used for the transportation or storage of that substance, or insignificant quantities of any controlled substance, originating from inadvertent or coincidental production during a manufacturing process, from unreacted feedstock, or from use as a processing agent which is present in chemical substances as trace impurities, or that is emitted during product manufacture or handling.

“D” means a disposal operation provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“emissions to land” includes emissions to groundwater.

“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.

“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.

“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 III of the Waste Framework Directive.

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

“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, as amended from time to time.

“ozone-depleting substances” “ODS” means “controlled substances” contained in refrigeration, air-conditioning and heat pump equipment, equipment containing solvents, fire protection systems and fire extinguishers.

“pests” means birds, vermin and insects.

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

“R” means a recovery operation provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“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.

“year” means calendar year ending 31 December.

When the following terms appear in the waste code list in Schedule 2, tables S2.1 and S2.2, for those tables they have the meaning given below:

“hazardous substance” means a substance classified as hazardous as a consequence of fulfilling the criteria laid down in parts 2 to 5 of Annex I to Regulation (EC) No 1272/2008.

“heavy metal” means any compound of antimony, arsenic, cadmium, chromium (VI), copper, lead, mercury, nickel, selenium, tellurium, thallium and tin, as well as these materials in metallic form, as far as these are classified as hazardous substances.

“PCBs” means

- polychlorinated biphenyls
- polychlorinated terphenyls
- monomethyl-tetrachlorodiphenyl methane, Monomethyl-dichloro-diphenyl methane, Monomethyldibromo-diphenyl methane
- any mixture containing any of the above mentioned substances in a total of more than 0,005 %by weight.

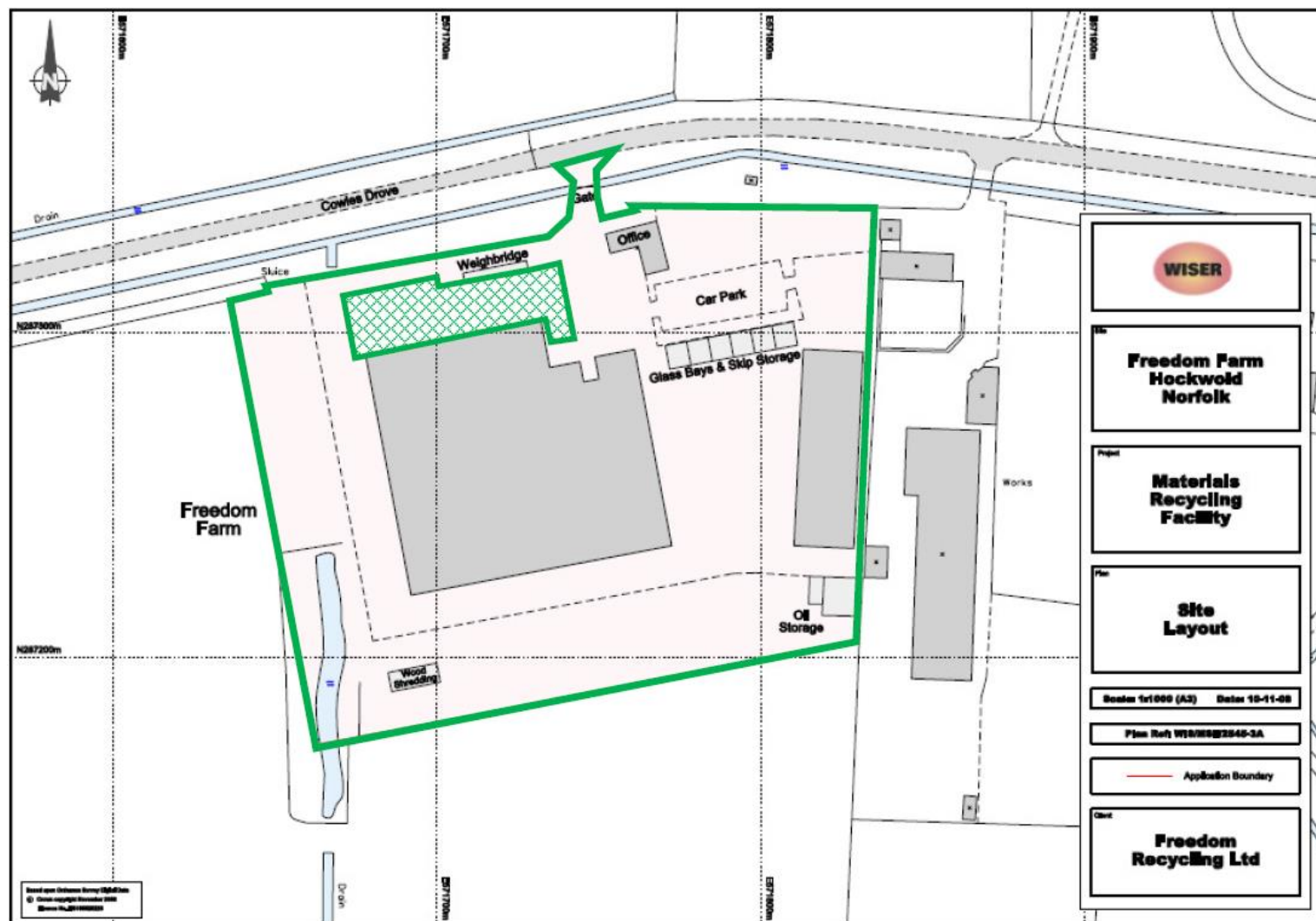
“transition metals” means any of the following metals: any compound of scandium, vanadium, manganese, cobalt, copper, yttrium, niobium, hafnium, tungsten, titanium, chromium, iron, nickel, zinc, zirconium, molybdenum and tantalum, as well as these materials in metallic form, as far as these are classified as hazardous substances.

“stabilisation” means processes which change the hazardousness of the constituents in the waste and transform hazardous waste into non-hazardous waste.

“solidification” means processes which only change the physical state of the waste by using additives without changing the chemical properties of the waste.

“partly stabilised wastes” means wastes containing, after the stabilisation process, hazardous constituents which have not been changed completely into non-hazardous constituents and could be released into the environment in the short, middle or long term.

Schedule 7 – Site plan



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END OF PERMIT

Transfer application number
EPR/KP3796NE/V004