

Document 2 MANAGEMENT SYSTEM SUMMARY

Bespoke Environmental Permit Application

Areera Ltd

Area E5 Multipark Stanton

Bury St Edmunds, Suffolk IP31 2BG

Existing T11: EXP/RS3895UF

Document purpose

This Management System Summary has been prepared to support Areera Ltd's application to the Environment Agency for a bespoke environmental permit for the proposed site at Area E5 Multipark Stanton, Bury St Edmunds, Suffolk IP31 2BG. The proposed permitted activity is restricted to the receipt and storage of waste refrigeration equipment (fridges and freezers), with no treatment, dismantling, degassing or processing undertaken at this site.

1. Site and operator overview

- Operator: Areera Ltd.
- Site: Area E5 Multipark Stanton, Bury St Edmunds, Suffolk IP31 2BG.
- Existing regulatory position: the site currently operates under T11 exemption reference EXP/RS3895UF.
- Proposed activity: storage of waste refrigeration equipment only.
- The bespoke permit will be managed through Areera Ltd's overall environmental and operational management arrangements and will be operated in conjunction with the requirements applicable under RPS 375, where its conditions are met.

2. Scope of the management system

The management system applies to all activities associated with the permitted storage of waste temperature exchange equipment (WTEE), including site access, receipt, inspection, acceptance, safe unloading, storage, stock control, dispatch, housekeeping, emergency response, maintenance, training, record keeping and compliance monitoring.

The site will not undertake:

- Degassing or refrigerant recovery.
- Dismantling or depollution of refrigeration equipment.
- Treatment or processing of WEEE.
- Crushing, compaction or other mechanical treatment.
- Removal of compressors, oils, refrigerants or other components.

3. Waste acceptance and storage controls

Waste will only be accepted where it is within the scope of the environmental permit and the site's waste acceptance procedures. Loads will be checked on arrival and records maintained. Waste that is

not permitted, incorrectly described or presents an unacceptable environmental or safety risk will not be accepted and will be managed through the company's rejection procedure.

- Fridges and freezers will be handled carefully to prevent damage to cooling circuits, compressors, casings and foam insulation.
- Appliances will be kept upright wherever practicable and will not be tipped or handled in a manner likely to damage cooling circuits.
- Storage areas will be clearly defined and controlled.
- Different waste streams will be appropriately segregated and identified.
- Maximum storage quantities and storage periods will be controlled through stock records and routine inspections.
- Waste will be dispatched to appropriately authorised downstream facilities.

4. RPS 375

Areera Ltd intends to manage the bespoke permit alongside RPS 375, where the Regulatory Position Statement applies. RPS 375 concerns temporary storage of waste temperature exchange equipment in response to national treatment capacity constraints. It does not remove the legal requirement to hold an environmental permit where one is required, nor does it remove the requirement to comply with permit conditions. Areera will therefore monitor the RPS requirements and ensure that any reliance upon the RPS is demonstrably within its stated conditions.

5. Environmental risk controls

Risk	Primary controls
Damage to refrigeration equipment	Careful unloading, upright storage where practicable, controlled handling and routine inspections.
Release of refrigerant or oil	Prevent damage to cooling circuits; inspect damaged appliances; isolate and escalate incidents immediately.
Fire	Maintain clear storage arrangements, housekeeping, access for emergency services and appropriate separation in accordance with the approved site arrangements and applicable RPS requirements.
Pollution to land or drainage	Maintain the site in a clean condition, control spills, use suitable spill response equipment and prevent contaminated liquids entering drainage.

Incorrect waste acceptance	Pre-acceptance information, arrival checks, documentation and rejection procedures.
Excessive storage	Stock monitoring, defined capacity limits, planned onward movement and escalation where capacity or storage periods approach limits.
Uncontrolled access	Site security, controlled access and supervision of waste deliveries.

6. Site operations

Start-up

Before commencement, the site infrastructure, storage areas, signage, emergency equipment, drainage arrangements, security and staff competence will be checked. The permit and management system requirements will be communicated to relevant personnel.

Normal operation

All incoming WTEE will be recorded, inspected and stored in accordance with the site procedures. Routine inspections will identify damage, leaks, housekeeping issues, storage capacity and any non-conformances.

Dispatch

Waste will be released only to appropriately authorised recipients. Transfer documentation and relevant records will be retained.

Shutdown

The site will be left secure, clean and free from uncontrolled waste or pollution risks. Any outstanding environmental issues will be addressed before closure or cessation of operations.

