**Environmental permitting: standard rules permits - consultation 25**

We are consulting on a number of changes to current standard rules sets so the online consultation has been set up so that you can answer all the consultation questions or answer just the questions that are relevant to the permit(s) that you wish to provide comments on.

The consultation questions should be completed on our online consultation tool:

* <https://consult.environment-agency.gov.uk/environment-and-business/standard-rules-consultation-no-25/>

You must complete section 3 (the general consultation questions) and question 52 on the financial impacts of the proposed changes. You can then either select the sections of the consultation which are relevant to you or complete all the sections.

**General consultation questions relating to all activities**

**How we will use your information**

We will use your information to help shape these standard rules permits.

We will look to make all responses publicly available after the consultation, unless you have specifically requested that we keep your response confidential.

We will publish a summary of responses on our website in which we will publish the name of the organisation for those responses made on behalf of organisations. We will not publish names of individuals who respond.

We will not respond individually to responses. After the consultation has closed we will contact you to let you know when the summary of responses is available.

In line with the Freedom of Information Act 2000, we may be required to publish your response to this consultation but will not include any personal information. If you have requested your response to be kept confidential, we may still be required to provide a summary of it.

For more information see our [Personal Information Charter](https://www.gov.uk/government/organisations/environment-agency/about/personal-information-charter).

1. Do you give permission for us to publish your consultation responses? We will not include personal information.

If, no, please tell us why below as we will need to understand this when responding to any Freedom of Information requests.

2. Would you like to receive an email to let you know that the summary of responses has been published?

By providing your email address you will be able to return to edit your consultation at any time until you submit it. You will also receive an acknowledgement email when you complete the consultation, and we will notify you when the summary of consultation responses has been published.

**Privacy Notice**

*The Environment Agency would like to keep you informed about the outcomes of the consultation. If you would like to receive an email acknowledging your response and be notified that the summary of responses has been published please give us your email address in your response to this consultation.*

*By providing us with your email address you consent for us to email you about the consultation. We will keep your details until we have notified you of the response document publication.*

*We will not share your details with any other third party without your explicit consent unless required to by law.*

*You can withdraw your consent to receive these emails at any time by contacting us at*[*standard-rules@environment-agency.gov.uk*](mailto:standard-rules@environment-agency.gov.uk)*.*

3. If you operate a permitted waste facility (or facilities), please tell us what kind it is (they are).

* Inert waste treatment facility or transfer station
* Materials Recycling Facility (MRF)
* Non-hazardous waste transfer station or treatment facility
* Non-hazardous waste treatment facility with hazardous waste storage and transfer
* Household waste recycling centre
* Wood treatment facility
* End of life vehicle depollution facility
* Metals recycling facility
* Other (please give details of site type)
* I don't operate a permitted waste facility

4. When we come to analyse the results of this consultation, it would help us to know if you are responding as an individual, or on behalf of an organisation/group.

Please select one of the following options:

* Responding as an individual
* Responding on behalf of an organisation or group
* Other (please specify)
* If you're responding on behalf of an organisation or group, please tell us who you are responding on behalf of.

5. Please tell us how you found out about this consultation:

* From the Environment Agency
* From another organisation
* Through an organisation you’re a member of
* Press article
* Social media e.g. Facebook, Twitter
* Through a meeting you attended
* Other (please specify)

**SR2022 No 1. Treatment of waste to produce soil, soil substitutes and aggregate**

This standard rule will replace:

* [SR2008 No 11: 75kte inert and excavation waste transfer station with treatment](https://www.gov.uk/government/publications/sr2008-no11-75kte-inert-and-excavation-waste-transfer-station-with-treatment)
* [SR2009 No 6: inert and excavation waste transfer station with treatment below 250kte](https://www.gov.uk/government/publications/sr2009-no6-inert-and-excavation-waste-transfer-station-with-treatment-below-250kte)
* [SR2010 No 12: treatment of waste to produce soil, soil substitutes and aggregate](https://www.gov.uk/government/publications/sr2010-number-12)

 It will allow the operator to:

* operate a waste facility where soils and aggregates are manufactured from waste
* accept construction and demolition wastes such as soils, concrete and bricks, and also specified waste types which are used to manufacture soil, for example compost and gypsum
* accept no more than 75,000 tonnes of waste each year. The combined storage limit of all wastes stored on the site at any one time is limited to 50,000 tonnes
* carry out treatments limited to sorting, separation, screening, crushing and blending
* soil/aggregate washing is not permitted
* if the site is within 200 metres of another workplace or residential dwelling the waste must be treated in an enclosed building

We have also separated out the wastes which are suitable for the production of aggregate from those suitable for the production of soil and soil substitutes.

