

Section 1a – Discussions before your application

The application for a permit variation was discussed by the site Area Officer (Mr John Bullers) and the Dimlington terminal Manager (Mr Phillip Shaw). It was advised that a permit variation was to be submitted to authorise the proposed change, details of this are captured in CAR PP3237CR/0497842.

Perenco UK Limited also utilised the Environment Agency Enhanced Pre-Application service and had several correspondences (teams meeting and emails) with Francesco di Stefano and Kirstie Lythgo.

A teams meeting was held on 19th June 2025 with Francesco di Stefano, John Bullers, Jake Currier (PUK Legal advisor) and Nicholas Abraham (PUK Environmental advisor) to discuss the proposed changes and the additional information requested by the permitting team following the return of the previous applications as 'not duly made'.

August 21, 2025 – An email was sent to Francesco requesting for guidance on if the application can be submitted while waiting for additional sampling data to be available to update the H1 risk assessment as it was completed using 10 discharge sample results and 1 background concentration data.

September 4, 2025 – An email was received from Francesco recommending PUK collect at least additional 2 effluent sample before submitting the application. It was also recommended a minimum of 12 background data samples be used for the assessment or assume the background to be 50% of the relevant EQS/PNEC.

September 9, 2025 – An email was sent to Francesco requesting clarity on whether it was the input/influent in the treatment system or the final output from site that needs to be characterised as hazardous or non-hazardous waste.

September 16, 2025 – Francesco sent an email confirming it is the untreated water (i.e. the influent water to the treatment plant) that will be characterised for the purpose of determining the type of activity (whether hazardous or non-hazardous waste treatment for disposal) and that the Enhanced Pre-application service was now closed.

October 6, 2025 – An email was sent to Francesco on how to complete the requested waste characterisation as none of the online tools for waste characterisation accounts for PFAS/PFOS, the email was subsequently forwarded to Kirstie Lythgo as an out of office notification was received for Francesco's email.

October 7, 2025 – An email was received from Kirstie stating our query had been discussed and it is considered that it is unlikely to be straightforward to provide a quick 'follow up' response to a pre-application case that has now closed. Perenco should therefore submit a new enhanced pre-application query, which will allow time to consult specialist internal teams to ensure they provide us with the correct advice.

October 22, 2025 – An email was received from Kirstie Lythgo with advice related to the query of 6th October 2025 with a deadline of 29th October 2025 to confirm if the advice/response provided answers PUKs query, else a final response will be provided, and the pre-application service will be closed.

November 14, 2025 – An email was received from Kirstie Lythgo containing advice on waste classification and assessment and also a request for EPR/PP3237CR/P005 be used as pre-application reference number.