

From: [REDACTED]
To: [SM-Defra-RESP-notifications \(DEFRA\)](#)
Cc: [REDACTED]
Subject: RE: EPR/PP3322LR/A001 We Need More Information About Your Application CRM:0269064
Date: 06 August 2026 16:08:41
Attachments: [image005.png](#)
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[RE EPRPP3322LRP001 Enhanced pre-application advice.msg](#)

Hi Katie

The primary reason lithium and cobalt have been excluded from the modelling, despite being acknowledged as potentially present in the emission inventory, is because there are no Environmental Assessment Levels for these compounds that have been approved and published by the Environment Agency. We did discuss this during pre-application consultation, and a record of that discussion is attached.

Whilst we do not believe it is appropriate for a single operator to fund the derivation of an EAL for common compounds that are not unique to its process and which are emitted from a large number of other regulated industries, Watercycle has proposed to complete an updated AQA including the development of relevant EALs as part of a pre-operational condition. This is set out in Section 7.2 of the Supplementary Technical Information Report (STIR).

We further believe any assessment of lithium and cobalt emissions to be premature. As explained in the STIR, the proposed processes are novel and there is no example or precedent from which it is possible to robustly obtain representative emissions data. Nor are there any benchmark emission levels for these compounds. Consequently, the emission concentrations established in the emission inventory are a best guess estimate at a potential level of emission based on a typical composition of black mass. However, black mass composition will vary significantly by supplier and battery type.

Given the above, we would consider it more appropriate to complete such an assessment once the operator has been able to collect actual emission levels during, or a short period of time after, commissioning which encompass a range of different black mass compositions. This updated assessment would also include derivation of EALs for consideration by the Environment Agency and UKHSA. We would propose to work collaboratively with the Environment Agency during this period to ensure environmental and health risks are minimised as much as possible.

The potential presence of lithium and cobalt in certain point source emissions to air has been acknowledged by Watercycle and control measures consistent with BAT for the control of metals have been included in the design. We would also emphasise that, even at

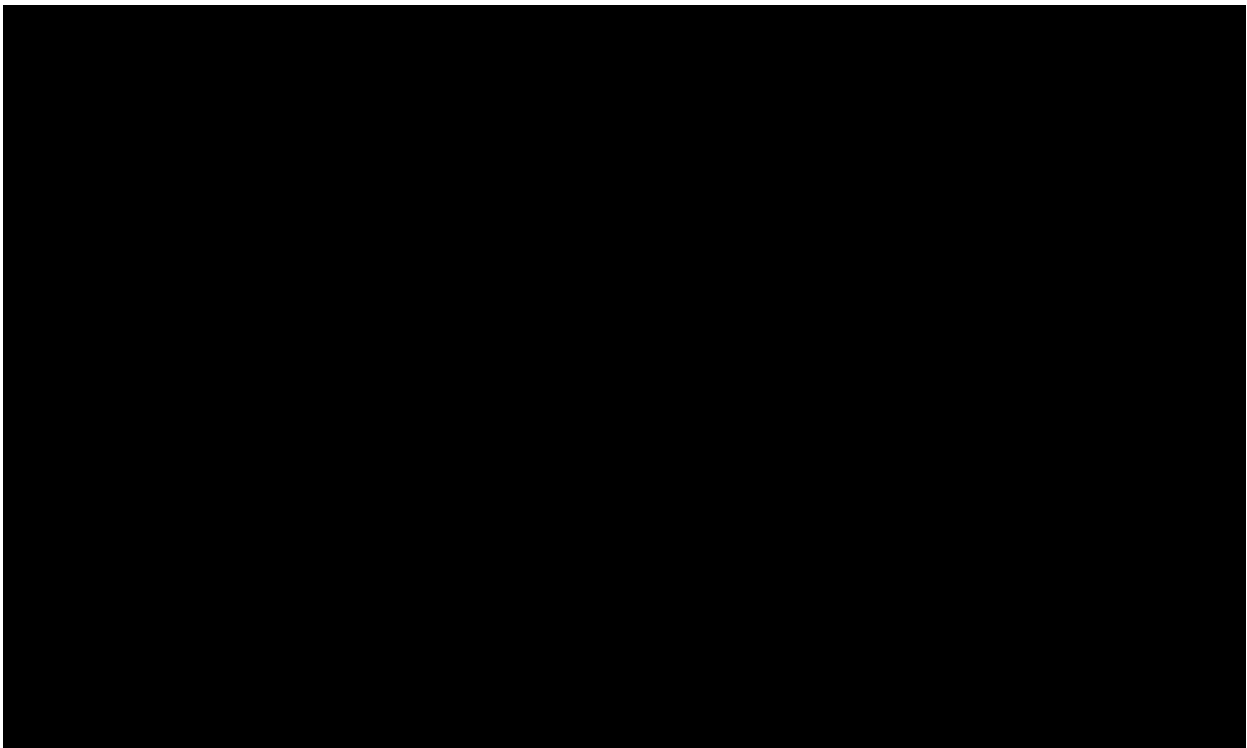
full capacity, this is a small-scale process (black mass waste input of 240 t/y; lithium product output of 60 t/y) and risks would be inherently lower compared to other activities emitting these same compounds. For example, based on the initial conservative estimates, the annual emission of lithium and cobalt is expected to be only 5 kg/y and 0.1 kg/y, respectively. By comparison, a typical 200,000 t/y waste incineration plant would be expected to release 8.5 kg/y of cobalt (nearly 100 times the mass expected to be released from the Watercycle process and where formal assessment of cobalt emissions has never been requested) based on monitored cobalt emissions concentration in the Environment Agency's Guidance on assessing group 3 metal stack emissions from incinerators.