**Questions**

1. Do you support restricting this standard rule permit to recovery only?
2. Do you support removal of the 99 codes from this permit? (Please specify the codes you want reinstated and explain why in the box below)
3. We have separated out wastes which are suitable for the production of aggregate from those suitable for the production of soil and soil substitutes. Do you support this? (Please give your reasons why you agree or disagree).
4. Have we separated the wastes correctly? (Please describe why and set out your alternative proposals in the box below)
5. Are there any treatment activities missing from this rule set? (If you answered yes please describe the activities that should be added. Provide details of any controls needed to limit the risk of pollution and harm to human health).
6. Do you agree with the requirement that treatment must be carried out within an enclosed building on sites situated within 200 metres of a workplace, residential dwelling, or within an AQMA? (Please provide your reasons in the box below)
7. We have included a definition of enclosed building in condition 4.3 - interpretation. Do you agree with this definition? (Please provide reasons why including your alternative proposal in the box below)
   * 1. *“enclosed building” means a construction designed to provide sheltering cover and minimise emissions of noise, particulate matter, odour and litter. It must be enclosed on all sides and doorways must be as small as practicable.*
8. We want to ensure that this SR provides the right protection measures for people and the environment without the need for a site-specific and bespoke assessment. Are there any limits or restrictions you disagree with? (Please provide details and alternatives proposals in the box below).
9. This permit requires the operator to manage and operate the activities in accordance with the non-hazardous and inert waste appropriate measures guidance unless alternative measures have been submitted and agreed in writing. Do you agree with our approach? (Please give your reasons why you agree or disagree with this approach in the box below).

**SR2022 No2. Mobile plant for treatment of waste to produce soil, soil substitutes and aggregate**

This standard rule will replace:

* [SR2010 No 11: mobile plant for treatment of waste to produce soil, soil substitutes and aggregate](https://www.gov.uk/government/publications/sr2010-number-11)

It will allow the operator to:

* operate mobile plant to manufacture soils and aggregates from waste, at the site where the waste was produced, or at the site where the waste will be used
* treat no more than 75,000 tonnes of waste at any particular deployment. No more than 5,000 tonnes of imported waste can be stored at a deployment site
* carry out treatments limited to sorting, separation, screening, crushing and blending
* soil and aggregate washing is not permitted.

Questions

1. We have identified several 99 codes in this permit which we have removed. 99 codes are too general and we consider that more specific codes can be used. Do you support us removing these waste codes? If no (please specify which ones you want reinstated and why).
2. Are there any treatment activities missing from this rule set? Describe the activities that should be added with the controls needed to limit the risk of pollution and harm to human health.
3. We want to ensure that this permit provides the right protection measures without the need for a site-specific and bespoke assessment. Are there any other limits or restrictions you disagree with? Provide alternative proposals and evidence to support them.

**SR2022 No.3: Inert & Excavation Waste transfer station up to 250,000 tonnes per year**

This standard rule will replace:

* [SR2008 No 10: 75kte inert and excavation waste transfer station](https://www.gov.uk/government/publications/sr2008-no10-75kte-inert-and-excavation-waste-transfer-station)
* [SR2009 No 5: Inert and excavation waste transfer station below 250kte](https://www.gov.uk/government/publications/sr2009-no5-inert-and-excavation-waste-transfer-station-below-250kte)

It will allow the operator to:

* operate a waste facility for the bulking up and transfer of inert and excavation wastes only for disposal or recovery elsewhere
* accept no more than 250,000 tonnes per year
* carry out treatments limited to manually sorting and separating wastes for recovery

**Questions**

1. We are removing the standard rules permit with the lower annual throughput do you agree? Please give reasons why you agree or disagree with this proposal.
2. This permit requires the operator to manage and operate the activities in accordance with the non-hazardous and inert waste appropriate measures guidance unless alternative measures have been submitted and agreed in writing. Do you agree with this approach? Please give your reasons why you agree or disagree with this approach in the box below.

