

Dear Tim,

Please find attached the redacted version of the reports. I have redacted some further sentences beyond what you have highlighted in yellow upon request from the Applicant.

Operating Techniques:

- Section 6.2.1, 6.2.2, 6.2.4 and 6.2.6 have been redacted as this plainly sets out the process by which the metal recovery takes place and would inform competitors of the overall process allow them to infer from other information what specific processes happen in these laboratories
- Section 10.2 has been fully redacted instead of partially redacted as this left in details of Solvent Extraction and competitors would be able to read the reports to find out what chemicals were used in the is process, especially from the H1 results.
- 10.3.3 there is only one type of solvent used in this processing [REDACTED]. Hence mention of it's properties has been redacted.
- 10.4 Specific mention to the types of machinery has been removed as this provided detail into what types of materials are being produced.
- Table 11.5 Removal of [REDACTED] you have agreed that this can be redacted elsewhere in the report
- Layout Drawings have been removed as the design of the lab gives away what is happening in each location as they are labelled and can help competitors understand the sequence that steps are undertaken. The Stack design has been kept in

H1 Assessment:

The sections that you removed from the H1 assessment still left details of the process and the order of the process in meaning competitors can gain an overall understanding of what is happening in the Laboratories.

We have redacted slightly more than the yellow highlighting to ensure that no one will be able to copy the process like for like.

If you require any further details please do not hesitate to get in touch.

Kind Regards,

Arabella Sharrock | Principal Waste Permitting Consultant
Wardell Armstrong LLP
Sir Henry Doulton House, Forge Lane, Etruria, Stoke on Trent, ST1
5BD
01782 276700





From: Ross, Tim <tim.ross@environment-agency.gov.uk>

Sent: Thursday, June 6, 2024 2:37 PM

To: Sharrock, Arabella <asharrock@wardell-armstrong.com>

Cc: Drakeford-Allen, Dominiqua <ddrakeford-allen@wardell-armstrong.com>; Saghir, Keasar <Keasar.Saghir@environment-agency.gov.uk>

Subject: FW: Application bespoke - Commercial and confidentiality - Altilium Metals - EPR/TP3721SC/A001

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Dear Arabella / Dominiqua

I have been allocated this application. I am currently reviewing the commercial and confidentiality request.

It has been noted that information provided within the Technical note dated April 2024 may be of a commercial confidential nature in relation to the specific chemical processes to be used. For reference I have attached the document with the relevant sections highlighted in yellow that could be redacted by the applicant for the application submission, removing the potential confidential sensitive information from this document. I note that the request is for all of section 6 but the actual chemical process is only identified in Figure 1, within section 7 the treatment chemicals can be redacted, treatment specific information can be redacted within section 10.

For Appendix 1 Hydrometallurgy Laboratory Calculations for Sodium Hydroxide Scrubber there are references to the process in which the chemical are used that can be redacted, the reason given for commercial confidentiality for the Appendix is 'Detailed information', please provide further justification for the redaction of the Appendix section.

Considering the request to remove plans of the site layout those within the application that have been submitted within the Technical note provide the basic internal site layout details and extraction system but do not include any information on the specific treatment process, does the confidentiality request relate to these plans if so please provide further information to identify what is commercially confidential in relation to these.

For the H1 Screening Tool – Emissions to Air Technical Summary Note dated April 2024, the confidentiality request is in regard to section 2 process summary , this section can be reduced to provide a very brief summary by revising the document to remove the highlighted wording as

outlined in the attached copy of the document to address any need to request confidentiality in relation to this document.

If there are further sections within this documents please provide further information to support the specific areas that fall under the commercial confidentiality request, so that if still required for the submitted documents this can be progressed.

Please can you provide a response by Friday 21/06/2024, with updated documents if this addressed the confidentiality element of the application or through provision of further supporting justification for the commercial confidential request. I will address the response on my return to work on the 24/06/24, during my absence if you have any queries regarding the application please contact my colleague Keasar Saghir.

Regards

Tim Ross

Senior Permitting Officer, National Permitting Service

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