

**Natural Resources Wales Permitting Decisions**

**WEPA UK Ltd (Bridgend Paper Mill)**

**Decision Document**

## Application for a Normal Variation

**The application number is: PAN-026789**

**The permit variation number is: EPR/EP3738NG/V006**

**The operator is: WEPA UK Ltd**

**The Installation is located at: Bridgend Paper Mill, Llangynwyd, Bridgend, CF34 9RS**

### Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise, we have accepted the applicant's proposals.

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## **Glossary of acronyms and definitions used in this document**

BAT-Best Available techniques

CPI-Confederation of Paper Industries

ELV-Emission limit value

EPR- Environmental permitting regulation 2016 (as amended)

EWC-European waste codes

FPMP-Fire prevention and mitigation plan

HRA- Habitat regulations assessment

IED-Industrial emissions directive

MCP- Medium combustion plant

MCPD- Medium combustion plant Directive

NOx- Oxides of nitrogen

RCF-Recycled Fibre

SSSI-Site of special scientific interest

WFD-Waste framework directive

# 1. Executive summary

## 1.1. Application summary

WEPA UK limited have applied to vary their permit for Bridgend Paper Mill to make the following changes;

- Two new natural gas boilers that are 9.23 MWth each (18.46 MWth total) to be added in the permit as new medium combustion plants (MCP). These are to replace the existing 38MWth combined heat and power facility. As a result of the decrease of aggregate thermal input at the site from 83.6 MWth to 30.6 MWth, Section 1.1 Part A1 (a) of EPR no longer applies to the site and this activity has been removed from the permit. The drying hood that was part of the S1.1 activity has now been reclassified as a directly associated activity.
- The acceptance and storage of waste paper as a waste activity in the permit. The waste paper is accepted under four European waste codes (EWC) except broke which is classed as a byproduct under the waste framework directive. The waste paper/recycled fibre (RCF) is to be used as a material in the paper process alongside virgin fibre.
- The acceptance and storage externally source broke (partly or fully manufactured paper or board from paper or board making process).

## 1.2. Our decision

We have decided to issue the variation for Bridgend Paper Mill operated by WEPA UK limited.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

# 2. Receipt of the application

The application was received on 03/09/2024. In order for us to be able to consider the application duly made, we needed more information.

1. Email requesting the following information was sent 07/05/2025 with a response given on the 08/05/2025
  - Clarification if the proposed waste imported under the four European waste codes will consist of “broke” or if it will include other recycled fibres materials.
  - Which industry dose the proposed broke and/or waste paper originates from.
  
2. A letter requesting this information was sent to the applicant on 23/05/2025. This was on the following:
  - Additional details on the fire prevention and mitigation plan.
  - Additional details on the air quality impact assessment – nitrogen deposition on local habitats sites.
  - Noise impact assessment – Justification for using background from 2019 and how this is representative of the area.
  - Serial numbers for both of the new boilers.

Upon receipt of this information, on 02/06/2025, we were able to consider the application duly made. This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we would need to complete that determination.

### 3. Confidential information

The applicant made a claim for no claim for commercial confidentiality, and we have not received information in relation to the application that appears to be confidential in relation to any party.

### 4. Legislation

The variation will be issued, under Regulation 20 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an *installation* as described by the IED;

- subject to aspects of the Well-Being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 which also have to be addressed.
- Has a medium combustion plant subject to the Medium Combustion Plant Directive.

We address the legal requirements directly where relevant in the body of this document. NRW is satisfied that the decision on this application is consistent with its general purpose of pursuing the sustainable management of natural resources (SMNR) in relation to Wales and applying the principles of SMNR. In particular, NRW acknowledges that it is a principle of sustainable management to take action to prevent significant damage to ecosystems. We consider that, in issuing the variation a high level of protection will be delivered for the environment and human health through the operation of the Installation in accordance with the permit conditions.

As the EPR regulator for Part A1 installations in Wales, NRW are required to determine any duly made Part A1 permit applications. This means that we must decide either to grant, or to refuse the variation based upon an objective assessment of the proposals against the detailed legal requirements of EPR. Our public participation statement<sup>1</sup> gives more information on what can, and cannot, be taken into account when making our permitting decision.