**SR2022 No.4: Non-Hazardous Waste Recycling with asbestos, hazardous batteries and hazardous WEEE storage**

This standard rules permit will replace:

* [SR2008 No 5: 75kte household, commercial and industrial waste transfer station and asbestos storage](https://www.gov.uk/government/publications/sr2008-no5-75kte-household-commercial-and-industrial-waste-transfer-station-and-asbestos-storage)
* [SR2008 No 6: Household, commercial and industrial waste transfer station with asbestos storage (no building)](https://www.gov.uk/government/publications/sr2008-no6-household-commercial-and-industrial-waste-transfer-station-with-asbestos-storage-no-building)
* [SR2008 No 7: 75kte household, commercial and industrial waste transfer stations with treatment and asbestos storage](https://www.gov.uk/government/publications/sr2008-no7-75kte-household-commercial-and-industrial-waste-transfer-station-with-asbestos-storage)
* [SR2008 No 8: Household, commercial and industrial waste transfer station with treatment and asbestos storage (no building)](https://www.gov.uk/government/publications/sr2008-no8-household-commercial-and-industrial-waste-transfer-station-with-treatment-and-asbestos-storage-no-building)
* [SR2015 No 8: 75kte household, commercial and industrial waste transfer station with asbestos storage](https://www.gov.uk/government/publications/sr2015-no8-75kte-household-commercial-and-industrial-waste-transfer-station-with-asbestos-storage)
* [SR2015 No 10: 75kte household, commercial and industrial waste transfer station with treatment and asbestos storage](https://www.gov.uk/government/publications/sr2015-no10-75kte-household-commercial-and-industrial-waste-transfer-station-with-treatment-and-asbestos-storage)

It will allow the operator to:

* store and treat a range of non-hazardous and inert wastes
* store asbestos wastes which must be double-bagged and stored in secure, lockable containers
* store and sort hazardous batteries and Waste Electrical and Electronic Equipment (WEEE)
* accept no more than 75,000 tonnes each year
* daily throughput of waste shall be less than 75 tonnes
* the combined quantity of non-hazardous wastes in schedule 1 stored prior to processing and any processed wastes derived from them shall not exceed 15,000 tonnes at any one time
* the combined quantity of wastes listed in Schedule 2 of these rules, and any processed wastes derived from them shall not exceed 40,000 tonnes in total at any one time
* carry out treatments limited to sorting, separation, screening, baling, shredding, crushing and compaction
* processes such as sink float density separation and soil or aggregate washing are not permitted
* all waste listed in Schedule 1 of this permit shall be stored and treated in an enclosed building

if the site is in a specified Air Quality Management Area (AQMA) or within 200 metres of another workplace or residential dwelling the waste listed in Schedule 2 must be treated in an enclosed building.

**Questions**

1. We originally called this standard rules permit: Non-hazardous waste recycling and asbestos storage. We think calling it "non-hazardous waste recycling with asbestos, hazardous batteries and hazardous WEEE storage" better reflects the activity and is the terminology commonly used by industry. Do you support the proposed title? If no please provide an alternative title.
2. We have added hazardous battery and hazardous WEEE waste codes to this permit because it reflects the increase in batteries and WEEE being classified as hazardous waste and will allow greater flexibility of waste types accepted. Do you support the inclusion of these waste types? Please give your reasons why you agree or disagree with the inclusion of these codes in the box below.
3. Amenity issues, such as noise, dust, odours and pests have arisen from activities allowed by this permit. We consider that all treatment and handling, with the exception of waste listed in Schedule 2 shall take place in an enclosed building. Do you agree with this principle? Please give your reasons why you agree or disagree with this approach in the box below.
4. We consider that treatment of wastes listed in schedule 2 (soils, concrete bricks etc) should be carried out in an enclosed building if the site is situated within 200 metres of a residential dwelling or workplace or within an AQMA. Do you agree with this principle? Please give your reasons why you agree or disagree with this approach in the box below.
5. We have included a definition of enclosed building in Section 4.3 of the permit. Do you agree with this definition? If no please provide reasons why and an alternative definition.

