

Permitting Service  
Natural Resources Wales  
Crown Buildings  
Cathays Park  
Cardiff  
CF10 3NQ

*By e-mail*

9<sup>th</sup> September 2025

Our Ref: 023-1944 WEPA - PAN-026789 Schedule 5 Response REV00

Dear Dr. Wallace,

### **WEPA UK Ltd – PAN-026789 (EPR/EP3738NG/V006) Schedule 5 Response**

Many thanks for your Schedule 5 dated 22<sup>nd</sup> August 2025 (Ref. PAN-026789 Schedule 5 Notice). Our responses to the various questions and requests are outlined below.

*NRW Question 1: Clarify if the wastes referenced in the application to be accepted on site will consist of recycled fibre other than broke.*

As previously stated, WEPA would like to include the following LoW Codes within the permit (as listed in the provided FPMP).

**Table 1-1: Specified materials**

List of Waste Code	Description
03 03 08	wastes from sorting of paper and cardboard destined for recycling
15 01 01	paper and cardboard packaging
19 12 01	paper and cardboard
20 01 01	paper and cardboard

At the current time, broke arrives on-site using delivery notes quoting LoW Code 20-01-01. The additional requested LoW Codes won't be classified as broke (which the NRW has identified as a by-product, *i.e.* originating from other paper producing sites). WEPA is not requesting that the materials be assessed or classified as broke. Broke will only come onto the site using LoW Code 20-01-01 from certain specific sources and suppliers (*i.e.* from other paper producing sites).

In the future, if market conditions require it, other materials might be sourced on the open market from non-paper-producing sources (using the stated LoW Codes). We don't expect the risk profile of the 'other materials' to be materially different from the incoming broke, after all, the site is still producing high-quality consumer-facing paper products. What we want to avoid is permitting delays if alternative sources (non-broke sources) are required to maintain production volumes.

*NRW Question 2: Outline the ratios between virgin pulp and recycled fibre*

Within this variation, WEPA is not changing either the individual processes or the product limits; hence, no change to the current BAT-AELs is required as part of this variation. WEPA appreciates that any future variations (that change the wood-based virgin fibre to recycled fibre ratio) will require further assessment.

Currently, WEPA is at 15% recycled input. Project Vesta will allow the site to achieve up to 30% (this variation application is under preparation). Greater than 30% and up to 60% will require further investment (and the possibility of a de-ink plant). This would be subject to a further variation application. 60% recycled input is WEPA's aspiration, but it is subject to material availability and quality requirements.

We can confirm that Project Vesta has nothing to do with this variation, *i.e.* it will be subject to a separate variation application.

All WEPA wants at this stage is an option to source material that WEPA can process onsite (using the current processes and equipment), rather than cutting down more trees. Everything that arrives on-site will be consumed in the process.

I trust that the above is satisfactory, but if you have any queries on this matter, please do not hesitate to contact me.

Yours sincerely,



**Michael Sylvester**

EAME Manager