



# Consultation document

## **Waste batteries: appropriate measures for permitted facilities**

Date: June 2025

We are the Environment Agency. We protect and improve the environment.

We help people and wildlife adapt to climate change and reduce its impacts, including flooding, drought, sea level rise and coastal erosion.

We improve the quality of our water, land and air by tackling pollution. We work with businesses to help them comply with environmental regulations. A healthy and diverse environment enhances people's lives and contributes to economic growth.

We can't do this alone. We work as part of the Defra group (Department for Environment, Food & Rural Affairs), with the rest of government, local councils, businesses, civil society groups and local communities to create a better place for people and wildlife.

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[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

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# Purpose and scope of consultation

We would like your views on the proposed technical guidance that sets out the appropriate measures for permitted facilities that store or treat separate collections of waste batteries.

The purpose of the guidance is to:

- set out clear standards for the design and operation of permitted facilities that store or treat separate collections of waste batteries
- ensure that these standards are applied consistently across the waste sector to protect the environment.

The guidance also incorporates the relevant requirements of the waste treatment Best Available Techniques (BAT) Conclusions publication, made under the European Industrial Emission Directive (2010/75/EU), which apply to waste installation facilities permitted under the Directive.

## Previous engagement

We shared an early pre-consultation version of the draft guidance with key stakeholders and trade associations from the waste sector in December 2024. We have used the initial comments received to prepare this version of the draft guidance for formal consultation.

## Start and end dates of consultation

This consultation runs for 12 weeks from 16<sup>th</sup> June 2025 until midnight on 8<sup>th</sup> September 2025.

## How to respond

You can view the consultation and supporting documents on Citizen Space, which is the Environment Agency's consultation website.

The consultation will close on 8<sup>th</sup> September 2025. We will consider all responses received by this date before finalising our guidance.

Please submit your response on Citizen Space, as this provides an easy and efficient way to respond. It will also help us to:

- gather all responses in one place
- summarise responses quickly and accurately
- reduce the cost of the consultation

## Responding by email

If you prefer, you can submit your response by email using the response form, which you will find under the 'Related' section of the consultation on Citizen Space. Please email your response form with the subject header of 'Waste batteries: appropriate measures for permitted facilities' to [wastetreatment@environment-agency.gov.uk](mailto:wastetreatment@environment-agency.gov.uk)

## Ask for a copy of the consultation document

Contact us if you would like a copy of the consultation document sent to you. You can do this by emailing [wastetreatment@environment-agency.gov.uk](mailto:wastetreatment@environment-agency.gov.uk).

## How we will use your information

The Environment Agency will make all responses publicly available during and after the consultation, unless you have specifically requested that we keep your response confidential.

We will not publish names of individuals who respond.

Throughout the consultation we will make all comments (excluding personal information) publicly available on our Citizen Space website. This includes comments received online, by email and by post, unless you have specifically requested that we keep your response confidential. We will not publish names of individuals or personal data. But we will publish the name of the organisation for those responses made on behalf of organisations.

We will not respond individually to responses. After the consultation has closed, we will publish a summary of the responses on our website and contact you to let you know when this is available.

In accordance 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.

## 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 telling you when we've published the summary of responses, please provide your email address with your response.

By giving us 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 clear and full consent, unless required to do so by law.

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

The Environment Agency is the data controller for the personal data you provide. For more information on how we deal with your personal data please see our personal information charter on GOV.UK.

You can email our Data Protection team: [dataprotection@environment-agency.gov.uk](mailto:dataprotection@environment-agency.gov.uk).

## Consultation principles

We are running this consultation in accordance with the guidance set out in the government's [consultation principles](#). If you believe the consultation has not been run in accordance with the Principles, please email: [consultation.enquiries@environment-agency.gov.uk](mailto:consultation.enquiries@environment-agency.gov.uk).

Otherwise, for all other queries or complaints relating to this consultation please email: [wastetreatment@environment-agency.gov.uk](mailto:wastetreatment@environment-agency.gov.uk).