*“enclosed building” means a construction designed to provide sheltering cover and minimise emissions of noise, particulate matter, odour and litter. It must be enclosed on all sides and doorways must be as small as practicable.*

1. We have reviewed waste return data for the standard rule permits that this rule set will replace. We are proposing to remove waste codes listed below. Do you agree with excluding these waste types? Which codes would you wish to see retained please provide your reasons why in the box below.
2. We want to ensure that this permit provides the right protection measures for people and the environment, without the need for a site-specific and bespoke assessment. Are there any other limits or restrictions you disagree with or think we should include? Please provide details and evidence to support your comments.
3. This permit requires the operator to manage and operate the activities in accordance with the non-hazardous and inert waste appropriate measures guidance unless alternative measures have been submitted and agreed in writing. Do you agree with this approach?
4. We are minded to add hazardous waste wood codes 17 02 04\* and 20 01 37\* to this permit. Do you agree with this proposal?\*\* Please give your reasons for agreeing or disagreeing with this proposal in the box below. Include any measures you think we should require to store and transfer hazardous waste wood.

\*\* *We know that waste wood removed from demolition sites or from the refurbishment of business premises may have been treated with chemicals that make that waste wood hazardous.*

*To avoid installation thresholds from being met, we would allow up to 50 tonnes/day of hazardous waste for storage.*

*In allowing waste wood codes 17 02 04\* and 20 01 37\* we are minded to exclude the following wood types, typically arising from specialist demolition activities:*

* *railway sleepers*
* *telegraph poles*
* *waste wood from hydraulic engineering, such as wood from docks*
* *waste wood from industrial applications such as cooling tower timbers, wood block flooring or moulds, industrial buildings*
* *waste wood from boats, carriages and trailer beds*
* *waste wood treated with creosote*

**SR2022 No.5: Non-Hazardous Waste Recycling**

This standard rule permit will replace:

* [SR2008 No 1: 75kte household, commercial and industrial waste transfer station](https://www.gov.uk/government/publications/sr2008-no1-75kte-household-commercial-and-industrial-waste-transfer-station)
* [SR2008 No 2: Household, commerical and industrial waste transfer station (no building)](https://www.gov.uk/government/publications/sr2008-no2-household-commercial-and-industrial-waste-transfer-station-no-building)
* [SR2008 No 3: 75kte household, commercial and industrial waste transfer station with treatment](https://www.gov.uk/government/publications/sr2008-no3-75kte-household-commercial-and-industrial-waste-transfer-station-with-treatment)
* [SR2008 No 4: Household, commercial and industrial waste transfer station with treatment (no building)](https://www.gov.uk/government/publications/sr2008-no4-household-commercial-and-industrial-waste-transfer-station-with-treatment-no-building)
* [SR2015 No 4: 75kte household, commercial and industrial waste transfer station](https://www.gov.uk/government/publications/sr2015-no4-75kte-household-commercial-and-industrial-waste-transfer-station)
* [SR2015 No 5: household, commercial and industrial waste transfer station (no building)](https://www.gov.uk/government/publications/sr2015-no5-household-commercial-and-industrial-waste-transfer-station-no-building)
* [SR2015 No 6: 75kte household, commercial and industrial waste transfer station with treatment](https://www.gov.uk/government/publications/sr2015-no6-75kte-household-commercial-and-industrial-waste-transfer-station-with-treatment)

It will allow the operator to:

* store and treat a range of non-hazardous and inert wastes
* accept no more than 75,000 tonnes each year
* daily throughput of waste listed in Schedule 1 shall be less than 75 tonnes
* wastes listed in Schedule 1 of these rules, and any processed wastes derived from them shall not exceed 15,000 tonnes in total at the site at any one time
* wastes listed in Schedule 2 of these rules, and any processed wastes derived from them shall not exceed 40,000 tonnes in total at the site at any one time
* carry out treatments limited to sorting, separation, screening, baling, shredding, crushing and compaction. Soil and aggregate washing and density separation is not permitted
* all waste listed in Schedule 1 of this permit shall be stored and treated in an enclosed building