The application, and this decision document, only considers the permitting of the facility under EPR as described throughout the document. We only assess the installation and its impacts and cannot take into consideration indirect impacts which are not as a direct result of activity within the installation boundary.

Any proposed development and wider associated activities will be required to be compliant with all relevant and applicable law, for example, environmental law, health and safety law, planning law. This other legislation acts largely independently of EPR (although they may be inter-related). Such other matters are beyond both the scope of this document, and of our regulatory remit and expertise and are not relevant to our EPR permitting decision. Ensuring compliance with all other regulation and obtaining

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<sup>1</sup> [Natural Resources Wales / Public participation: how you can take part in our permit and licence consultations](#)

any required consents (such as planning permission) is the responsibility of those undertaking the development and is regulated by the relevant appropriate authority for each.

## 5. Consultation

No consultation has been carried out on this application because the application was deemed a normal variation and consultation is not required for this kind of application. This decision was made in accordance the Environment Permitting Regulations (EPR), our statutory Public Participation Statement<sup>2</sup> and our Regulatory Guidance.

## 6. Requests for information

Several informal information requests were also made via email. These related to an amended site plan showing the location of the emission points to air and water. Further information was requested during determination by way of two Schedule 5 Notices.

The first schedule 5, required the applicant to provide further information relating to;

- Clarification if the wastes referenced in the application to be accepted on site will consist of recycled fibre (RCF) other than broke (including ratios of virgin pulp to RCF)

The first Schedule 5 Notice was sent on 22/08/2025 with a deadline for response of 17/09/2025. The applicant's response to the first Schedule 5 Notice was provided on 09/09/2025. The additional information supplied satisfied the requirements of the first Schedule 5 Notice.

The second Schedule 5, required the applicant to provide further information relating to;

- Revised information on the fire prevention plan including justification on not meeting 6 meter separation distance and additional measures required
- Provide a copy of your waste acceptance procedure

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<sup>2</sup> [Natural Resources Wales / Public participation: how you can take part in our permit and licence consultations](#)

- Confirm the activity under Annex II of the Waste Framework Directive that applies to the proposed activity to store waste paper.
- If the use of waste will cause any change to the risk of noise impact.

The second Schedule 5 Notice was sent on 26/09/2025 with a deadline for response of 24/10/2025.

The applicant's response to the second Schedule 5 Notice was provided on 15/10/2025. The additional information supplied satisfied the requirements of the second Schedule 5 Notice.

A copy of the e-mails requesting further information were placed on our public register as were the responses when received.

## 7. The Installation

### 7.1. The permitted activities

The regulated facility is currently an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations:

- Section 6.1 Part A(1)(b) Producing, in industrial plant, paper and board where the plant has a production capacity of more than 20 tonnes per day. Production of a range of hygienic paper tissue products from virgin wood-pulp and recycled paper from a single paper-machine.
- S5.4 A(1)(a)(i) Biological treatment of more than 50 tonnes per day of process effluent and boiler blow down.
- S1.1 A(1)(a) Burning any fuel in an appliance with a rated thermal input of 50 or more megawatts.

An installation may also comprise "directly associated activities", which at this Installation include includes:

- Treatment of water - Treatment of water abstracted from the River Llynfi and the Nant Gwyn Stream for use in permitted installation.
- Paper conversion-8 paper-conversion lines

### 7.2. Changes to the installation

The variation will make the following changes:

- Addition of 2 x 9.23MWth medium combustion plants and the removal of the existing boiler and section 1.1 Part A1 (a) activity from the permit.
- Drying hood relisted as a directly associated activity (previously captured under S1.1 Part A1 (a) activity)
- Addition of waste paper to be accepted under four European Waste Codes. The storage of waste will fall under the waste recovery activity R13 *Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced).*

As a result the replacement of the old 38 MWth boiler with 2 x 9.23 MWth MCPs, site's total thermal input will drop below the 50MWth and therefore the activity listed under Section 1.1 Part A1(a) of part 2, Schedule 1 of EPR no longer applies to the site. We have therefore removed this activity from the permit.