## Publishing our consultation response

We aim to publish our response to the consultation on GOV.UK within 12 weeks of this consultation closing and before we finalise the guidance. A link to this document will be added to the consultation page of Citizen Space.

The consultation response document will provide a summary of the consultation responses received and how we have taken them into account when finalising our waste batteries appropriate measures guidance for publication.

## About you

We would like to keep you informed about the outcomes of this consultation. For further information on privacy and how we will use your information please refer to the 'Responding to this consultation' section above.

**If you would like to receive emails acknowledging your response and or telling you when we have published the summary of responses, please select from:**

- yes, I would like to receive an email acknowledging my response
- yes, I would like to receive an email to let me know the consultation response document is published

If you have selected any of the above, please tell us your email address:

**Can we publish your response? We will not include personal information.**

This is a required question, please tick one of the following:

- yes
- no

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

To help us analyse and assess the consultation responses, we would like you to answer a few questions about:

- you or your organisation
- your business

**Please tell us if you are responding as an individual or on behalf of an organisation or group. Select one answer only from the following options:**

- a) responding as an individual
- b) responding on behalf of an organisation or group
- c) other

If you selected (b), please tell us the name of your organisation or group:

If you selected (c) 'other' please specify:

**If you responded on behalf of an organisation or group, how many employees work in the organisation or group?**

- sole trader
- 0 to 10
- 11 to 50
- 51 to 100
- 101 to 1,000
- more than 1,001

**Please tell us how you found out about this consultation:**

- from Environment Agency
- from another organisation
- through an organisation, group or trade association you are a member of
- press article
- social media, for example, Facebook, LinkedIn
- through a meeting you attended
- other (please specify below)



# Consultation questions

## When appropriate measures apply

**Q1. Is the introduction in section 1 clear about the scope of the guidance and the types of facility the guidance applies to?**

Please tick the relevant box

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer.

**Q2. The guidance includes generic appropriate measures that apply to the management of other similar wastes (e.g. waste electrical and electronic equipment (WEEE), hazardous chemicals and containerised wastes), along with additional specific measures for waste batteries. This was done so that the guidance includes the key measures that will apply to a waste batteries facility and reduce the need to refer out to other waste appropriate measures guidance. Do you agree with this approach?**

Please tick the relevant box

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer.

## General management appropriate measures

**Q3. Section 2.1, management system, is largely generic to all types of waste treatment. Is there anything included here that is irrelevant for waste batteries?**

Please tick the relevant box

- ☐ Yes
- ☐ No

☐ Don't know

Please explain your answer.

**Q4. Is there anything additional that should form part of the management system for a waste batteries storage or treatment facility?**

Please tick the relevant box

☐ Yes

☐ No

☐ Don't know

Please explain your answer.

**Q5. Sections 2.3 on accident management plans and 2.4 on accident prevention are based on generic requirements across the waste treatment sector. Do they adequately address the main accident risks likely from a waste batteries facility?**

Please tick the relevant box

☐ Yes

☐ No

☐ Don't know

Please explain your answer.

**Q6. A key issue in the waste sector is fires associated with the storage and handling of waste batteries, particularly lithium-ion batteries. Are there any additional fire prevention or control measures that should be referred to in the guidance regarding the storage, handling or treatment of separate collections of waste batteries?**

Please tick the relevant box

☐ Yes

☐ No

☐ Don't know

Please explain your answer.

### **Waste pre-acceptance, acceptance and tracking appropriate measures**

**Q7. Waste batteries are more readily characterised than some other wastes but there is still a need to undertake pre-acceptance assessments so that treatment and transfer facilities fully understand the nature of the wastes they are receiving. Do you agree the information requirements in section 3.1 achieve this?**

Please tick the relevant box

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer.

**Q8. Do you agree the requirements set out in section 3.2 on acceptance and section 3.3 on waste tracking are appropriate measures for a waste batteries facility?**

Please tick the relevant box

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer.