If the site is in a specified Air Quality Management Area or within 200 metres of another workplace or residential dwelling the waste listed in Schedule 2 must be treated in an enclosed building

**Questions**

1. This permit is identical to SR2021 No.4, but without any hazardous waste codes. If we did not have a corresponding permit that is restricted to non-hazardous codes then operators would need to demonstrate they had appropriate Technical Competence to manage hazardous wastes. Do you support the inclusion of this rule set without any hazardous waste codes?
2. We have reviewed waste return data for the standard rule permits that this rule set will replace. We are proposing to remove waste codes listed below. Do you agree with excluding these waste types?
3. This permit requires the operator to manage and operate the activities in accordance with the non-hazardous and inert waste appropriate measures guidance unless alternative measures have been submitted and agreed in writing. Do you agree with this approach? Please give your reasons why you agree or disagree with this approach in the box below.
4. We want to ensure that this permit provides the right protection measures for people and the environment, without the need for a site-specific and bespoke assessment. Are there any other limits or restrictions you disagree with or think we should include? Please provide details and evidence to support your comments.

**SR2022 No.6: Household waste recycling centre**

This standard rule permit will replace:

* [SR2008 No 12: 75kte non hazardous household waste amenity site](https://www.gov.uk/government/publications/sr2008-no12-75kte-non-hazardous-household-waste-amenity-site)
* [SR2008 No 13: 75kte non hazardous and household waste amenity site](https://www.gov.uk/government/publications/sr2008-no13-75kte-non-hazardous-and-hazardous-household-waste-amenity-site)
* [SR2015 No 19: 75kte non hazardous household waste amenity site](https://www.gov.uk/government/publications/sr2015-no19-75kte-non-hazardous-household-waste-amenity-site)
* [SR2015 No 20: 75kte non hazardous and hazardous household waste amenity site](https://www.gov.uk/government/publications/sr2015-no20-75kte-non-hazardous-and-hazardous-household-waste-amenity-site)

It will allow the operator to:

* operate a household waste recycling centre which is required to be provided by a waste disposal authority
* store and treat a range of non-hazardous and hazardous household wastes brought by members of the public. Similar wastes from commercial and industrial sources may be permitted.
* accept no more than 75,000 tonnes each year
* carry out treatments limited to sorting, separation, shredding or compaction
* wastes can also be bulked up for recovery or disposal elsewhere
* treatment for disposal is limited to 50 tonnes each day
* treat and store no more than 10 tonnes of hazardous waste day

**Questions**

1. We have defined a Household Waste Recycling Centre in the introductory note for this permit. Do you support the permit title and the definition given in the introductory note? Please provide your alternative title and/or definition in the box below.
   * *These rules allow the permit holder to operate a household waste recycling centre which are required to be provided by the Waste Disposal Authority where a range of non-hazardous and hazardous household wastes can be brought by members of the public. Similar wastes from Commercial and Industrial sources may be permitted.*
2. This permit requires the operator to manage and operate the activities in accordance with the non-hazardous and inert waste appropriate measures guidance unless alternative measures have been submitted and agreed in writing. Do you agree with this approach? Please give your reasons why you agree or disagree with this approach in the box below.

**SR2022 No.7: Materials recycling facility**

This standard rule permit will replace:

* [SR2008 No 14: 75kte materials recycling facility](https://www.gov.uk/government/publications/sr2008-no14-75kte-materials-recycling-facility)
* [SR2008 No 15: Materials recycling facility (no building)](https://www.gov.uk/government/publications/sr2008-no15-materials-recycling-facility-no-building)
* [SR2015 No 21: 75kte materials recycling facility](https://www.gov.uk/government/publications/sr2015-no21-75kte-materials-recycling-facility)

It will allow the operator to:

* store and treat source segregated household and similar waste from commercial and industrial sources, including some specified recyclable mixed municipal wastes
* carry out treatments limited to sorting, separation, screening, baling, shredding and compaction
* accept no more than 75,000 tonnes each year, with the daily throughput of waste being less than 75 tonnes
* store up to 15,000 tonnes at any one time of wastes listed in Schedule 1 and any processed wastes derived from them
* store and treat all wastes inside an enclosed building

**Questions**

1. Amenity issues, such as noise, dust, odours and pests have been a particular cause of complaints. We consider that all treatment, handling and storage shall take place in an enclosed building. Do you agree with this principle? Please give your reasons why you agree or disagree with this approach in the box below.
2. We have included a definition of enclosed building in Section 4.3 of the permit. Do you agree with this definition?  Please provide reasons why and an alternative definition.