The existing drying hood which had previously been capture under the section 1.1 activity have now been reclassified as a directly associated activity. The two new boilers will be listed as MCP activities in Table S1.1.

## 8. Operation of the installation

### 8.1. Operator competence

The applicant is the sole operator of the Installation. We are satisfied that the applicant is the person who will have control over the operation of the Installation the variation is issued; and that they will be able to operate the Installation so as to comply with the conditions included in the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator<sup>3</sup>.

### 8.2. Environmental Management System

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<sup>3</sup> [RGN 1 Understanding the meaning of 'operator' \(naturalresources.wales\)](#)

The applicant has stated in the application that they will implement an Environmental Management System (EMS) that will meet the requirements for an EMS in our “How to comply with your environmental permit” guidance<sup>4</sup>.

The applicant has submitted a summary of the EMS (accredited to ISO14001) with their application including a list amendments and additional documents that are to be integrated into the EMS as a result of the variation.

We have reviewed the application and are satisfied that appropriate management systems and management structures will be in place for this Installation, and that sufficient resources are available to the Operator to ensure compliance with all the Permit conditions.

### Accident management

The EMS includes an Accident Management Plan which the applicant has submitted as part of this application. We have reviewed this and are satisfied that appropriate controls are in place to help reduce the occurrence and impact of any accident that occur.

In order to ensure that the management system proposed by the applicant sufficiently manages the residual risk of accidents, permit condition 1.1.1 a requires the implementation of a written management system which addresses the pollution risks associated with, amongst other things, accidents.

### Fire Prevention and Mitigation

The facility will be operated in accordance with an approved Fire Prevention and Mitigation Plan which has been submitted as part of this application and carried out in line with the guidance which as a activity that is carried out on installation which has a paper manufacturing as its primary activity is the Confederation of paper industries (CPI) fire prevention plan<sup>5</sup>. We have reviewed this and are satisfied that appropriate controls are in place to help reduce the occurrence of fires and impact should one occur.

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<sup>4</sup> [Natural Resources Wales / Guidance to help you comply with your environmental permit](#)

<sup>5</sup> [CPI Fire Prevention Plan.pdf](#)

Initially the operator would not have been able to meet the 6 meter separation distance between piles of waste as outlined in guidance. However, as part of a schedule 5 response, the Operator revised their site layout, moving the location of where materials are to be stored to comply with the required separation distance.

### 8.3. Operating techniques

#### Installation activities and assessment of Best Available Techniques

The applicant has described the proposed equipment and operating techniques and compared these against the relevant Best Available Techniques conclusions (BATc) which for an installation of this type is pulp, paper and board 26 September 2014.

The use of externally sourced broke will be the same as broke produced on site. The use of waste paper/recycled fibre will be used to substitute virgin pulp and will represent 15% of the input. Given the percentage, the existing permit's BAT-AELs are still applicable to the site. Any increase in the use of recycled fibre (30% or above) will be done in another permit variation.

We have reviewed the techniques proposed and consider them in line with BAT at this installation.

We have specified that the applicant must operate the permit in accordance with descriptions in the application. See Section 12.2 of this document for more information on how we have incorporated the application/variation into the permit and how emission limit values have been set.

The use of the MCPs will comply with the relevant MCP permit conditions and the MCP operating techniques have been incorporated into the permit (Table S1.2A).

### Efficient use of raw materials, water and energy

Having considered the information submitted in the application, we are satisfied that the applicant will ensure that raw materials, water and energy is used as efficiently as possible.

### Avoidance, recovery or disposal of wastes produced by the activities

Having considered the information submitted in the application, we are satisfied that the waste hierarchy referred to in Article 4 of the WFD will be applied to the generation of waste and that any waste generated will be treated in accordance with this Article.

We are satisfied that waste from the Installation that cannot be recovered will be disposed of offsite using a method that minimises any impact on the environment. Permit condition 1.4.1 of the permit will ensure that this position is maintained.

## 9. The site

### 9.1. Site Plan

There are no changes to the site boundary as a result of the variation.

