Recycling and recovery UK

Sidegate Lane

Battery Recycling Facility

1.5 Business Continuity and Contingency Plan

June 2025

General

Document Details

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Document Review History

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June 2025	Version 1.0	Original document

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1 Introduction

1.1 This document details how SUEZ will:

- Minimise the environmental impact of major changes to normal operations. Minor changes are covered as part of the site Operations and Emissions Management Plan (document reference 1.2) and Accident Prevention and Management Plan (document reference 1.4) and as part of SUEZ's standard maintenance and operational procedures; and
- Comply with Contract and Authority requirements (where relevant) in relation to business continuity and contingency planning.

1.2 The plan outlines an assessment of external and internal risks, the critical areas of the service and how they can be protected, how contingencies are arranged and how service can be recovered.

1.3 Details of specific roles and responsibilities are laid out as well as incident management plans, emergency action plans and all other related documents.

1.4 Although this document cannot detail every event and every scenario, broadly it will show SUEZ's site staff the steps to be taken in situations where business continuity is threatened, and contingency action is required.

1.5 This plan will be revised following each implementation of the Business Continuity and Contingency Plan (document reference 1.5) to incorporate learning and experience from planned and unplanned outage events.

1.6 The steps outlined in this document will be shared with relevant parties. This includes internal stakeholders (e.g., commercial teams and communications teams), external stakeholders (e.g., regulators) and third-party customers and clients (e.g., Local Authorities).

2 Critical Activities and Services

2.1 Introduction

2.1.1 This section details the key activities and services that could be affected by any of the scenarios outlined in the subsequent sections, including contractual, operational and commercial responsibilities.

2.2 Contractual

2.2.1 The site operates as a commercial facility accepting waste from commercial and industrial customers under the permit conditions.

2.2.2 The site does not operate under a local authority contract.

2.3 Operational

2.3.1 The site operates under Environmental Permit (permit) reference EPR/XP3092NX. The site is permitted to operate as an Open Windrow Composting (OWC) facility and a Transfer Station (TS)

facility, although the OWC activity is not currently operated. The permit will be varied to allow the operation of a battery recycling facility including treatment of lithium-ion batteries and lithium-ion battery materials, and storage and transfer of batteries of other chemistries and fluorescent tubes. The site will retain the ability to operate as a OWC and TS activities, however the site will operate solely as a battery recycling facility.

2.3.2 The following activities and processes are carried out at the facility:

- Waste pre-acceptance and acceptance.
- Unloading of waste, including lithium–ion batteries, lithium-ion battery materials, non lithium–ion batteries and fluorescent tubes.
- Storage of lithium-ion batteries and lithium–ion battery materials
- Storage and transfer of non-lithium batteries and fluorescent tubes.
- Treatment of lithium-ion batteries and materials including, as appropriate, discharging, dismantling, shredding and separation and sorting.
- Loading of batteries, fluorescent tubes and lithium-ion battery treatment outputs for further recovery.

2.3.3 The waste acceptance limit for the lithium-ion battery treatment operation is 20,000 tonnes per annum.

2.4 Commercial

2.4.1 The site is a key strategic location for SUEZ.

3 Risk Tables

3.1.1 The risk is determined by the probability of a hazard occurring and the likely consequences of any impact. The assessment of risk considers the residual risk that remains after implementation of the preventative measures.

3.1.2 Risk assessment definitions and the risk estimation matrix are presented in Appendix A.

External Risks

Hazard	Receptor	Harm	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	What is the overall risk?
Aviation crash	Site operations and infrastructure, transport routes, linked facilities	Physical damage to primary infrastructure (site), secondary infrastructure (transport routes, third party facilities), injury and death, impact on amenity control systems	Low	Medium	Medium	Although the site is not located near to any major airports, it is located near to a number of small airfields (Sywell Aerodrome 9km west, Bedford Aerodrome 16km southeast and Deenethorpe Airfield 10km north). There are multiple transport routes connecting site to customers and offtakes	In the event of a direct or close impact, incoming vehicles will immediately be diverted to an alternative facility. Contingency staff can be mobilised to the site to clear waste if needed. SUEZ's Gold Command incident response will be set up to manage an incident.	Low