### **Waste storage and handling appropriate measures**

**Q9. The section on storage and handling includes appropriate measures regarding the type and properties of containers and packaging used for the storage and handling of waste batteries, including specific requirements for different types of batteries and containers. Do you agree that these requirements are appropriate?**

Please tick the relevant box

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer.

**Q10. Do you agree that lead acid batteries should be kept in appropriate battery boxes, or other similar rigid lidded containers, in order to prevent and minimise the risk of damage and potential emissions (including leakage of battery electrolyte or other hazardous substances) during storage, handling and transfer activities?**

Please tick the relevant box

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer.

**Q11. Are flexible intermediate bulk containers (FIBCs) appropriate for the safe storage and handling of certain types of batteries (for example, limited to smaller portable batteries that do not contain liquids or flammable substances, as currently set out in the guidance), or should all batteries be stored and handled in rigid containers or other appropriate protective packaging?**

Please tick the relevant box

- ☐ Yes – FIBCs may be appropriate
- ☐ No – other containers/packaging should be used instead
- ☐ Don't know

Please explain your answer.

**Q12. Facilities storing or treating waste batteries must have an appropriate fire prevention plan in place and maintain appropriate separation distances between (and within) waste battery storage areas. The draft guidance has not included any specific separation distances for waste batteries, as these may vary depending upon the type and quantities of waste being stored and site-specific factors. Do you agree with this approach?**

Please tick the relevant box

- ☐ Yes
- ☐ No
- ☐ Don't know

**If not, are there any recommended separation distances, or other measures, that should be referred to or included in the guidance (for example, for storage areas containing lithium-ion or other batteries)?**

**Q13. The guidance proposes maximum storage times for different types of waste batteries and other wastes. They have largely been based upon the maximum storage times provided in other waste sector appropriate measures guidance and existing environmental permits. Do you agree that the timescales provided for the wastes are appropriate, for example, considering the time it may take to accumulate a viable load of batteries for transfer or treatment?**

Please tick the relevant box

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer.

**Q14. Sections 4.1 and 4.2 set out generic and waste specific storage and handling requirements for waste batteries. Other than the issues raised in questions 9 to 13, do you agree that the other requirements are appropriate measures for waste battery storage?**

Please tick the relevant box

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer.

### **Waste treatment appropriate measures**

**Q15. Section 5.1 relates specifically to the preparation or pre-treatment of batteries for re-use or treatment. Do you think additional measures should be included for this activity?**

Please tick the relevant box

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer.

**Q16. There has been considerable engagement between the Environment Agency and industry concerning persistent organic pollutants (POPs) in waste. We have published guidance on how to [Identify and classify waste containing POPs](#) and [Manage waste lead acid batteries containing POPs](#). Does section 5.4, in conjunction with the guidance already published on GOV.UK, provide sufficient guidance on the management of POPs in waste batteries?**

Please tick the relevant box

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer.

**Q17. Other than the specific issues raised in questions 15 and 16, do you agree the other requirements set out in section 5 are appropriate measures for the treatment of waste batteries?**

Please tick the relevant box

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer.

### **Emissions control appropriate measures**

**Q18. Section 6 outlines a range of measures that must be used to control emissions to the environment. Not all will be applicable to all facility types. Do you agree this**

**includes all the measures that are likely to be relevant to the full range of battery facilities?**

Please tick the relevant box

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer.

### **Emissions monitoring and limits appropriate measures**

**Q19. Section 7 sets out the emissions monitoring requirements and limits for waste battery facilities and lists substances, limits and monitoring methods that are likely to be relevant. Not all will be applicable to all facility types. Do you agree this includes all the measures and substances that are likely to be relevant to the full range of battery facilities?**

Please tick the relevant box

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer.

**Q20. We really value your feedback on the proposed guidance. Please tell us if you have any further comments and provide as much information as possible to support your answer.**

# Would you like to find out more about us or your environment?

Then call us on

03708 506 506 (Monday to Friday, 8am to 6pm)

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Find out about call charges (<https://www.gov.uk/call-charges>)

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