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7th February 2025

PADESWOOD EPR PERMIT BL1096 CCS PROJECT – COMMERCIAL AND INDUSTRIAL CONFIDENTIAL INFORMATION (“CIC”)

Dear NRW,

REQUEST

This letter is a formal request to kindly exclude certain information contained within the application for an environmental permit variation submitted by Castle Cement Limited (trading as Heidelberg Materials UK Cement) (“**HMUK**”) to operate carbon capture at the Padeswood Cement Plant from the public register on the grounds that it is commercial and industrial confidential (“CIC”) information.

This request covers CIC information provided by Mitsubishi Heavy Industries Engineering, Ltd (“**MHI**”) to MHUK. Please treat this letter as a formal notice in accordance with section 48(1)(b) of The Environmental Permitting (England and Wales) Regulations 2016. We also kindly request that the same CIC information be treated as exempt from disclosure under the Environmental Information Regulations 2004 (“**EIR**”).

KS-21 solvent

This CIC request relates to KS-21, an amine solvent developed by MHI, and which is proposed for use in the Project. KS-21 has the potential for higher capture rates, lower energy consumption, lower solvent degradation, lower amine emissions to air, and less equipment corrosion (thereby increasing carbon capture plant

Hanson Quarry Products Europe Limited (registered no. 300002), Hanson Packed Products Limited (026306), Hanson Aggregates Marine Limited (485700), Hanson Marine Limited (545217), Castle Cement Limited (2182762), Civil and Marine Limited (2301423), Midland Quarry Products Limited (3173418), and Irvine-Whitlock Limited (870262) are incorporated in England and Wales with registered office, Second Floor, Arena Court, Crown Lane, Maidenhead, Berkshire, SL6 8QZ and are members of the group headed by Heidelberg Materials AG.

lifespan) compared to similar non-proprietary conventional solvent used for carbon capture.

The composition of amines within KS-21 is a valuable trade secret of MHI. CIC amine-related information has been supplied to MHUK by MHI under terms of strict confidentiality, enabling MHUK to meet its regulatory requirements, including with respect to environmental permitting.

Public disclosure of the composition of KS-21 would cause substantial harm to the legitimate commercial interests of MHI as third parties would be free to develop their own version of the solvent and, without needing to have made the same investment as made by MHI in terms of the time and costs of research and development, would gain an unfair commercial advantage over MHI. Public disclosure of this information could stifle future innovation and associated investment in carbon capture and storage in the UK.

CIC information

The specific CIC information to which our request relates comprises the documents [that have been supplied to you and are] entitled 'Table1(HMUK).pdf', 'Table2(HMUK).pdf', SDS (HMUK).pdf and 'KS21-Compostion.pdf'. Although there is other CIC information contained in the application, we have confined this notice to the absolute minimum information necessary to safeguard the legitimate commercial interests of MHI, and specifically to protect the composition of KS-21. This CIC information covered by this request does not relate directly to emissions from the plant and its exclusion would not prevent public understanding and participation in the permitting process given the extensive amine-related emissions information provided in the variation application and which we have not asked to be excluded from the public register. We understand and accept that information relating to emissions, including the identity of amines and other

substances emitted to air cannot be covered by a CIC request, and no such information is covered by this request.


Third-party requests for information

We also kindly request that for the purposes of any third-party request for information submitted to NRW under the EIR that the information covered by this request be treated as CIC exempt from disclosure pursuant to regulation 12(5)(e) of the EIR. In the event of any relevant third-party request, we would be grateful if you could consult HMUK and MHI in advance of any disclosure.

If you wish to discuss this letter please contact, myself or MHI directly Takashi Kamijo (takashi.kamijo.yt@mhi.com). Alternatively, you may contact Hogan Lovells who are lawyers acting for MHI on this matter (kevin.oconnor@hoganlovells.com).

We are grateful for your consideration of our CIC request and this letter.

Yours sincerely



Iain Walpole
Head of Process and Sustainability CCUS

Cc MHI