Hazard	Receptor	Harm	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	What is the overall risk?
						Aviation incidents are very rare in the UK		
Train or tram crash	Transport routes, linked facilities	Physical damage to secondary infrastructure (transport routes, third party facilities), injury and death, impact on amenity control systems	Low	Medium	Medium	There is a railway line approximately 1.2km west of the site. A crash will not impact site infrastructure directly but may impact transport routes.	In the event of a rail crash impacting secondary infrastructure (nearby roads), then alternative (road) offtakes will be used. Other facilities can be used to alleviate the number of vehicles at site. In the event of the facility's operations being affected by loss of transport routes, then alternative routes and hauliers will be used.	Low
Bridge collapse or severe road accident	Transport routes, linked facilities	Physical damage to secondary infrastructure (transport routes, third party facilities)	Low	Low	Low	The site is located close to the A6, A45, A14 and A509 so major road accidents will affect transport to and from the site. However, there are multiple transport routes connecting site to customers and offtakes. Any disruption is likely to be for a short period.	In the event of a severe road crash affecting the area, then alternative (road) offtakes will be used depending on the situation. Other facilities can be used to alleviate the number of vehicles at site.	Low

Hazard	Receptor	Harm	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	What is the overall risk?
Storm or freak weather	Transport routes and site infrastructure	Physical damage to primary infrastructure (site), secondary infrastructure (transport routes, third party facilities), impact on amenity control systems	Low	Medium	Medium	The site is located in Flood Zone 1, which means it has a low probability of flooding However, storms and freak weather can affect transport links and potentially the site infrastructure.	Climate change risk assessment in place In the event of damage to the facility, an assessment will be made and if continued operations are not possible waste will be diverted to an alternative site. Offtake transport routes will be adapted as necessary.	Low
Seismic activity	Transport routes and site infrastructure	Physical damage to primary infrastructure (site), secondary infrastructure (transport routes, third party facilities)	Low	Low	Low	There has been no history of seismic activity in the area.	The site has been constructed in line with reasonably foreseeable risks.	Low
Protestor action	Transport routes and site infrastructure	Prevention of use of primary infrastructure (site), secondary infrastructure (transport routes, third party facilities)	Low	Medium	Medium	The site is not a high public interest facility. There has been no history of protestor action.	If protestor action focuses on the site or the surrounding area, then waste will be diverted to an alternative facility. If protestor action affects secondary infrastructure (transport links), then waste will be diverted to third party facilities	Low

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Hazard	Receptor	Harm	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	What is the overall risk?
Industrial action	Transport routes and site infrastructure	Prevention of use of primary infrastructure (site), secondary infrastructure (transport routes, third party facilities)	Low	Medium	Medium	There has been no history of industrial action.	Industrial action could prevent the use of the site and secondary infrastructure (primarily road links). If this is the case, then action will be taken to resolve the dispute but in the meantime, waste can be diverted to alternative facilities.	Low
Disease pandemic	Site operations	Illness and death	Low	High	Medium	A pandemic is an unlikely scenario but has the potential to affect multiple members of staff.	Government guidance will be followed, and SUEZ will ensure that appropriate PPE is in place. Staff from other locations can be used to provide cover. SUEZ's Gold Command incident response will be set up to manage the ongoing situation.	Medium
Loss of power	Site operations and infrastructure	Prevention of use of primary infrastructure (site), secondary infrastructure (transport routes, third party facilities)	Medium	Medium	Medium	Power supply is important for site operations as the site has fixed plant and power is used for office functionality, weighbridge use and lighting.	In the event of full power loss for a short period, then manual weighbridge operations would commence, and acceptance of waste can be undertaken. During prolonged power outages, waste will be diverted to alternative facilities.	Medium
Loss of telecommunications	Site operations	Prevention of use of primary infrastructure	Low	Low	Low	Telecommunications are important for communication	If telecommunications are lost, then the site has the ability to function manually in this respect. A manual	Low

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Hazard	Receptor	Harm	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	What is the overall risk?
		(site), secondary infrastructure (transport routes, third party facilities)				between SUEZ and third parties	weighbridge pack is provided, which negates the need for the computer system.	
Loss of water	Site operations and infrastructure	Impact on amenity control systems, loss of drinking water	Low	Low	Low	Drinking water is a legal requirement for site staff Surface water pond is used for fire suppression	In the event of a loss of water supply, then bottled drinking water and temporary welfare facilities can be provided to site. A fire hydrant is located in close proximity to the site, providing alternative source of firefighting water.	Low

Internal Risks

Hazard	What may be impacted	Type of impact	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	What is the overall risk?
Fire on site	Site operations and infrastructure, personnel	Physical injury and death, physical damage to site infrastructure, loss of key	Medium	High	High	Fire remains a likely risk at waste management facilities. An uncontrolled fire can easily destroy	See management controls as outlined in the site-specific management system and Fire Prevention Plan (Document reference 1.7)	Medium