7. Accident and incident management

Areera will maintain an accident and incident procedure covering spills, damaged refrigeration equipment, fire, loss of containment, equipment failure, unauthorised waste, excessive storage and other events that could cause environmental harm. Incidents will be reported to the responsible manager, contained where safe to do so, investigated and recorded. Where required, the Environment Agency and other relevant authorities will be notified in accordance with permit conditions and regulatory requirements.

8. Contingency arrangements

Contingency arrangements will cover disruption to waste outlets, equipment failure, restricted site access, extreme weather, fire or other emergency conditions. Incoming waste will be controlled if normal storage or dispatch arrangements are unavailable. Where RPS 375 is being relied upon, its capacity, separation, drainage and other applicable conditions will be checked before continued use.

9. Inspection, maintenance and housekeeping

The site will be subject to documented routine inspections. Inspections will cover storage arrangements, waste identification, damage to appliances, housekeeping, access routes, drainage, security, emergency equipment and evidence of leakage or pollution. Defects will be recorded and corrective actions assigned. Site infrastructure and equipment will be maintained in accordance with manufacturer recommendations and the company's maintenance arrangements.

10. Competence and training

Personnel undertaking waste acceptance, handling, storage, inspection or dispatch activities will receive appropriate instruction and training. Training will cover the permit requirements, waste acceptance, safe handling of WTEE, environmental risks, spill response, fire awareness, incident reporting, RPS 375 requirements where applicable and record keeping. Competence and training records will be maintained.

11. Records and document control

- Waste acceptance and rejection records.
- Waste transfer and consignment documentation, as applicable.
- Stock and storage records.
- Inspection and housekeeping records.
- Incident, accident and complaint records.
- Maintenance records.
- Training and competence records.
- Environmental compliance checks and corrective actions.
- Records demonstrating compliance with RPS 375 where it is relied upon.

Controlled documents will be reviewed when the permit, legislation, regulatory guidance, site activities or risk profile changes. Superseded documents will be withdrawn from operational use.

12. Complaints

Any environmental complaint relating to the site will be recorded, investigated and assessed by the responsible manager. Appropriate corrective action will be implemented and the outcome recorded. Trends will be reviewed as part of management system reviews.

13. Compliance monitoring and management review

Areera will undertake periodic compliance checks against the environmental permit, management system, site procedures and any applicable regulatory position statements. Findings will be recorded and corrective actions tracked to completion. The management system will be formally reviewed at least annually and sooner where there is a significant operational change, permit variation, incident, complaint, breach or change in regulatory requirements.

14. Site closure

If the permitted activity ceases, Areera will remove or lawfully transfer remaining waste, ensure the site is clean and secure, address any pollution risks and retain required records. Any surrender or regulatory requirements will be managed in consultation with the Environment Agency.

15. Management commitment

Areera Ltd is committed to operating the site in accordance with its environmental permit, applicable legislation, Environment Agency guidance and the conditions of RPS 375 where relied upon. The company will provide appropriate resources, competent personnel, procedures and monitoring to prevent pollution and ensure that waste is managed safely and responsibly.

Regulatory basis and reference documents

- Environment Agency – Develop a management system: environmental permits.
- Environment Agency – Waste temperature exchange equipment: appropriate measures for permitted facilities.
- Environment Agency – RPS 375: Temporary waste temperature exchange equipment (WTEE) storage due to national treatment capacity constraints.
- Areera Ltd site-specific environmental risk assessment and associated site plan (supporting application documents).

Document status: Draft for bespoke permit application support

Prepared for: Areera Ltd

Site: Area E5 Multipark Stanton, Bury St Edmunds, Suffolk IP31 2BG

Existing T11 reference: EXP/RS3895UF

Date: 25 August 2026

16. Site management, COTC coverage and operating hours

The site will operate under Areera Ltd's management system and will have defined management and technical oversight. COTC coverage will be provided by Craig Thompson. Weekly visits will provide management oversight, review of site conditions, compliance with the permit and appropriate measures, inspection of storage arrangements, review of records and identification of any corrective actions required.

The site will initially operate Monday to Friday, 08:00 to 16:00. These operating hours may be amended in the future to reflect operational requirements and business needs. Any material change in operating arrangements will be assessed through Areera's management system to ensure that appropriate staffing, competence, supervision, environmental controls and permit requirements continue to be met.

17. Customer-specific storage arrangements

The initial customers expected to use the Bury St Edmunds facility for the storage of waste refrigeration equipment are ERP, ENVA and Mulberry. Waste received from these customers will be recorded and managed so that the fridges/freezers remain identifiable by customer and are stored in accordance with the applicable waste acceptance, tracking, segregation, handling and storage requirements.