* *“enclosed building” means a construction designed to provide sheltering cover and minimise emissions of noise, particulate matter, odour and litter. It must be enclosed on all sides and doorways must be as small as practicable.*

1. We want to ensure that this permit provides the right protection measures for people and the environment, without the need for a site-specific and bespoke assessment. Are there any other limits or restrictions you disagree with or think we should include? Please provide details and evidence to support your comments.
2. This permit requires the operator to manage and operate the activities in accordance with the non-hazardous and inert waste appropriate measures guidance unless alternative measures have been submitted and agreed in writing. Do you agree with this approach? Please give your reasons why you agree or disagree with this approach in the box below.

**SR2022 No 8: Waste wood treatment**

This standard rule permit will replace:

* [SR2011 No 4: Treatment of waste wood for recovery (existing permits)](https://www.gov.uk/government/publications/sr2011-no4-treatment-of-waste-wood-for-recovery)
* [SR2015 No 23: Treatment of waste wood for recovery](https://www.gov.uk/government/publications/sr2015-no23-treatment-of-waste-wood-for-recovery)

It will allow the operator to:

* store and process waste wood
* accept no more than 25,000 tonnes of waste each year. Daily throughput of waste shall be less than 75 tonnes.
* store waste wood for up to 6 months on the site. Wood of less than 150mm in length cannot be stored for longer than 3 months.
* carry out treatments limited to sorting, cutting, pulverising, shredding and chipping

The permit has conditions for stack sizes and heights. These are:

* wood of more than 150mm in length may be stored in stacks of up to 750 cubic metres
* wood of between 30 and 150mm in length may be stored in stacks of up to 450 cubic metres
* wood of less than 30mm in length may be stored in stacks of up to 300 cubic metres
* wood stacks must be less than 4 metres in height
* stacks must be located 6 metres or more from each other, unless an appropriate fire wall is used with at least 1 metre freeboard

**Questions**

1. We have restricted this SR to sorting, separation, cutting, pulverising, shredding, chipping and blending activities. We think these are the activities undertaken during waste wood processing. Have we missed any processing activity? If yes - please specify the activities with the reason they are carried out and how the risks to the environment are managed.
2. Due to our increased understanding of self-combustion in waste wood stacks, we consider that we can increase the throughput limit of wood from 5,000 tonnes to 25,000 tonnes per year. We have incorporated specific fire prevention conditions in this permit. Do you agree with this approach? Please give your reasons why you agree or disagree with this approach in the box below.
3. We have included a definition of "stack" in Section 4.3 of the permit. Do you agree with this definition? If no provide the reason and details of an alternative definition.
   * *“Stack” – dimensions of the wood stack (or the wood pile) and the length of wood items in that stack.  This should be taken as approximate measurements.  Whilst the stack will contain a range of individual wood items of different lengths down to fines, the amount of wood in that stack should, on balance, be of the length or the longest axis, specified.*
4. The proposed permit includes stack dimensions and associated storage periods. Do you agree with the permit having specific limits on stack volumes and storage periods? Please give your reasons why you agree or disagree with this approach in the box below.
5. Are there any other limits or restrictions you disagree with? Please list them and provide alternative proposals with evidence to support them.
6. We are minded to add hazardous waste wood codes 17 02 04\* and 20 01 37\* to this permit. Do you agree with this proposal? Please give your reasons for agreeing or disagreeing with this proposal. Include any measures you think we should require for handling and processing hazardous waste wood.