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Hazard	What may be impacted	Type of impact	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	What is the overall risk?
		amenity control infrastructure				site infrastructure, rendering the site non-operational.		
Severe accident or personal injury	Site operations, personnel	Severe physical injury or death causing cessation of site operations	Low	High	Medium	Any serious personal injury or death would need to be investigated by the HSE and Police, meaning site operations would cease.	In the event of a serious injury or death, incoming vehicles will immediately be diverted to an alternative facility. The EA will be informed, and contingency arrangements will be made depending on the specifics of the situation. Contingency staff can be mobilised to the site to clear residual waste if needed. SUEZ's Gold Command incident response will be set up to manage an incident.	Low
Security threat	Site operations, site infrastructure (including amenity control infrastructure), transport routes	A physical or cyber security threat can affect site operations (directly through threats or damage, or indirectly via disruption to systems)	Low	Medium	Medium	The site uses computer systems and physical measures to control operations.	If cyber security threats affect SUEZ's computer systems then manual measures can be implemented to receive and dispatch wastes. If a physical threat occurs (ie, terrorist threat or incident) then waste will be diverted to alternative facilities.	Low

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Hazard	What may be impacted	Type of impact	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	What is the overall risk?
Flood	Site operations, site infrastructure (including amenity control infrastructure), transport routes	Floodwater damage to site infrastructure including roller shutter doors, interceptors, roadways	Low	Low	Low	The site is only in Flood Zone 1, meaning the risk of a flood is low. All power units and electrical systems are fitted above likely flood height and interceptors.	Climate change risk assessment in place. If flooding means that site operations cannot continue then incoming vehicles will immediately be diverted to an alternative facility Flood warning services are used by relevant management staff.	Low
Spillage	Site operations, site infrastructure (including drainage infrastructure)	Damage to site surface, drainage system (channels, and interceptor)	Low	Low	Low	Small volumes of hydraulic fluids and oil will be kept in the site building for plant maintenance. Minor spills of anything other than hydraulic fluid and oils are unlikely.	The site operates with spillage procedures detailed in the site-specific management system. Spill kits, spillage procedures and suitably trained site staff. Liquid wastes are not accepted at the facility.	Low
Key plant and equipment failure	Site operations, site infrastructure (including waste handling and amenity control infrastructure)	Failure of fixed and mobile plant	Low	Medium	Medium	The main site operation (receipt, treatment, storage and loading of waste) relies on both fixed and mobile plant. This equipment is in good condition and maintained	Regular maintenance put in place on all fixed and mobile plant. SUEZ's mobile plant contract allows for provision of new plant in the event of failure.	Medium

Hazard	What may be impacted	Type of impact	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	What is the overall risk?
						regularly as required by SUEZ procedures.		
Loss hydraulic fluid/ oils or spare parts	Site operations, site infrastructure (including waste handling and amenity control infrastructure)	Loss of hydraulic fluids and oil, lack of spare parts for mobile/ fixed plant	Low	Medium	Medium	The site requires spare parts for mobile plant/ fixed plant	Spare parts, and hydraulic fluid and oil for mobile plant/ fixed plant are obtained via SUEZ's contract for plant provision and maintenance.	Low
Loss of IT	Site operations	Loss of IT	Low	Low	Low	IT systems are used for weighbridge operations and for supporting site operations. The site operation itself is a manual/physical process, so IT is not critical to ongoing operations.	The weighbridge system can be run manually, with manual operation packs provided in case of a loss of IT. Deliveries and offtakes can be arranged by phone if needed. IT systems are used in plant telematics, but are not critical to plant operation.	Low
Electrical/Grid failure	Site operations, site	Loss of power to lighting systems	Low	Low	Low	Power supply is important for site operations as the		Low

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Hazard	What may be impacted	Type of impact	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	What is the overall risk?
	infrastructure (including waste handling and amenity control infrastructure)					site has fixed plant and power is used for office functionality, weighbridge use and lighting..	In the event of full power loss for a short period, then manual weighbridge operations would commence, and acceptance of waste can be undertaken. During prolonged power outages, waste will be diverted to alternative facilities.	

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4 Contingency Arrangements

4.1.1 Each incident is unique, and as a result the corresponding contingency arrangement will need to be unique to that situation. However, there are several contingency arrangements that SUEZ can plan in advance. These are as follows:

- Alternative sites should the facility be compromised include:
  - Lincoln Storm Ltd, Worle Quarry, Lower Kewstoke Road, Worle, Weston-Super-Mare BS22 9LF (permit reference EPR/KB3002CW)
  - Van Peperzeel, Netherland via Approved Battery Exporter (ABE)
  - Umicore, Belgium via ABE
- Use of replacement staff to provide cover to the site in the event of injury, disease or death affecting the workforce at the facility. Cover staff will be sourced from the wider South and Central region if required.
- Use of manual weighbridge tickets in the event of a full loss of power. Training is provided to the site team so that in the event of a loss of power they can use the emergency ticket pack.