Customer-specific records will be maintained to provide traceability of incoming loads, quantities received, storage location where appropriate, dates of receipt and onward transfer. The site will maintain sufficient information to demonstrate that waste is being managed in accordance with the environmental permit and the applicable Environment Agency appropriate measures.

18. Storage period and RPS 375 contingency

Areera's normal operating objective is for fridges and freezers to be stored at the site for no longer than 3 months before onward transfer. Storage duration will be monitored through site records so that equipment approaching the three-month limit is identified and prioritised for transfer.

If operational circumstances require storage beyond the normal three-month period, Areera will assess whether the current RPS 375 applies and, where appropriate, action the RPS in accordance with all of its conditions. The Environment Agency officer will be contacted where advice or clarification is required, particularly where there is uncertainty regarding the applicability or conditions of the RPS. Any reliance upon RPS 375 will be documented and supported by records demonstrating compliance with its requirements.

19. WEEE and WTEE appropriate measures

The facility will manage fridges and freezers as waste temperature exchange equipment (WTEE) and will follow the Environment Agency's appropriate measures for WEEE and the additional appropriate measures applicable to WTEE. These requirements include protecting cooling circuits, compressors, appliance casings and insulation foam from damage; avoiding tipping; maintaining safe and stable storage; providing appropriate access for inspection and handling; and controlling the storage period.

The site will not undertake degassing or treatment of the refrigeration equipment. Appliances will be transferred to an appropriately authorised downstream facility for treatment in accordance with the applicable regulatory requirements.

20. Management review and continuous improvement

The management system will be reviewed periodically to confirm that it remains effective and reflects actual site operations, customer requirements, permit conditions and current Environment Agency guidance. The weekly COTC visit will provide an important operational compliance check, while formal management review will consider incidents, complaints, inspections, storage durations, customer volumes, regulatory changes, RPS requirements and opportunities for improvement.

21. Key Environment Agency guidance considered

Environment Agency – Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities.

Environment Agency – Waste temperature exchange equipment: appropriate measures for permitted facilities.

Environment Agency – RPS 375: Temporary waste temperature exchange equipment (WTEE) storage due to national treatment capacity constraints.

The management system will be reviewed against current versions of these documents and any subsequent revisions issued by the Environment Agency.

Revision note: Updated to include COTC site coverage, initial operating hours, anticipated customers, customer-specific storage arrangements, three-month storage objective and contingency use of RPS 375.

22. Incoming transport, weighing and waste documentation

Fridges and freezers will be delivered to the Bury St Edmunds facility by different hauliers. All incoming loads will be managed through the site waste acceptance procedure. Vehicles will use a calibrated weighbridge so that the quantity of waste received can be accurately recorded.

Each load will arrive with the appropriate completed waste documentation, including consignment notes and hazardous waste documentation where applicable. Documentation will be checked against the physical load and recorded weight before acceptance. Any discrepancies, incomplete documentation or waste that does not meet the site acceptance criteria will be managed through the site rejection and non-conformance procedure. The digital waste tracking system will be implemented from 1st October 2026.

23. Daily stock reporting and inventory control

The number and quantity of fridges stored at the site will be monitored daily and reported to Areera Ltd's Head Office at Elland Road. This daily reporting will provide management oversight of site stock levels and storage capacity.

A full inventory of all incoming and outgoing fridges will be maintained. Records will provide traceability of customer, date received, quantities received, quantities dispatched and the resulting stock held on site. The inventory will also be used to monitor storage duration and ensure that appliances are managed within the normal three-month storage period, unless the applicable requirements of RPS 375 are being used.

24. Site infrastructure, drainage and pollution prevention

Fridges and freezers will be stored on an impermeable surface. Drainage serving the storage area will be sealed so that any potentially contaminated liquid cannot enter uncontrolled surface water drainage. The condition of the storage surface and drainage arrangements will form part of routine site inspections.

Fully stocked spill kits will be installed at suitable locations and kept readily available. Staff will be trained in spill response and the reporting of leaks or damaged refrigeration equipment. Any spill or loss of containment will be contained, cleaned up and recorded in accordance with the site incident procedure.

25. Fire prevention and emergency equipment

Appropriate fire-fighting equipment, including suitable fire extinguishers, will be installed and maintained at the site. Fire-fighting equipment, emergency access and escape routes will be kept clear and accessible. Fire controls will be managed in accordance with the site fire risk assessment, Fire Prevention Plan and the requirements of the environmental permit and applicable Environment Agency guidance.