The applicant has provided an updated plan which we consider is satisfactory, showing the extent of the site of the facility and with the existing and new emission points. The updated plan will be included in the permit and the operator will be required to carry on the permitted activities within the site boundary.

## 10. Environmental Risk Assessment

Regulated activities can present different types of risk to the environment, these include odour, noise and vibration; accidents, fugitive emissions to air and water; as well as point source releases to air, water, sewer and discharges to ground or groundwater, global warming potential and generation of waste. All these factors have been considered during the determination and the relevant risks from this proposal are discussed in this and other sections of this document.

The next sections of this document explain how we have approached the critical issue of assessing the likely impact of emissions from the Installation on human health and

the environment and what measures we are requiring ensuring a high level of protection.

In line with our guidance, the applicant has provided an environmental risk assessment with the application which identifies and the sources of key risks from the installation / variation, possible pathways and receptors. This risk assessment and further assessments provided by the applicant and/or completed by NRW will be discussed in further detail below.

### **10.1. Assessment of impact on air quality**

This section of the decision document deals primarily with the dispersion modelling of emissions to air from the stack and its impact on local air quality.

The applicant has assessed the Installation's potential emissions to air against the relevant air quality standards, and the potential impact upon human health in line with relevant guidance<sup>6</sup>. These assessments predict the potential effects on local air quality from the Installation's stack emission. The air emission modelling and report assumes that both boilers will be continuously emitting throughout the whole year at full load.

The air impact assessments, and the dispersion modelling has been based on the Installation operating continuously at the relevant long-term or short-term emission limit values, i.e., the maximum permitted emission rate

The applicant has calculated process contributions (PC) and predicted environmental concentrations (PEC) at locations within the immediate vicinity and all identified sensitive receptor locations. The modelling results for each pollutant will be discussed separately below.

Emissions of oxides of nitrogen (NO<sub>x</sub>, assessed NO<sub>2</sub>) was assessed against a long-term critical level of 40 µg/m<sup>3</sup> (annual) and short term critical level of 200 µg/m<sup>3</sup> (hourly).

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<sup>6</sup> [Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit)

The worst case long term process contribution at the nearby receptors was  $0.3 \mu\text{g}/\text{m}^3$  which is 0.8% of the critical level of  $40 \mu\text{g}/\text{m}^3$ . As this is less than 1% of the critical level the emission screens out as insignificant.

The worst case short term process contribution at the nearby receptors was  $2.8 \mu\text{g}/\text{m}^3$  which is 1.4% of the short term critical level. As this is less than 10% of the short term critical level, the emissions screen out as insignificant.

As at sensitive receptor locations the maximum predicted long-term PC was <1 % and the short-term PC was <10 % of the short-term critical level, in accordance with the relevant guidance the long term and short-term impacts from NO<sub>x</sub> can be considered insignificant.

### Emission limits

We have decided that emission limits should be set for the parameters listed in the permit.

We have set the limits for NO<sub>x</sub> for the two boilers in line with the medium combustion plant directive (MCPD) requirements for new MCPs that are fired on natural gas.

Based upon the information in the application and the measures that will be imposed by the permit we are satisfied that the appropriate measures will be in place to protect air quality for the environment and human health.

## 10.2. Assessment of impact to surface and ground water

The site has an existing direct discharge to surface water, however the variation will not result in any change to the discharge to surface water and there will be no change to the discharge limits and monitoring requirements in the permit.

## 10.3. Fugitive emissions

The applicant has identified the following potential fugitive emissions in their environmental risk assessment:

- Impact from fire as a result of combustion of waste paper and broke stored on site.
- Storage vessels associated with the 2 x MCPs

The application details measures which will be in place for preventing and minimising fugitive emissions. The operator has a fire prevention and mitigation plan that outlines the procedure for handling fire

The new boilers will have storage vessels for substances associated with the boilers (including a tank for boiler blowdown and dosing substances (caustic soda tank, sodium hydrogen sulphite and other boiler water treatment chemicals)). The tanks will be located within a bunded area which will act as suitable secondary containment (with 110% capacity).

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise fugitive emissions and to prevent pollution from fugitive emissions.