4.2 Recovery of Service

4.2.1 It is important that if an incident occurs, service is recovered to the required level as quickly as possible. This is important for SUEZ, customers and any partners. The timescale for full recovery of service will depend on the severity of the incident. If site operations are completely stopped for over 24 hours, then a bespoke service recovery plan will be developed and communicated to ensure full service is recovered as quickly as possible, and required actions are communicated to all invested parties.

4.2.2 The following stakeholders should be consulted and informed of recovery of service plans:

- SUEZ's commercial team
- SUEZ's health and safety team
- SUEZ's environment and industrial risk team
- Regulators (EA, HSE)
- Customers (both input and offtake)

4.3 Roles and Responsibilities

4.3.1 Basic roles and responsibilities for management of incidents at a regional level are as follows:

Incident Role	Normal Role	Responsibilities
Local Incident Controller	Plant Manager, Operations Manager or Site Manager	• Notify relevant parties (including emergency services if needed) • Identify and set up incident control location (generally the weighbridge office) • Liaise with the emergency services if and when they arrive on site • Manage the incident at a local (site) level
Deputy Local Incident Controller	Shift Manager or Site Supervisor	• Deputise for the Incident Controller at a local (site level) • Support the Incident Controller
Regulator Liaison Controller	EIR Manager H&S Manager	• Communicate and liaise with relevant regulators • EIR Manager to communicate with EA and Fire Service • H&S Manager to communicate with HSE and Fire Service
Regional Incident Controller	Regional Manager (Operations)	• Co-ordinate regional operational response to the incident • Communicate with key stakeholders (including Contract partners and Local Authorities if required) • Communicate with key SUEZ stakeholders (communications team, Regional Director) • Arrange for relief staff if required • Arrange for replacement plant if required • Arrange for repairs or substitute equipment
Regional Incident Controller	Regional Manager (Commercial)	• Co-ordinate regional commercial and material flow response to the incident • Arrange for emergency haulage • Communicate details of the situation and alternative tipping sites to customers

4.3.2 In the event of a serious incident (defined as follows) then the roles and responsibilities as identified in IMS – Emergency Preparedness and Response will also be adopted:

- An accident resulting in life changing injuries to a SUEZ employee or third party.
- A serious fire or explosion resulting in injury or significant business disruption.
- Any event that has led to or created the potential or actual risk of environmental and reputation harm arising out of SUEZ operations and or sites and which may give rise to an investigation by regulatory authorities.
- Any event resulting or likely to result in enforcement activity from a Regulatory Body such as the Health & Safety Executive or Environment Agency/Scottish Environment Protection Agency/Natural Resources Wales.

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Appendix A – Probability and Consequence Assessment Definitions

Hazard: A property or situation that in particular circumstances could lead to harm.

Probability: Probability of exposure is the likelihood of the receptors being exposed to the hazard

Probability	Definition
High (H)	High – exposure is probable: direct exposure likely with no / few barriers between hazard source and receptor.
Medium (M)	Medium – exposure is fairly probable: feasible exposure possible - barriers to exposure less controllable.
Low (L)	Low – exposure is unlikely: several barriers exist between hazards source and receptors to mitigate against exposure.
Very Low (VL)	Very Low – exposure is very unlikely: effective, multiple barriers in place to mitigate against exposure.

Consequence: The adverse effects or impacts of a hazard being realised upon a receptor:

Consequence	Definition
High (H)	Possible irreparable damage to environmental resources
Medium (M)	Possible damage to environmental resources which are limited within a regional context
Low (L)	Possible effects might be transient damage to environmental resources which are commonplace on a regional basis and alternative resources are readily available
Very Low (VL)	The effects are negligible or might cause very slight temporary deterioration in the current environmental resource quality.

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Risk Estimation Matrix

Risk: A combination of the probability, or frequency, of occurrence of a defined accident and the consequence and magnitude of impact. The general High (H), Medium (M), Low (L) and Very Low (VL) ratings listed in the Table below, are for use as a guide only based on:

Table - Risk Estimation Matrix

Matrix for the Estimation of the Risk				
	Consequence			
Probability of the Risk	High	Medium	Low	Very Low
High	High	High	Medium	Low
Medium	High	Medium	Medium	Low
Low	Medium	Medium	Low	Low
Very Low	Low	Low	Low	Low