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Christopher Betteridge
Natural Resources Wales
Welsh Government Offices
Cathays Park
King Edward VII Avenue
Cardiff
CF10 3NQ

4th November 2025

Our Ref: SOL_24_P061_RYM

Dear Christopher,

RE: THE ROYAL MINT LTD – PAN-028118

Further to your email dated 15th October 2025, please find below a response to each of your questions in turn.

Application Form C2, Part 3d

1. *You have claimed that the operator has ISO 14001 certification, please could you provide a copy of the certificate as evidence.*

Please refer to Annex A of this letter for a copy of the ISO 14001:2015 certification for The Royal Mint Ltd.

Best Available Techniques

2. *Please could you provide a copy of waste acceptance procedure EWP 4.5.4 – Waste Receipt Procedure. Please could you also provide a copy of the waste pre-acceptance procedure.*
   Please could you provide details regarding the waste storage procedures and capacities, showing separation/segregation for potentially incompatible wastes.

The Waste Acceptance Procedure, EWP 4.5.4 – Waste Receipt Procedure, has been superseded and replaced with EWP 8.1 WEEE Waste Acceptance Procedure. The sites waste pre-acceptance procedure is provided in Annex B, Front-End Process Flow (pre-acceptance and acceptance) document. Please refer to Annex B for all procedures in relation to waste management on site. This includes the following:

- EMP 4.5 Waste Management;
- EMP 4.5.3 Waste Management Responsibilities;
- EWP 4.5.2 Waste Consignment Notes;

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- EWP 4.5.2 Waste Transfer Notes;
- EWP 4.5.3 Hazardous Waste Consignment Notes;
- Front-End Process Flow (pre acceptance and acceptance);
- EWP 8.1 WEEE Waste Acceptance Procedure; and
- EWP 8.1.1 Waste Pre Acceptance Procedure.

The permit variation is to increase capacity on site to receive and process additional WEEE materials. Royal Mint propose to increase capacity to 20,000 tonnes per annum. The Waste Storage Procedure is detailed within EMP 4.5 Waste Management document provided in Annex B – Waste Procedures. As detailed within section 7.5 of this document, all waste shall be segregated and stored within their designated area or containers. All waste will be stored in an appropriate manner to prevent escape and the container will be kept in good repair and worn/damaged/corroded containers will not be utilised on site. All waste containers on site will be clearly identified and marked/labelled. All waste will be stored in 1m³ units, with each waste pile comprising a maximum of 300 individual units (300m³) per building. The majority of these 300m³ waste piles will be located in separate metal buildings. Each unit of waste will be a pallet / box or flexible IBC.

The Fire Prevention Plan provides further details in relation to waste separation/segregation for potentially incompatible wastes.

Application Form C2, Part 6

3. *Please could you include all the Local Wildlife Sites and Ancient Woodlands within 2km of the site in your Annex B Environmental Risk Assessment and Annex D Air Quality Assessment.*

Please refer to Annex C – Updated Environmental Risk Assessment of this letter for an updated Environmental Risk Assessment which identifies all sensitive receptors within the vicinity of the site.

Please refer to Annex D – Updated Air Quality Assessment of this letter for an updated Air Quality Assessment and associated modelling files which considers the Local Wildlife Sites and Ancient Woodlands within a 2km radius of site.

There are numerous LWS and AW within 2km of the Site, however, given the low emissions and as agreed with NRW (email 23/10/25), a screening assessment for these is provided rather than a detailed assessment for each. For the screening assessment, predicted impacts are assessed for the maximum predicted concentration anywhere within the model domain which occurs at the northeast boundary of the site. Impacts are assessed for both moorland and woodland habitats assuming moorland habitats comprise acid grassland and woodland habitats comprise broadleaved deciduous or coniferous woodland. Please refer to Annex D – Updated Air Quality Assessment for more information.

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Fire Prevention and Mitigation Plan (FPMP)

4. *Please could you update your FPMP, addressing the following in accordance with the NRW Guidance Note 16 Fire Prevention & Mitigation Plan Guidance – Waste Management:*
    - *State the amount of waste to be received per day.*
    - *Details of the total amount of waste, the types and forms it will be stored in on site and how it will be stored.*
    - *The minimum separation distance of 6m is insufficient according to the guidance. Please could you address this in your updates, ensuring minimum separation distances are respected.*
    - *Please could you ensure your designated quarantine area meets what is stipulated in the guidance Note 16, section 22 regarding quarantine areas.*
    - *Please could you outline the potential combustion products and emissions (to air, land and water) including impact on the local community, critical infrastructure and environment.*
    - *Please could you list the sensitive receptors within 1 km of the site.*
    - *Please could you highlight on a map or layout where hazardous materials are stored. The report makes reference to them being more than 20m from storage areas only.*
    - *The calculation of volume of firewater required to fight a fire for 3 hours is 360,000 litres, or 360 m3. However, the firewater holding capacity is for 160m3 only. This is of particular concern given the presence of a nearby river, which is also a local wildlife site. This volume of storage is insufficient, please could you describe and explain your emergency response and management procedures for dealing with 360m3 of firewater.*