Permit condition 3.2.1 requires that emissions of substances not controlled by emission limits (i.e., fugitive emissions) shall not cause pollution. Condition 3.2.2 requires that a management plan shall be developed if pollution is subsequently identified.

#### **10.4. Assessment of odour impact**

The activities being varied are unlikely to cause any changes to that would increase the risk of odour emissions. The waste paper and broke being received on site is similar to what is currently generated and stored. The operator has a waste acceptance criteria to reject non-conforming waste. The operator has actions to be undertaken in the unlikely event that odour emissions occur. Based on the operator's risk assessment and their management plans, the variation is unlikely to pose any increase in risk of odour.

#### **10.5. Noise and vibration assessment**

There are sensitive receptors within the vicinity of the installation, with the nearest noise located 160 meters north of the site.

The applicant has identified the following sources of noise in their environmental risk assessment:

- Noise from the new 2 x 9.23 MWth natural gas fired boilers

The operator had submitted a noise impact assessment of the operation of the two new boilers on the nearby sensitive receptors. The noise impact was assessed alone and in combination with the whole plant (as required). The applicant had used background from 2020 noise report but had provided justification that the background remained representative.

The risk of change in noise from the use of externally source broke and waste paper was not assessed but was considered low risk for the following reason;

- The externally sourced broke and waste paper is substituting the use of virgin pulp and would not result in an increase in production. The operator had confirmed that substituting virgin pulp with waste and broke will not result in any changes to lorries deliveries (and therefore will not increase noise from delivery lorries).

We are satisfied that given the that the new boilers are replacing an existing CHP activity and the acceptance of waste and broke is similar to what is already carried out on site, the overall risk of increase risk of noise impact is low.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where not practicable to minimise the effects of noise.

Conditions 3.4.1 of the permit requires noise from the activities to be below that which could cause pollution outside the site. We are satisfied that this will be sufficiently protective in conjunction with the measures described by the applicant for minimising noise at the installation.

## **11. Impact on National Site Network Sites, SSSIs and non-statutory sites**

The applicant has used the relevant screening distance criteria to identify relevant protected conservation sites which could be at risk from the proposal.

The applicant had screened to 10 km for national network sites and 2 km for SSSI. We are in agreement that the screening distances used are conservative, however the only impact pathways to national network is through air emissions from the MCPS which for gas boilers of this scale and fuel only have a screening distance of 5 km.

A full assessment of the variation application and its potential to affect the identified sites identified has been carried out as part of the permit determination process. National Site Network sites, Sites of Special Scientific Interest (SSSI) and non-statutory conservation sites will be discussed separately below.

### **11.1. The National Site Network**

The following National Site Network sites are located within 10 km of the installation:

- Glaswelltiroedd Cefn (UK0030113) (Special Area of Conservation)
- Blackmill Woodland (UK0030090) (Special Area of Conservation)
- Kenfig / Cynffig (UK0012566) (Special Area of Conservation) (with 10 km of the installation but outside the 5 km screening distance for the two MCPs)

A Habitat Regulations Assessment (HRA) was completed to assess the potential to affect any of the sites identified. The project was screened for likelihood of significant effects and, taking account of the advice received from NRW's protected sites advisors, is considered not likely to have a significant effect on any National Site Network site (as documented in section 3.2 of OGN 200 Form 1, or section 5 if applicable). The full assessment is available to view on the public register.

### **11.2. Sites of Special Scientific Interest (SSSI)**

No SSSIs are located within 2 km of the installation. Therefore, no further assessment was required as there is no impact pathway to any SSSI due to the location of the installation.

### **11.3. Non-statutory conservation sites**

The following relevant non-statutory sites are located within 2 km of the installation:

- Cwm Cefnydfa
- Llywn-y-Brian
- Llety Woods
- Tylacoch South
- Nant Mwrth
- North Bettws Woodland
- Nant Bryncynan Woods
- Llety Brongu
- Ty'n-y-Waun
- Coed Pentwyn
- Tylacoch North
- Coed Coytrahen
- Cwm Nant Gwyn
- Drysity'n-y-waun
- Bettws West

There are also 7 ancient woodlands within 2 km. The applicant had assessed the 7 ancient woodlands, two of which are located within the installation boundary. The highest process contribution for NO<sub>x</sub> was 1.06 µg/m<sup>3</sup> long term (3.5% of the long term critical level) and the highest short term process contribution was 5.90 µg/m<sup>3</sup> (7.9% of the short term critical level). As the long term and short term process contributions are below 100% critical level screening for non-statutory sites, the emissions screen out and no further assessment was required.