26. Forklift operation and maintenance

Gas-powered forklift trucks (FLT's) will be used where required for the controlled movement of refrigeration equipment. All forklift drivers will be appropriately trained and competent for the equipment and tasks they undertake. Handling methods will minimise the risk of damage to appliance casings, cooling circuits, compressors and insulation.

All forklifts will be subject to planned servicing, inspection and maintenance. Maintenance and inspection records will be retained, and defects that could affect safe or environmentally responsible operation will be addressed before the equipment is returned to service.

27. Staff induction, waste acceptance and WTEE training

All staff working at the facility will receive site induction training before undertaking operational duties. Induction will include the environmental permit requirements, site rules, waste acceptance procedures, waste documentation, correct storage and handling of fridges and freezers, emergency arrangements, spill response, fire awareness, housekeeping and incident reporting.

Staff involved in the receipt, movement, inspection or storage of refrigeration equipment will also receive specific Waste Temperature Exchange Equipment (WTEE) training. This will cover the environmental risks associated with refrigeration equipment, prevention of damage to cooling circuits and compressors, identification and management of damaged appliances, correct storage arrangements, storage duration controls and the actions required where a leak or other environmental issue is identified.

Training, induction and competency records will be maintained and reviewed to demonstrate that staff remain competent for the duties they undertake.

28. Compliance with WEEE and WTEE appropriate measures

The site will operate in accordance with the applicable WEEE requirements, Environment Agency WEEE appropriate measures and the additional Waste Temperature Exchange Equipment appropriate measures for permitted facilities. Areera will maintain procedures covering waste acceptance and tracking, weighing and record keeping, impermeable surfacing and sealed drainage, safe storage and handling, trained staff, equipment maintenance, spill response, fire controls and routine inspection.

The management system and site procedures will be reviewed against current Environment Agency guidance and any permit-specific conditions so that changes in regulatory requirements can be incorporated into site operations.

Revision note: Updated with haulier and weighbridge controls, waste documentation requirements, daily Head Office stock reporting, full fridge inventory controls, impermeable surfacing and sealed drainage, spill and fire equipment, forklift competence and maintenance, and staff induction/WTEE training.

28. Site security and out-of-hours controls

The open storage yard, which is approximately 5 acres, will be protected by CCTV coverage to provide monitoring of the open storage area and the perimeter of the Areera site. A secure site cabin will also be provided as part of the site security arrangements. CCTV arrangements will be maintained and reviewed as part of the site management system to support the prevention and detection of unauthorised access and other security incidents.

As part of Areera Ltd's planned development for 2027, the company intends to occupy approximately 100,000 square feet of units at the site. The planned security and fire protection arrangements for these units will include intruder alarms, fire detection/protection systems and CCTV coverage. The final arrangements will be incorporated into the site management system, fire risk assessment and relevant site procedures as the development is implemented.

Forklift truck keys will be removed from the equipment at the end of operations and locked securely in a designated key safe overnight. Access to keys will be restricted to authorised personnel.

No equipment will be left charging overnight or at any time when the building or operational area is not occupied by Areera personnel. Any equipment requiring charging will only be charged while authorised Areera personnel are present, in accordance with the company's fire prevention and equipment safety arrangements. The FLT's used on site will be gas-powered.

Security, CCTV, access control, key control, fire protection and equipment charging arrangements will be included within routine site inspections. Any defects or failures that could affect site security, fire prevention or environmental protection will be recorded and corrective action taken.

30. External and future internal fridge storage

Initially, fridges and freezers will be stored outside within the designated open storage area. External storage will be managed in accordance with the applicable Environment Agency appropriate measures

and the approved site arrangements, including controls for impermeable surfacing, sealed drainage, safe handling, inspection, security and fire prevention.

Areera plans to introduce internal fridge and freezer storage during 2027 as additional units at the site become occupied. Before internal storage begins, the relevant storage layout, capacity, fire prevention, security, drainage, operational controls and permit requirements will be reviewed and incorporated into the management system and site procedures.

31. Food and drink waste acceptance checks

All fridges and freezers will be checked for food, drink and other residual contents before unloading and final acceptance at the site. This check will form part of the waste acceptance procedure and will be recorded where required.

Where food or drink waste remains within an appliance, the load or affected appliances may be rejected and will not be accepted into storage until the issue has been appropriately resolved. Rejected loads will be managed in accordance with the site rejection procedure, with the reason for rejection recorded and communicated to the customer or haulier as appropriate.

Revision note: Operating hours amended to 08:00-16:00; site FLT's confirmed as gas-powered; external fridge storage arrangements and planned internal storage for 2027 added; and pre-unloading checks for food and drink waste, including rejection controls, incorporated into the waste acceptance procedure.