Further information

*We know that waste wood removed from demolition sites or from the refurbishment of business premises may have been treated with chemicals that make that waste wood hazardous. We are proposing to add waste wood codes 17 02 04\* and 20 01 37\* to the permit.*

*To avoid the activity becoming an installation the permit will allow up to a maximum of 10 tonnes  per day of hazardous waste for processing.*

*We are proposing to allow blending of hazardous waste wood with non-hazardous waste wood. The resulting blend must be consigned from the site as mixed hazardous waste wood - 19 02 04\* (Premixed wastes composed of at least one hazardous waste - mixed wood only).*

*We propose to exclude the following wood types, typically arising from specialist demolition activities –*

* *railway sleepers*
* *telegraph poles*
* *waste wood from hydraulic engineering, such as wood from docks*
* *waste wood from industrial applications such as cooling tower timbers, wood block flooring or moulds, industrial buildings*
* *waste wood from boats, carriages and trailer beds*
* *waste wood treated with creosote*

1. This permit requires the operator to manage and operate the activities in accordance with the non-hazardous and inert waste appropriate measures guidance unless alternative measures have been submitted and agreed in writing. Do you agree with this approach? Please give your reasons why you agree or disagree with this approach in the box below.

**Proposed changes to metal recycling rule sets**

We are proposing to amend table 2.1 in the following standard rules permits:

* SR2008 No.20
* SR2008 No.21
* SR2011 No.2
* SR2011 No.3
* SR2012 No.14
* SR2015 No.13
* SR2015 No.14
* SR2015 No.16
* SR2015 No.17
* SR2015 No.18

The current wording in table 2.1 is “There shall be no treatment of lead acid batteries, other than sorting and separating from other wastes”.

We are proposing to change the wording to “There shall be no treatment of batteries, other than sorting and separating from other wastes”.

The proposed amendment is to clarify that the permits prohibit battery treatments other than sorting and segregation for onward recycling.

Until very recently lead acid batteries were the predominant battery chemistry that metal recycling and end of life vehicle sites were accepting. This was why the current wording in table 2.1 specifically relates to lead acid batteries.

With the increase of hybrid and electric vehicles other battery chemistries will start to be accepted. We want to make it clear that the treatment of any battery chemistry is not authorised by these permits. Operators seeking to recover batteries will need to vary their permit to enable them to do this.

The conditions of the standard rules permits and the associated risk assessments do not assess or mitigate the risks posed by battery treatment processes. The recovery of metals and other materials from batteries poses different risks to general metal recycling and vehicle dismantling operations. Depending on the battery chemistry and process used, the emissions generated will require additional abatement and monitoring. The treatment of batteries must also meet the requirements set out in [Directive 2006/66/EC](https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32006L0066) of the European Parliament and of the Council on batteries and accumulators and waste batteries and accumulators.

We are proposing to add a fire prevention plan conditions to SR 2008 No. 22 - Storage of furnace ready scrap and SR 2009 No.7 - Storage of furnace ready scrap. This is in response to recent fires that have occurred within furnace ready scrap stock piles.

In addition we have removed waste codes 12 01 02 - ferrous metal dust and particles and 12 01 04 - non-ferrous metal dust and particles from (SR 2008 No. 22 and SR 2009 No. 7. This is because table 2.2 excludes wastes consisting solely or mainly of dusts, powders or loose fibres.

We are also proposing to add the following wording to the interpretation section in condition 4.1.1 to all of these permits:

“hardstanding” means ground surfaced with a hard permeable material. It must be capable of being kept clear of debris, being maintained so that it does not cause surface water ponding, and remaining level and rut free”.

**Questions**

1. We have amended the wording in table 2.1 of the following permits: SR2008 No.20, SR2008 No.21, SR2011 No.2, SR2011 No.3, SR2012 No.14, SR2015 No.3, SR2015 No.13, SR2015 No.14, SR2015 No.16, SR2015 No.17, SR2015 No.18. This is to make it clear that the permits do not allow the treatment of any battery chemistry. Do you agree with this amendment?
2. We have included a definition of “hardstanding” in the interpretation section of these permits. Is it useful to include this definition?
3. We have amended the wording in table 2.3 of the SR 2008 No.22 and SR2009 No.7 to include a condition relating to fire prevention and fire prevention plans. Do you agree with the proposed condition?
4. Do you have any further comments on our proposed changes to these metal recycling permits?

