



1. Introduction

This procedure describes the mechanism for 'permit' management (applying, operating and surrendering) across the UK and Ireland. The objective of the procedure is to ensure that permitting activities are conducted in a systematic and consistent way thereby addressing the Company's legal and other obligations, as well as satisfying business needs.

2. Scope

This procedure applies to the following types of permit, consent and authorisation.

- An Environmental Permit (formerly PPC permit or Waste Management Licence or Discharge Consent to controlled waters and groundwater or Radioactive Substances Authorisation) issued by the Regulator or the Local Authority.
- An exemption certificate issued in relation to activities which are exempt from the permitting requirements of the Environmental Permitting Regulations.
- A Trade Effluent Consent issued by the relevant Sewerage Undertaker (for discharge of waste water into a foul sewer).
- A Water Abstraction Licence.
- An Animal By-Product Regulations Authorisation.
- Natural England - European Protected Species Mitigation Licences.
- Scrap Metal Licence

This procedure does not deal with planning consents (which are handled by the Estates department), work permits (visas), permits-to-work (safety systems) or any other type of permit.

3. References

- 3.1 Environmental Permitting Regulations 2007/2010/2013/2014/2016*
- 3.2 Pollution Prevention and Control (Scotland) Regulations 2000/2012.*
- 3.3 Water Industry Act 1991 and 1999.
- 3.4 Water Act 2014.
- 3.5 Water Resources Act 1991.
- 3.6 Radioactive Substances Act 1993.
- 3.7 Animal By-Products (Enforcement) (England) Regulations 2011 and similar enforcement regulations that apply in Scotland and Wales.*
- 3.8 Waste Management Licensing (Scotland) Regulations 2011.
- 3.9 SYS/2/038 Viewing Regulatory Documents on Salesforce.
- 3.10 Wildlife and Countryside Act 1981.*
- 3.11 Environmental Protection Act 1990

4. Definitions

Animal By-Product	Means entire bodies or parts of animals, products of animal origin or other products obtained from animals, which are not intended for human consumption.
Animal By-Product Authorisation	Allows the operation specified to transport and dispose of animal by-products and catering waste in a manner specified. An example would be to allow the landfilling under international law of kitchen or household catering waste.



Catering Waste		Means all waste food (including used cooking oil) originating in restaurants, catering facilities and kitchens, including central kitchens and household kitchens.
Discharge Consent /Trade Effluent Agreement		Required for the discharge of any trade effluent to foul sewer.
Environmental Permit		Required for all activities undertaken that appear in Part 2 of Schedule 1 of the Environmental Permitting Regulations (subject to relevant qualifying criteria specified in those Regulations).
Exemption		Required for all activities undertaken that are listed in Schedule 3 of the Environmental Permitting Regulations (subject to relevant qualifying criteria specified in those Regulations).
International Waste	Catering	Means catering waste originating from means of transport (e.g. planes, trains and ships) operating internationally (i.e. outside of the European Union).
Permit Application		<p>Means an application for a new or changes to an existing permit/consent/authorisation. An application can be of the following types:</p> <p>New - for the introduction of a new activity which requires a permit/consent/authorisation, where one does not already exist.</p> <p>Variation – to change/remove/introduce conditions in an existing permit, in relation to the introduction of new activities or changed operating techniques.</p> <p>Surrender – to relinquish the permit by meeting a set of surrender conditions to the satisfaction of the competent authority.</p> <p>Transfer – to change the legal owner of the permit.</p> <p>Consolidation – to take two or more existing permits and join them within a single permit envelope.</p>
Naturally Radioactive (NORM)	Occurring Material	consist of materials, usually <u>industrial wastes</u> or by-products enriched with <u>radioactive elements</u> found in the environment, such as <u>uranium</u> , <u>thorium</u> and <u>potassium</u> and any of their decay products, such as <u>radium</u> and <u>radon</u> . These natural <u>radioactive elements</u> are present in very low concentrations in earth's crust and are brought to the surface through human activities such as <u>oil and gas exploration</u> or <u>mining</u>
Radioactive Waste		Material which, if it was not radioactive, would otherwise be waste.
Regulator		Environment Agency (EA) in England, Scottish Environmental Protection Agency (SEPA) in Scotland, Natural Resources Wales (NRW) in Wales and Northern Ireland Environment Agency (NIEA) in Northern Ireland, Environment Protection Agency (EPA) in Ireland.



