

12th May 2026

Environment Agency
Permitting Support Centre
Quadrant 2
99 Parkway Avenue
Sheffield
S9 4WF

Dear Sir/Madam,

**APPLICATION FOR A SUBSTANTIAL VARIATION TO THE ENVIRONMENTAL PERMIT – BJ7611IY/V010
BARROW PAPER MILL**

Please find enclosed documentation in support of an application for a SUBSTANTIAL variation to an existing environmental permit (V010) for the Barrow Paper Mill operated by Kimberly-Clark Limited (KC).

The existing permit covers many activities including the operation of two tissue manufacturing machines – TM3 and TM5 and a number of Converting Lines.

This application for a SUBSTANTIAL variation to the existing permit is to cover the following:

- The installation of a new boiler plant which will replace the existing boiler plant for the provision of steam to satisfy the existing site steam demand. The new boiler plant will be located within an existing refurbished building which currently contains redundant standby boilers. New connections for fuel supply (natural gas/hydrogen) and steam/condensate will be required.
- The new boilers will have dual-fuel capability. Natural gas (as current) and hydrogen provided from a new dedicated pipeline from a 3rd party facility to be located approximately 400m south of the existing site.
- The new boiler plant emission points are to be designated as AB7/AB8 & AB9.
- The current permit includes emission point AB6 which is associated with one of the redundant standby boilers. This emission point can be removed from the permit.
- There will be no change to the operation of the existing tissue machines and converting lines in the existing Mill.
- At this stage the existing boiler plant is to remain in the permit.

Full details are presented in the Technical Package of information (KC- EPR V012) and Appendices which accompany this variation request.

Note: Variation request V011 is for a NORMAL variation to include additional emission points from the existing Converter Line operations for the use of fragrances in the existing permit V010. This variation request was submitted in March 2026.

Pre-Application Discussions

A request for Enhanced Pre-application advice was submitted in January 2026 (EPR/ BJ7611IY/P002). (Note: the Enhanced Pre-application request at this stage also covered the Fragrance Lines before it was decided to apply for a variation for the Fragrance Lines separately – submitted on 24 March 2026 – V011).

It should be noted that KC are currently proposing a similar boiler replacement project at their Northfleet site and sought Enhanced pre-application advice for this project in April 2024 (EPR/BJ7379IZ). The two projects are running concurrently and an application to vary the permit for the Northfleet site has recently been submitted.

Variation Application

The following information is provided:

- Form A;
- Form C2;
- Form C3;
- Form F1; and
- A Technical Information Report (KC - EPR V012). This information includes a project description, including details on new boiler plant systems, an environmental risk assessment, an evaluation of the impacts, details on the environmental management systems and a discussion on BAT. The report also includes a Non-Technical Summary and accompanying technical appendices.
- Air Quality Modelling Files.

Payment

Payment of £17,455.00 (See Form F1) is due to be made by BACS transfer.

This sum comprises £12,485.06 for a SUBSTANTIAL variation for the primary activity for the site which is the manufacture of paper & pulp. This is in accordance with the current Fees & Charges scheme - The Environment Agency (Environmental Permitting and Abstraction Licensing) (England) Charging Scheme 2022. Amendments up to 1 April 2026. Version: 1.9. – see Table 1.9 - Paper, pulp, carbon, tar and bitumen. Ref 1.9.1.

In addition this includes £808.60 for a Habitats Assessment (ref 1.19.2).

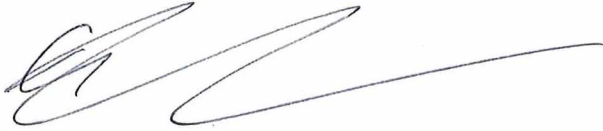
A fee of £4,161.34 for the removal of activity AR1 from the permit – see below. This is classified as a MINOR variation for the primary activity for the site- ref 1.9.1.

These costs have been discussed and agreed with the EA inspector during the Enhanced pre-application process.

The reference number for the payment is PSCAPPINSTKIMBE012. Please send a receipt for the payment to the undersigned.

In the event of queries arising during the determination process for the application for a variation to the existing environmental permit please do not hesitate to contact me for further clarification and information.

Yours faithfully,



Georgia Moore

EHS Manager – Barrow Paper Mill

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NB

As part of the variation process please amend the current permit to remove Activity AR1 in Table S1.1.

The de-inking plant is no longer operational and RCF is no longer processed on-site.

As a consequence of this the following text currently within the Introductory Note can also be amended to remove reference to RCF.

The products can be produced from imported virgin fibre and recycled fibre (RCF) which is processed in the site de-inking facility. The combination of virgin fibre and RCF, known as the furnish, can vary. We have included a range of limits in table S3.3 of this permit to encourage the use of RCF wherever possible.

Table S3.3 should also be amended to remove reference to the BAT-AELs for 25% RCF and 10% RCF.

In the Introductory Note please also remove 2004 from the following text. The current system is certified to ISO 14001:2015 and will soon transition to ISO 14001:2026.

The management system at the mill has certification to ISO 14001:2004 for paper manufacture and conversion, with initial certification being 15 December 2009.

