

From: [SM-Defra-RESP-notifications \(DEFRA\)](#)
To: [Sam Brown](#)
Subject: EPR/FP3132UE/V013 We Need More Information About Your Application CRM:0837104
Date: 14 May 2026 14:42:56
Attachments: [image.png](#)

Dear Sam Brown

Environmental Permitting (England and Wales) Regulations 2016

Application reference: EPR/FP3132UE/V013

Operator: PALM PAPER LIMITED

Facility: Saddlebow Paper Mill EPR/FP3132UE, Poplar Avenue, Kings Lynn, PE34 3AL

Thank you for your application received on 23/02/2026. The following is to confirm our conversation of 11/05/2026.

Unfortunately the application payment you sent is incorrect. The correct application charge is £15,166.22 (1.16.2.1 £13,064.27 + 1.19.2 £808.60 + 1.19.6 £1,293.35). This leaves a balance of £1,182.22 to pay.

We need to ask you for some missing information before we can do any more work on your application. Please provide us with more information to the following questions

We need to know

1. Provide confirmation that the biogas recovered is cleaned up with sulphur levels comparable to natural gas. And confirmation you can achieve current ELVs set for natural gas combustion.

As stated in your application the recovered biogas is going to be used as fuel by injecting it into the current gas supply. You need to confirm that the biogas recovered is cleaned enough to be comparable to natural gas. You also need to demonstrate that the current ELVs can still be achieved.

[Control and monitor emissions for your environmental permit - GOV.UK](#)

[Risk assessments for your environmental permit - GOV.UK](#)

[Air emissions risk assessment for your environmental permit - GOV.UK](#)

2. Provide a full characterisation of the effluent to be treated through the anaerobic digestion (AD). This is required to characterise the waste water going into the AD treatment process and the waste water post AD treatment, prior to treatment through the ETP, as the anaerobic digestion treatment process will change the characteristics of the emission through the AD process and potentially through use of raw materials.

BAT 3(ii)(a)(b)(c) of the Waste Treatment BATC requires the waste water to be treated

to be fully characterised.

BAT 3. In order to facilitate the reduction of emissions to water and air, BAT is to establish and to maintain an inventory of waste water and waste gas streams, as part of the environmental management system (see BAT 1), that incorporates all of the following features:

(ii) information about the characteristics of the waste water streams, such as:

(a) average values and variability of flow, pH, temperature, and conductivity;

(b) average concentration and load values of relevant substances and their variability (e.g. COD/TOC, nitrogen species, phosphorus, metals, priority substances/micropollutants);

(c) data on bioeliminability (e.g. BOD, BOD to COD ratio, Zahn-Wellens test, biological inhibition potential (e.g. inhibition of activated sludge)) (see BAT 52);

[CL2018D1147EN0000040.0001.3bi_cp 1..1](#)

3. Provide a surface water risk assessment showing assessment of the change in emission.

The addition of the anaerobic digestion treatment process will change the characteristics of the emission through the AD process and potentially through use of raw materials. You must provide a H1 assessment in line with SW pollution risk assessment guidance for the addition of biological treatment. You can use actual or estimated data as detailed in the link below.

[Surface water pollution risk assessment for your environmental permit - GOV.UK](#)

4. Provide Form C6

Form C6 needs to be completed and included in your application.

[Application for an environmental permit: part C6 vary a water discharge activity, groundwater activity, or point source emission to water from an installation - GOV.UK](#)

5. Provide tank specifications and containment design required to assess the secondary containment proposed.

The application needs to detail each tank within the process, spill modelling and containment design demonstrating 25%/110% rule has been achieved.

[Control and monitor emissions for your environmental permit - GOV.UK](#)

6. Include an assessment of the potential impacts to the relevant habitat sites from your sites emissions and pay the habitats fee of £808.60 ref 1.19.2 in our charging guidance.

Your application includes habitats sites, these sites need to be assessed as part of a HRA in line with the guidance below. You must include the impacts on these sites as part of your risk assessments where applicable to air and water.

[Habitats regulations assessments: protecting a European site - GOV.UK](#)

[Environmental permits and abstraction licences: tables of charges - GOV.UK](#)

7. Provide an odour management plan (OMP) and pay the relevant fee of £1,293.35 ref. 1.19.6 in our charging guidance.

In line with our guidance below on control and monitor your emissions, you must write an odour management plan that explains how you will prevent or minimise odour if your site causes odour pollution, or if you carry out:

anaerobic digestion

AD sites will nearly always require a comprehensive odour management plan. While a particular feedstock material may not be odorous, the process inherently generates odorous intermediate organic acids from sugars and carbohydrates which are being metabolised.

Guidance on writing on OMP can be found in chapter 6 of [Odour management: comply with your environmental permit - Guidance - GOV.UK](#)

[Control and monitor emissions for your environmental permit - GOV.UK](#)

8. Provide evidence of technical competency

Your application includes AD, which is a regulated biological waste treatment activity, for which you are applying to accept waste. We have not received evidence that the operator has the required technical competence for the AD activity.

Please provide:

The name of the Technically Competent Manager (TCM), and

Evidence that the TCM holds an appropriate qualification under an approved technical competence scheme relevant to AD, or

Evidence that the operator is enrolled on a suitable qualification, including details of any applicable transitional or grace arrangements.

[Legal operator and competence requirements: environmental permits - GOV.UK](#)

Please reply directly to this email with your information and copy in david.wray@environment-agency.gov.uk.

Postal address:
Integrated Permitting Services
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

You must send us the information and or payment by 28/05/2026.

Pay online by credit or debit card

Pay online at this link www.gov.uk/payments/permitting-applications-installations/permitting-application-payment-installations

You need to create your own reference number. Your reference number must follow this format: PSCAPPINSTXXXXYYY. It should include the first five letters of the company name (replacing the X's in the above reference number) and a unique numerical identifier (replacing the Y's in the above reference number). Email us the reference number and the payment date so we can track your payment.

Details of how to pay by other methods are given in Part F1 of the [application form](#).

If we do not receive this by this deadline we will return your application.

If we receive what is missing by the deadline, we will continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by email whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the correct application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,673.78. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>

Note: Our email system has a file size limit of 25MB, if your returns exceed this

limit you will have to arrange an online file transfer. Please ensure the file transfer link does not have a time limit on it.

If you have any questions please phone me on 020 3025 0604 or email david.wray@environment-agency.gov.uk.

Yours sincerely,

David Wray LLB (Hons) (Open)

Installations | Senior Permitting Officer – Manufacturing Team

Environment Agency | Quadrant 2, 99 Parkway Ave, Sheffield, S9 4WF

Mobile: 07442 753953 | **Tel:** 020 3025 0604

Email | david.wray@environment-agency.gov.uk