Trade Effluent	Any liquid waste 'produced in the course of any trade or industry' which is discharged to the waste water system. This includes water used in production, washing or cooling facilities, collected contaminated surface water.
Water Abstraction Licence	Allows the owner to take a specified quantity of water from a source of supply (such as rivers/streams or groundwater), and describes how much water can be abstracted and how the water will be used.
The Manager	Where used within this procedure refers to the manager with direct responsibility for the Site/Contract/Location/ Department/Portfolio of sites regardless of actual job title.

5. Procedure

5.1 Each Manager is responsible for understanding the requirements of their Permit, ensuring that it is managed by trained and competent staff for each role undertaken and for compliance with their specific Permit.

The Permitting Manager will liaise closely with Site Management in relation to permitting issues, developments and requirements.

The Permitting Managers generally provide support in the following business areas:

Delphine Canning	–	Technical expert for combustion activities (ERF/Energy)
Mat Rooke	–	South Region and Ireland and technical expert for biological activities
Dave Jebb	–	Central Region and technical expert for landfill activities
Andy Nash	–	North Region & Scotland and technical expert for hazardous and industrial activities
Philip Cockerton	-	Supporting Permit managers

Other support functions, such as the Environment Team and Technical support, will work closely with the Business Unit Site Management and the Permitting Managers to assist operations in achieving compliance with permit requirements.

5.2 Whenever a requirement for permitting work arises within the business, the Permitting Manager will oversee its delivery. The wider Business must make the relevant Permitting Manager aware of the requirement, for example, applications for new permits, permit variations, permit surrenders, permit transfers etc. along with details of the circumstances giving rise to the requirement.

5.3 The Permitting Manager must be involved at the planning and strategic stage of projects to ensure that any permitting requirements and implications are known and understood at an early stage to enable the permitting process to be as efficient and effective as possible.

5.4 All documentation/records relating to permitting work must be kept by the relevant Permitting Manager at a specified and readily accessible location and in a readily retrievable format. Copies may also be made and held locally where needed. Routine documentation/records as required by the Permit (e.g. monitoring



results) must be kept by the business to which they relate in a specified, easily accessible location and in a readily retrievable format.

5.5 The majority of permits, discharge consents and other authorisations issued by the Regulator are now sent out in electronic format. The original documents are held in the property section of Salesforce.com (SYS/02/038 explains how to access them). Any documents issued in paper format will be scanned and uploaded to Salesforce. Where there is a need to retain original paper format documents, arrangements will be made by the Company Environment Manager to place them into secure archive storage.

5.6 The Permitting Managers will maintain a database system of 'Permitting Activity' to create visibility and tracking of permit movements and will periodically share the information with the Environment Agency NPS, as a tool to aid discussions between Veolia and the Agency on current and forthcoming permitting work.

5.7 A permit review process (Permit Checklist) will take place on an annual basis using Ava. It is the responsibility of the Permit Owner to ensure that the review is conducted promptly and effectively. Note, it will not be considered appropriate to tick boxes unless there is sufficient information contained within the notes boxes. Actions arising from the review will require the completer to raise a task, which must be dealt with as other Ava related tasks.

5.8 Completed permit checklists will be subject to review:

- Following closure of the checklist completion window (31st December), Permitting Managers will select a sample of submissions at a rate of four per Manager per year and in conjunction with the permit owner, undertake a thorough review of the submission. A review function is available in Ava for permit managers to go back into the completed checklist and make additional comments or change 'YES' answers to 'NO' if non-compliance with relevant permit conditions is known. Any further actions identified during the review must be raised as additional tasks in Ava..

Significant issues identified must be escalated to the Head of Risk who will include these issues in reports for consideration by the Corporate Risk Committee.

5.10 The Manager is responsible for ensuring that a Permit Master Records form is maintained locally. The Master Records form is to identify all records pertinent to ensuring compliance with the Permit including, for example, the permit application, correspondence with the Regulator relating to the application, documents referenced within the Permit, agreements made with the Regulator etc. In addition, the Manager should maintain a file arranged in chronological order of all correspondence with the Regulator in relation to the permit.

5.11 In the event of a prosecution, a Post Convictions Plans (PCP) will be developed by the Company Environment Manager. The PCP will be submitted to the Regulator by the Company Environment Manager and ensure that the Group prosecutions and enforcements record held by the legal department is amended accordingly.

6. Variation

None.



7. Documentation

Reference No	Title	Minimum Retention Period
SYS/2/017/001	Processing Flowchart	N/A
SYS/2/017/002	Permit Master Records	Duration of Permit Validity