Based upon the information in the application we are satisfied that there will be no adverse impact to the non-statutory conservation sites identified.

## **12. The Permit Conditions**

### **12.1. Updating permit conditions during consolidation**

We have updated previous permit conditions to those in the new generic permit template as part of permit consolidation. The new conditions have the same meaning as those in the previous permit.

The operator has agreed that the new conditions are acceptable.

### **12.2. Incorporating the variation**

We have specified that the applicant must operate the permit in accordance with descriptions in the application.

These descriptions have been specified in the Operating Techniques table (Table S1.2) in the permit.

### **12.3. Emission Limits**

We have decided that emission limits to air should be set for the two new boilers in the permit. Emissions Limit Values (ELVs) are in line with those set out in the MCP Directive.

The emission points for the old CHP (A1 and A6) and Shell boiler (A2 and A7) have been removed from the permit as these units will no longer be used and have been replaced with the two MCPs (A14 and A15). We have set the emission limits for NO<sub>x</sub> from the two new MCPs in line with limits set out in the MCPD. There are no changes to any existing emission limits to air or water.

### **12.4. Monitoring**

We have decided that monitoring should be carried out for the parameters listed in Schedule 3 of the permit using the methods and to the frequencies specified in those tables. These monitoring requirements have been imposed in order to demonstrate compliance with the emissions limits in the permit, as per the ELV and monitoring frequency requirements specified within the MCP Directive.

There are no changes to any other monitoring requirement.

### **12.5. Reporting**

We have specified the reporting requirements in Schedule 4 of the Permit to ensure data is reported to enable timely review by Natural Resources Wales to ensure

compliance with permit conditions and to monitor the efficiency of material use and waste recovery at the installation.

## 12.6. Raw materials and Waste Types

The operator had proposed to accept waste paper and paper off cuts referred to as “broke” produced by other papermills as a waste under the following European waste codes:

Waste code	Description
<b>03</b>	<b>Wood/Paper/Card processing</b>
03 03	Pulp – paper and cardboard production and processing
03 03 08	wastes from sorting of paper and cardboard destined for recycling
<b>15</b>	<b>Packaging, Absorbents, Wiping Cloths and Filters</b>
15 01	Packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
<b>19</b>	<b>Materials from Waste and Water Treatment</b>
19 12	Mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	paper and cardboard
<b>20</b>	<b>Municipal Waste and Similar Materials from Commerce and Industry</b>
20 01	Separately collected fractions (except 15 01)
20 01 01	paper and cardboard

We have accepted these wastes for the following reasons:

- The waste paper is similar to broke that is currently stored on site.
- The operator has provided a fire plan (Fire prevention and mitigation plan) in line and assessed against sector guidance on how to minimise the likelihood of fire and procedure for dealing with a fire incident.
- The site has waste acceptance procedure which outlines how waste is accepted and procedures for rejecting and dealing with non-conforming waste

After reviewing the waste framework directive and relevant guidance, we agree that these are classed as waste with the exception of broke material. Broke is considered

a byproduct as it satisfy Article 5 of the Waste Framework Directive<sup>7</sup> and therefore the proposed broke, on the basis that produced at other paper manufacturing, sites is considered a byproduct, not a waste. This is consistent with previous decisions on the use of externally sourced broke material produced at other paper sites as a feedstock. This situation only applies on the basis that the materials used is broke from other paper mills. All the other proposed waste papers that are not broke from other papermills are still classed as waste under the waste framework directive.

### **13. OPRA**

The OPRA score has changed as a result of this variation. The new agreed score is now 108 (was 156). This will form the basis for ongoing subsistence fee's.

**End of Document.**

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<sup>7</sup> [eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32008L0098](http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32008L0098)