SLR Consulting Limited

14 May 2026

Attention: William Wallace
Natural Resources Wales
Email only

SLR Project No.: 410.065169.00001

NRW Ref: PAN-029803

RE: Shotton Paper Mill Schedule 5 Response Letter

We are writing on behalf of Shotton Mill Limited in response to the Schedule 5 Notice for Further Information issued on 27th April 2026. The information is provided in support of the Environmental Permit (EP) variation application for the Shotton Paper Mill in Deeside, Flintshire.

For clarity, the questions from Natural Resources Wales (NRW) are listed in the left-hand column with the responses in the right-hand column.

There have been some changes to storage arrangements on site since the Fire Prevention & Mitigation Plan (FPMP) was submitted. There will no longer be any external storage of OCC bales therefore reference to this has been removed throughout the FPMP. The MRF is no longer operational so references to this has also been removed.

The FPMP has been updated and submitted along with the appendices.

The following drawings have been updated and submitted:

- 298002-00: EP Boundary and Site Layout; and
- OCC Warehouse.

Regards,

SLR Consulting Limited

Paul Wright
EU Regional Sector Leader – Industry and Technology

Question Number	Question	Response
Part 1: Cost Benefit Analysis		
	Provide a cost benefit analysis for energy efficiency of the combined heat and power plant as required by Schedule 24 of the Environmental Permitting Regulations 2016 and Energy Efficiency Directive 2012/27/EU. *Reason: Schedule 24 of Environmental Permitting Regulations requires a cost benefit analysis of the use of waste heat of any new combustion unit above 20 MWth (including variations to existing sites) and is also required by the Energy Efficiency Directive 2012/27/EU (Article 14). If a cost benefit analysis is not applicable to the combined heat and power plant provide a justification why.*	Both Schedule 24 of the Environmental Permitting Regulations 2016 and the Energy Efficiency Directive (EED) 2012/27/EU Article 14 (5), refers to Part 2 of Annex IX of the EED. EED Part 2 of Annex IX states 'If an electricity-only installation or an installation without heat recovery is planned, a comparison shall be made between the planned installations or the planned refurbishment and an equivalent installation producing the same amount of electricity or process heat, but recovering the waste heat and supplying heat through high-efficiency cogeneration and/or district heating and cooling networks.' The combined heat and power plant by its very definition recovers heat through high efficiency cogeneration. Each gas turbine has a heat recovery steam generator fitted, resulting in overall efficiencies of > 90%, see Figures 1 and 2. Therefore, no cost benefit analysis is required.
Part 2: Fire Prevention and Mitigation Plan		
1. Water Supplies		
a.	Provide more details on the extra 25,000 m3 fire water that can be imported. *Reason; Section 3.7 stated the ability to import 25,000 m3 but does not give an explanation of how this is done (for example by tanker) and under what situations this would be deemed necessary. Your response should also include the suitability of alternative water sources with the Fire and Rescue Service (FRS) equipment and the reliability of alternative sources.*	Section 3.7 of the FPMP has been updated.

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b.	Confirm if the hydrants are accessible and suitable for emergency use. This includes what standards they conform to (for example British standard 750 or equivalent).	Section 3.7 of the FPMP has been updated.
c.	For the water tanks outlined in Table I of the FPMP provide details on; i) If these tanks can work with Fire Rescue Service (FRS) equipment. ii) The maintenance and servicing of the tanks. iii) If the water in these tanks is suitable and safe to use by the fire rescue service. iv) If staff are trained on how to access the tanks in an emergency.	Section 3.7 of the FPMP has been updated.
2. Maximum Waste Volume and Fire Water Calculations		
a.	Provide the calculations and conversion factors used in table D. *Reason: Our calculation for volume does not match those provided for maximum volume in table D. We need to know the volume and the maximum length/width/height of the stockpiles (for OCC bales external storage, Tissue bales external storage and OCC Pulp Bales Internal Storage Building) and to calculate the fire water requirements. You also need to provide the calculations for the fire water requirements*	Table D has been updated. Maximum values have been provided (680 kg/m^2 and 100% utilisation). In reality the expected quantities will be lower (500kg/m^2 and 80% utilisation).
b.	Confirm the separation of bays 1, 2 and 3 *Reason; Bays 1,2 and 3 are grouped in one row within table D of the FPMP (as if it is one stack) but the plan "RCP WAREHOUSE SCHEMATIC DELUGE SYSTEM – VALVES" shows these bays as separate areas. Can you provide confirmation if the stack in these bays are separate or not.*	The stacks in bays 1,2 and 3 are separated but not by the distance required in the FPMP guidance (i.e. 13m). Therefore, they have been grouped as one in Table D of the FPMP.
c.	If your response to question 2 b) confirms Bay 1, 2 and 3 are one stack, provide additional measures in place to prevent and extinguish fires within this stack. *Reason, the calculations for a Baled-Baled (23 meters) or Baled to wall (20 meters) allows a maximum length of 50 meters (Natural Resources Wales / Check waste stack separation distances and stack lengths). Table D states that the length is 66 meters (assuming Bay 1-3 are considered*	Following on from the response to question 2b, to prevent and extinguish fires within this stack there is a comprehensive deluge system in place. The deluge system operates 3 cabinets over bays 1, 2 and 3. The system is triggered manually using the fire points by site operatives who occupy the building 24/7 and are trained to spot early signs of fire. Once triggered, the fire points also send an alarm to the

