Response form

Waste batteries: appropriate measures for permitted facilities

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| Your details |
| 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 or group.  Please select from the following options:  £ Responding as an individual  £ Responding on behalf of an organisation or group  £ Other  If you're responding on behalf of an organisation or group, please tell us who you are responding on behalf of and include its type e.g. business, environmental group.  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  If you selected other, please specify.  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  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 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](https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fgovernment%2Forganisations%2Fenvironment-agency%2Fabout%2Fpersonal-information-charter&data=05%7C01%7CConsultation.enquiries%40environment-agency.gov.uk%7C7859ec10fa6c425aef1a08db7bcd8b4b%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638239894958495932%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=WmfcmMkGJffAwCHhG1LJFncn5snJlVeQkW%2BImM4tJ5w%3D&reserved=0) on GOV.UK.  You can email our Data Protection team: [dataprotection@environment-agency.gov.uk](mailto:dataprotection@environment-agency.gov.uk).  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Please tell us if you would like to (tick all that apply):  £ Receive an email acknowledging your response  £ Receive an email to let you know that the summary of responses has been published  If you have ticked any of the boxes above, please provide us with your email address:  Email:  £ Put a cross in this box if you are requesting non-disclosure of your response.   Please provide an explanation to support your request. |

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| Please tell us how you found out about the Waste batteries appropriate measures 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)  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

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, post and by fax, 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 consultation response document on GOV.UK in which we will publish the name of the organisation for those responses made on behalf of organisations 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.

Returning your response

Your response to this consultation needs to be returned by 8th September 2025.

We would like you to use this form if you are not submitting your response online. You can return it by email to [wastetreatment@environment-agency.gov.uk](mailto:wastetreatment@environment-agency.gov.uk). Please use this email address if you have any questions regarding this consultation.

Or by post to:

Peter Chesney

Environment & Business

Environment Agency

Scarrington Road

Nottingham

NG2 5FA

We welcome your views on Waste batteries: appropriate measures for permitted facilities

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| 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. | |

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| Q2. The guidance includes generic appropriate measures, that applies 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. | |

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| |  |  | | --- | --- | | 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. | | |

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| 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. | |

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| 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. | |

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| 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. | |

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| 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. | |

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| 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. | |

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| Waste storage and handling appropriate measures | |
| Q9. The sections 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. | |

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| 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. | |

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| Q11. Are flexible IBCs 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. | |

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| 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)?  Please explain your answer. | |

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| 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. | |

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| Q14. Sections 4.1 and 4.2 set out both generic and waste specific storage 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. | |

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| 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. | |

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| 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](https://www.gov.uk/guidance/identify-and-classify-waste-containing-persistent-organic-pollutants-pops) and [Manage waste lead acid batteries containing POPs](https://www.gov.uk/guidance/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. | |

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| 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. | |

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| 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. | |

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| 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. | |

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| 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. |