In terms of responding to the request, we will be able to update the dispersion model and AQA report to include modelled process contributions of lithium and cobalt by 13/08/26. However, until an EAL has been established and agreed after going through the lengthy consultation process, and the Operator has been able to obtain actual emission performance levels, any quantified risk assessment is premature. On a qualitative basis, the risk of such impacts is considered low due to control measures in place that are consistent with BAT, and the inherent small scale, batch nature of the process.

Please let me know if this is an acceptable way forward.

I have copied in Susan Anderson with whom the previous discussions on this matter were held during pre-application consultation.

Best regards



From: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>

Sent: 06 August 2026 13:52

To: [REDACTED]

Cc: [REDACTED]

Subject: EPR/PP3322LR/A001 We Need More Information About Your Application CRM:0269064

Dear Adam,

Environmental Permitting (England and Wales) Regulations 2016

Application reference: EPR/PP3322LR/A001

Operator: Watercycle Technologies Limited

Facility: Watercycle Minerals Recovery Plant, The Heath Business Park, Runcorn, WA7 4QX

Thank you for your application received on 18/06/2026.

We need to ask you for some missing information before we can do any more work on your application. The following additional information is required:

- Explain why lithium and cobalt have not been assessed to the same level of detail as other metallic pollutants identified within the application. Lithium and Cobalt are reasonably expected to be present within black mass, and the application acknowledges this however both substances have been omitted from the Air Quality Assessment (AQA) and dispersion modelling.

You must provide a detailed justification for their exclusion, including the screening methodology and criteria applied. Evidence Lithium and cobalt from the installation would not result in significant impacts on human health or ecological receptors. Please note: we would consider Air Quality Assessment and dispersion modelling the most relevant and reliable way to evidence this and as such are likely to require a revision of the AQA. If so the application will be returned to allow for this.

- Air Quality modelling Files. Required to run our own checks

Please reply directly to this email with your information and copy in [REDACTED]

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

You must send us the information by 13/08/2026

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: [The Environment Agency Environmental Permitting and Abstraction Licenceing England Charging Scheme 2022 Amendments up to 15 May 2026](#)

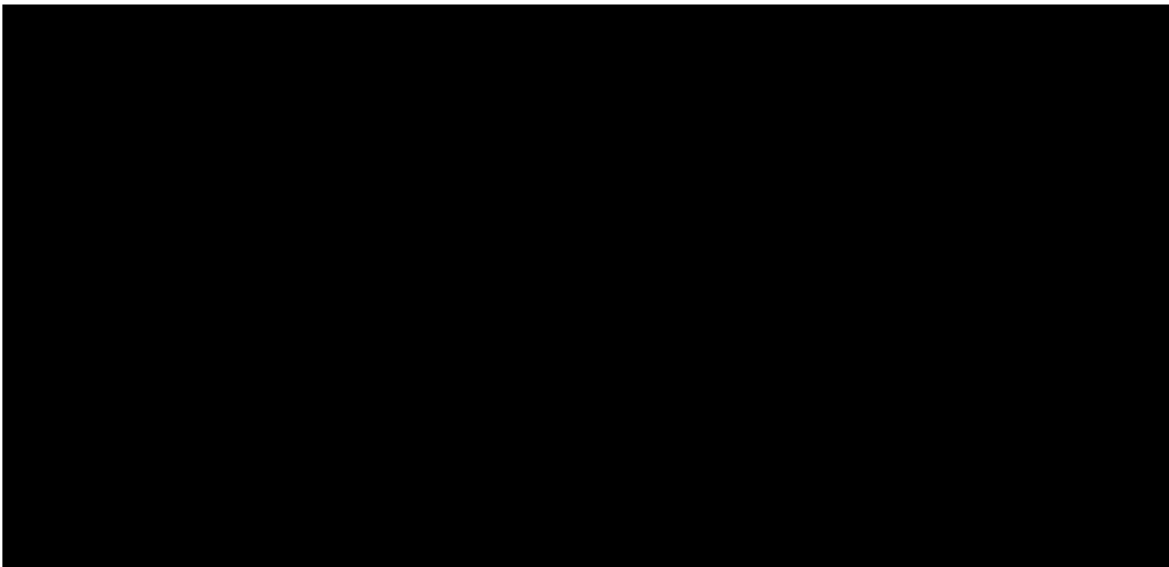
You can send us this determination information by replying directly to this email with your information and copy in [REDACTED]

Without this additional information we will be unable to issue your permit.

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 [REDACTED] or email [REDACTED]

Yours sincerely,



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