Question Number	Question	Response
	one stack). As such any deviation would need additional measures to provide equivalent protection and extinguishing time.	24/7 central control room who will alert the Emergency Response Team.
3. Stack Monitoring and Turning		
a.	State the frequency of stack turning (OCC and bale handling). *Reason: Section 2.5 states " Frequent turning of stacks is undertaken to ensure no build up of heat within waste storage areas" but does not specify the frequency of stack turning (e.g. is this done daily, weekly or based on weather conditions)*	Section 2.5 of the FPMP has been updated.
4. Enclosing Stacks Using Bays and Fire Walls		
a.	Bay and Fire Wall – Confirm the product specification of the bay and fire wall to ensure they meet the standards for fire resistance and that they are installed in line with manufacturer's requirements. *Reason – The FPMP states "a fire resistance period of at least 120 minutes" but does not confirm the specifications as outlined in the FPMP guidance.*	Section 2.3.2 of the FPMP has been updated.
b.	Provide additional detail on how the 1 meter freeboard will be maintained on top and sides at all time/	A freeboard is no longer planned for the bays in the OCC pulp bales internal storage. Additional and enhanced measures in place to prevent and extinguish fires are in place as follows: • comprehensive deluge system in place • very early detection of fires • building is manned 24/7 by site operatives who are trained to spot early signs of fire • fire points also send an alarm to the 24/7 central control room who will alert the Emergency Response Team
5. Management of Common Causes of Fire		
a.	Provide measures, in addition to monitoring, to reduce the likelihood of fire during warm weather.	Table E in the FPMP has been updated.
6. During an Incident		

Question Number	Question	Response
a.	Outline the timescales and actions for the isolation of the shut off valves *Reason; Section 3.8 of the FPMP states the following; Firewater will drain to the oil separators which benefit from shut off valves which can be activated to prevent firewater entering the fully contained site pond and lagoon. The FPMP will need more detail on the actions required to isolate the shut off valve.*	Section 3.8 of the FPMP has been updated.
b.	Confirm if equipment/mobile plant used to spread burning waste into the quarantine area (as outline in Section 3.6 of the FPMP) is fit for purpose and driven by a suitably qualified person (trained for such event).	Section 3.6 has been updated.
c.	Provide more details on techniques used to minimise fire spreading within the site during an incident.	Reference to Section 3.6 added to Section 3.9.
d.	Provide availability of responsible person(s) or a members of staff who could attend to assist the FRS.	Section 3.6 of the FPMP confirms that 4 members of the ERT are required to be on site at all times (24/7).
7. Managing Fire Water and Run Off		
a.	Provide the maximum volumes of fire water that can be contained within the waste storage areas (OCC and tissue pulp bale external storage areas, OCC pulp bales internal storage building and Tissue bale handling building).	Section 3.8 of the FPMP has been updated.
b.	Provide details within the FPMP on measures to prevent fire water (during a incident) from reaching surface water and ground water.	Section 3.8 of the FPMP has been updated.
8. Confirm the Location (in a site plan) of the Following		
a.	Any borehole or well located within or near the site.	There are no boreholes within or near the site used for the supply of water for human consumption, including private water supplies.
b.	The location of “off- site” emergency information pack with site plan.	Drawing 298002-00 has been updated.