Your Ref: PAN-033580

13th August 2026

Natural Resource Wales (NRW)

emailed to: permitreceiptcentre@cyfoethnaturiolcymru.gov.uk

Environmental Permit Application
EMR Newport Dock, Northside, South Dock, Alexandra Dock, Newport, NP20 2WE

Thank you for your e-mail for further information in relation to the Environmental permit application at Newport Dock. Please find our responses below.

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PAN-033580 – Initial Observations of Environmental Permit Application		
O	**Observation**	**Response**
1	*A review of the applicable Activities, as those included in this application differ from the previous site permit as well as not fully addressing the activities outlined in other parts of the application. Based on the high level review the following may also be applicable and should also be considered for inclusion in the application:* - ***S5.4 A(1)(b)(iv) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving one or more of the following activities, and excluding activities covered by [F2the Urban Waste Water Treatment (England and Wales) Regulations 1994]— (iv)treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components.*** - ***S5.6 A(1)(a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3* and paragraph (b) of this Section. May be applicable depending on total input to site and length of storage. This also may be applicable due to backlog of fridges currently at the site.***	The listed activity 'S5.4 A(1)(b)(iv)' will not be applicable for this permit application, as EMR do not intend to operate the fragmentiser plant that is currently situated on site, and is therefore not considered as part of this permit application. However, listed activity 'S5.6 A(1)(a)' would be applicable for the storage of refrigeration and other WTEE units that will be recycled as part of the Fridge Destruction Plant. The document 'EMR Newport Dock Non-Technical Summary v2' has been amended to reflect this and attached with this response.
2	*We require a breakdown of the stated total maximum acceptance amount of 1,000,000 tonnes per year. The breakdown should be by Activity, Waste Stream and Process. This will also help us to understand if the Waste Operations are stand-alone or DAAs to the Schedule 1 Activities.*	The below breakdown of the suggested annual tonnage throughput for the activities in this Environmental Permit application are included in the amended document 'EMR Newport Dock Non-Technical Summary v2'. Metal Recycling – 900,000 tonnes Fridge Destruction Plant – 50,000 tonnes ELV Depollution – 30,000 tonnes WEEE Storage – 20,000 tonnes
3	*A flow diagram of the fridge recycling process has been provided in the application. Please also provide a similar diagram for the other input wastes.*	Flow charts for the other activities on site have been included in included in the amended document 'EMR Newport Dock Non-Technical Summary v2'.

4	*The FPMP link within the online Application form is broken. A shared link will be sent to your email address to allow you to upload the FPMP.*	EMR will upload the FPMP through the shared link.
5	*Provide evidence of an Environmental Management System. Clarification of the status of the Environmental Management System is needed for us to evaluate Operator competence. Varying descriptions of its status and level of certification are included in the application documents.*	Please see attached as part of this response, the latest ISO14001 certificate for EMR Group Ltd. The EMR Newport Dock site is currently not a part of this certification, but ISO14001 accreditation will be implemented on site.

6	*A H1 Assessment for emissions to air is required due to the proximity to multiple SACs, a Ramsar site and multiple SSSIs. Depending on the result of the H1 Assessment modelling may also be required.*	A H1 air assessment has been completed and included with this response. The H1 considers the parameters of CFC's and VOC's as these are the suggested monitoring parameters from the two air emission points on site within the Environmental Permit application and from the previous Environmental Permit for the Fridge Destruction Plant. For the VOC's parameter, as there is no data on the speciated VOCs released from the air emission points, 100% of the expected VOCs is assumed to be Benzene, as per the guidance. A concentration of 15mg/m3 has been selected as this is the suggested limit for VOC's within the Environmental Permit application and from the previous Environmental Permit for the Fridge Destruction Plant. For the CFC's parameter, there is no grouped CFC's option in the list of substances within the H1 assessment, nor a relevant CFC in relation to the destruction of refrigeration units (e.g. CFC-11 or CFC-12). Therefore, the substance 'methyl chloride' has been selected to represent CFC's as it is a volatile chlorinated compound, with strict EAL's in place. A concentration of 10mg/m3 has been selected as this is the suggested limit for CFC's within the Environmental Permit application and from the previous Environmental Permit for the Fridge Destruction Plant. The H1 assessment screens out both compounds and is a 'worst-case' scenario based on a 100% operating mode, which would be unlikely due to the checks and shutdowns that are required as part of the plant's maintenance.

7	*We note that you intend to include the water discharges previously permitted under independent permits. Discharges to water will now be considered as part of this application process, not separately, and depending on the further information provided by EMR, can be included within the EPR permit.* *The previous permits were:* • *AN0325701/02 – trade/site discharge* • *DB3292CQ – sewage discharge 3m3/day for 55 staff* *EMR will need to provide information on the potential for the trade effluent to contain hazardous contaminants and conduct a H1 surface water pollution risk assessment if these are present in the discharge.* *Sewage discharge will not need a H1 and is not modelled. Information on expected volume and number of site-based staff is needed.*	Please see along with this response a H1 assessment for waters.
8	*EMR has completed the EA's Noise Advisory Tool and concluded that a NIA and NMP are not required for this site. Please provide a copy of the tool and the information will be reviewed to understand and evaluate the risks. We may come back to EMR for further information or request the use of another tool.*	The noise advisory tool completed for EMR Newport Dock site has been attached as part of this response.
9	*A Continuing Competency Certificate for CIWM (Wamitab) has been provided but you haven't provided a copy of the Primary Competence Certificate. We will require a copy of the Level 4 CIWM (Wamitab) primary competency that the TCM holds.*	The primary certificate for Martin Crossman for the metal recycling qualification has been included as part of this response. We are in the process of recovering the primary certificates for the ELV and WEEE qualifications from CIWM and will send these to NRW once we receive them. We have also provided the primary certificates and most recent continuing competency certificate for Durandt Wasserman, who can also provide the relevant technical competence for this application.

We trust this information meets your requirements. Please contact us if you need any further clarification on the responses provided.