Please refer to Annex E – Updated Fire Prevention Plan of this letter for an updated version of the Fire Prevention Plan which addresses all the points raised above. In summary:

- The amount of waste received per day will fluctuate depending on operational requirements. Full details are provided in section 4 of the FPP. The FPP is only applicable to the WEEE waste stored on site, and excludes the Printed Circuit Boards (PCB's) due to being non-combustible. The approximate annual tonnage of WEEE waste will be 10,000 tonnes per annum. Therefore, assuming approximately 250 working days per year this equates to approximately 40 tonnes of WEEE waste being received on site per day.
- Section 4 of the FPP provides full details on the storage of waste on site. All waste will be stored in 1m³ units, with each waste pile comprising a maximum of 300 individual units (300m³) per building. The majority of these 300m³ waste piles will be located in separate metal buildings. Each unit of waste will be a pallet / box or flexible IBC.
- Section 6 of the FPP provides full details of the separation distances on site. The 6m separation distance will be applicable on site if more than one waste pile is stored within any one building. Under normal operations, only one waste pile (maximum of 300m3) will be stored within any one building, therefore a 6m separation distance is not applicable.

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- Section 2.4 and 6.3 of the FPP provides full details of the Quarantine Area on site. The quarantine area meets the stipulations detailed within the guidance and can hold at least 50% of the largest waste pile (150m3) and has a separation distance of at least 6m to prevent the accidental spread of a fire.
- The site does not have combustion products on site. NRW have confirmed (email 21/10/25) that no further information was required in relation to combustion on site.
- Section 14 of the FPP provides full details of the sensitive receptors within 1km of the site. Annex E – Updated Fire Prevention Plan includes two additional drawings, a designated ecological receptor drawing with a 2km radius and a sensitive receptor drawing with a 1km radius.
- Annex A – TRM Waste Treatment, Storage Areas and Substance Locations of the FPP shows all waste storage areas on site.
- Section 12 of the FPP provides full details for fire water containment on site. The site is able to contain 610m^3 of fire water in a worst case scenario through building containment and the sealed drainage system with penstock valves.

Dust Management

5. *Please could you describe your dust management techniques in detail.*

The permitted waste types on site are not considered dusty. Incoming waste will not include dusts, powders or loose fibres and all processing on site takes place internally within enclosed buildings. Dust has been screened as low risk within the Environmental Risk Assessment and therefore, further dust mitigation measures have not been considered.

Waste received on site arrives with an additional plastic wrap covering (as seen in Figure 1.1 below), which minimises the risk of dust further; a risk level that is already extremely low.

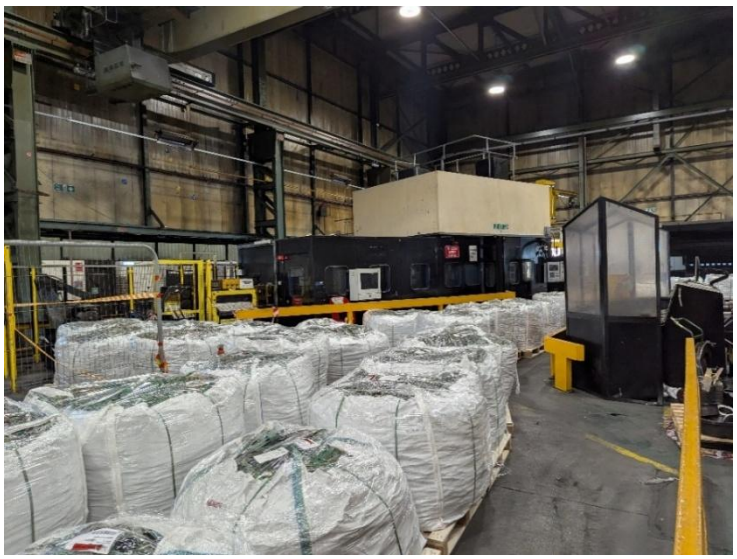

Figure 1.1 Waste Received on Site

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As detailed within the Environmental Risk Assessment the following measures are implemented on site and in accordance with dust management techniques detailed within the guidance:

- The main processing equipment within the MRB Building is extracted via a dedicated dust extraction system. All dusts are returned back to the process to recover any precious metals content.
- Gathered dust from machinery is further recycled where possible and kept internally in lidded dumpy bags prior to disposal where recycling is not possible.
- Good housekeeping practices keep dust / litter to a minimum with sweeping and cleaning of workstations as part of 'end of shift' good practice.

Should you have any further questions in relation to the above please do not hesitate to contact me.

Yours sincerely,

Jessica Easterbrook