**Proposed changes to standard rule SR2010 No 3**

In authorising a discharge of up to 20m3/d the current set of standard rules require us to determine whether the discharge can reasonably be made to an existing public foul sewer.

To assess compliance with this rule for standard rules permit applications we use an indicative distance of 30m per residential property. This is to determine whether a bespoke assessment of reasonableness is required.

The proposed change to the standard rules makes this process more transparent by referring directly to the relevant screening distance in the rule set itself. A distance of 800m has been used to reflect the distance applicable to the maximum discharge rate of 20m3/d that would be authorised by any standard rules permit.

1. Do you agree with the proposed changes to this standard rule permit?

**Proposed charges**

The proposed charges for the new rule sets are set out below. They have been selected from the application table, subsistence table and default standard rules charging table in the [EPR charging scheme](https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges).

These charges aim to precisely recover the regulatory costs incurred by the Environment Agency as a result of the applications and compliance work associated with these permits. In highlighted cases, the permit application charge includes assessment of the fire prevention plan (FPP).

**Question**

1. Do you agree with the proposed charges for these permits?

**Details included in the consultation**

Proposed charges

We have also set out the proposed charges for the new rule sets. We have selected these charges from the application table, subsistence table and default standard rules charging table in the [EPR charging scheme](https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges). These charges aim to precisely recover the regulatory costs incurred by the Environment Agency as a result of the applications and compliance work associated with these permits. In highlighted cases, the permit application charge includes assessment of the FPP.

**SR2022 No 1**

* Permit application    £2,641
* Minor variation        £792
* Normal variation      N/A
* Substantial variations N/A
* Transfer application £2, 529
* Surrender application £1,585
* Subsistence fee £1,920

**SR2022 No 2**

* Permit application    £2,641
* Minor variation        N/A
* Normal variation      N/A
* Substantial variations N/A
* Transfer application £2, 529
* Surrender application N/A
* Deployment fee £1,519

**SR2022 No 3**

* Permit application    £2,641
* Minor variation        £792
* Normal variation      N/A
* Substantial variations N/A
* Transfer application £2, 529
* Surrender application £1,585
* Subsistence fee £1,920

**SR2022 No 4**

* Permit application    £3,926 (includes assessment of FPP)
* Minor variation        £1,178
* Normal variation      N/A
* Substantial variations N/A
* Transfer application £2, 529
* Surrender application £2,356
* Subsistence fee £4,169

**SR2022 No 5**

* Permit application    £3,926 (includes assessment of FPP)
* Minor variation        £1,178
* Normal variation      N/A
* Substantial variations N/A
* Transfer application £2, 529
* Surrender application £2,356
* Subsistence fee £4,169

**SR2022 No 6**

* Permit application    £3,926 (includes assessment of FPP)
* Minor variation        £1,178
* Normal variation      N/A
* Substantial variations N/A
* Transfer application £2,529
* Surrender application £2,356
* Subsistence fee £1,109

**SR2022 No 7**

* Permit application    £3,926 (includes assessment of FPP)
* Minor variation        £1,178
* Normal variation      N/A
* Substantial variations N/A
* Transfer application £2, 529
* Surrender application £2,356
* Subsistence fee £4,169

**SR2022 No 8**

* Permit application    £3,926 (includes assessment of FPP)
* Minor variation        £1,178
* Normal variation      N/A
* Substantial variations N/A
* Transfer application £2, 529
* Surrender application £2,356
* Subsistence fee £1,920

**Financial impacts question and further comments or information**

The Growth Duty requires us and other national regulators to have regard to the desirability of promoting economic growth, alongside our other statutory duties. As part of this duty we are carrying out an assessment of the financial impacts of these proposed new and revised standard rules permits. You can help us to determine these impacts and inform our decision making by responding to question 52 below.

1. Are there any other significant financial impacts, either positive or negative, that the introduction of the new or revised standard rules could have on your overall business? We do not intend to publish information provided to this question as part of our response to this consultation. Please specify which permit(s) your comments relate to.

Please use this section if you wish to provide any further information or details relating to this consultation.

1. Please use the box below if you have any further comments or observations that you would like us to consider as part of this consultation.