

31 July 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 22nd July 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.

Please note, the Schedule 5 notice refers to *'the old corrugated cardboard (OCC) production line'*, which is incorrect, OCC is a feedstock not a product. The term should be containerboard.

The following documents have been submitted:

- 410.065169.00001_BATOT v4.
- 410.065711.00001 Shotton mill_OTNOC_final draft.

Regards,

SLR Consulting Limited



Paul Wright
EU Regional Sector Leader – Industry and Technology

Question Number	Question	Response
Paper and Pulp		
BAT 11		
a.	Provide details on any monitoring to be under taken for diffuse emissions. <i>Reason: we would need details on what monitoring is proposed form the diffuse emissions.</i>	Please refer to document 410.065169.00001_BATOT v4 Section 8.
BAT 13		
b.	Provide more details on compliance with this BAT. <i>Reason: the BATOT discusses the ETP's design but does not provide any details on selection of lower nitrogen and phosphorus chemical additives. BAT 13 is "to substitute chemical additives with high nitrogen and phosphorus contents by additives containing low nitrogen and phosphorus contents."</i>	Please refer to document 410.065169.00001_BATOT v4 Section 8.
BAT 18 a		
c.	Provide confirmation that the underground tanks and piping are either avoided in the design or that their location is well known and documented. <i>Reason: the other parts of BAT18 have been confirmed, but the BATOT measure for BAT 18 does not confirm if underground tanks/piping has been documented.</i>	Please refer to document 410.065169.00001_BATOT v4 Section 8.
BAT 47		
d.	Provide more details on how a combination of all techniques under BAT 47 a – d are applied to both OCC and the tissue mill. <i>Reason: the BAT only discusses techniques for OCC and not both OCC and tissue mill.</i>	Please refer to document 410.065169.00001_BATOT v4 Section 8.

Question Number	Question	Response
Waste Treatment		
BAT 3		
a.	Provide more detail on how the different parts of the BAT are to be integrated into the EMS.	Please refer to document 410.065169.00001_BATOT v4 Section 8.
Large Combustion Plant		
BAT 9		
a.	Provide more details on how the techniques comply with all 3 parts (I – iii) of this BAT conclusions.	Please refer to document 410.065169.00001_BATOT v4 Section 8.
BAT 10		
b.	If any preliminary other than normal operating conditions (OTNOC) management plans has been produced provide a copy.	Please refer to document 410.065711.00001 Shotton mill_OTNOC_final draft. Please note the NRW Site Officer is in the process of reviewing Boiler 7 start up and shutdown conditions. Once approved by NRW, the revised conditions will then be included in an updated OTNOC. On this basis, the OTNOC submission provided in this response will need to be updated once the start-up and shutdown conditions are agreed with NRW. Once agreed, the OTNOC plan will be re-submitted to the Site Officer for review.

