

Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP
06/07/2017

Letter of Confidentiality: Permit Pre-Application Reference No. PPN-00124

Dear Sirs,

Further to our Pre-Application Meeting with your Senior Environment Officer Adam Ward, and our subsequent Standard Rules Permit Application at Berth 31 Barry Docks, we request that our Fire Prevention and Management Plan is treated as commercially confidential for the purposes of the Freedom of Information Regulations.

The Company has invested significant resources in the development of the Fire Prevention and Management Plan and considers this Intellectual Property to be unique to our organisation and of commercial value to our competitors. As such we believe our competitive position would be adversely affected, and the Company disadvantaged economically, should this document be released into the public domain.

The release would also damage our business owing to the detail included regarding the technical aspects of the process, which are integral to the operation of the plan and have commercial and contractual implications.

The Company has invested a considerable financial outlay in the design, software, hardware, manpower and consultancy to develop our solutions. There is also a considerable outlay in constructing the infrastructure of the site, which is bespoke to our Company.

We have written the plan to ensure that the requirements for FPMP 2016 are met where possible. However, we have also developed bespoke solutions to some of the principles of these documents. The layout of the storage arrangements along with the monitoring that we will be undertaking is bespoke to our company. This is not detailed in the EA guidance. Our Isothermic Research, Fire Spread report and monitoring innovations are our own Intellectual Property that have been a cost to ourselves but would be of significant value to our competitors.

The release of our plan would give our current and future competitors a free blue print on how to set up and operate wood recycling operations without having to make the financial outlay that we have already invested.

Please confirm receipt and your acceptance of this request.

Yours Faithfully,



R J Scott-Worthington