

Client: CELLSAFEUK Limited
Address: Units 1, 2 & 3 Round Croft, Field Street, Willenhall, West Midlands, WV13 2PN

**CELLSAFEUK Limited, Round Croft Works,  
Field Street, Willenhall, West Midlands, WV13 2PN**

## **Application for Bespoke Environmental Permit**

### **Non-Technical Summary**




05 February 2026

Our Reference: CELLSAFEUK Ltd-Non-Technical Summary-RP07-Final, Rev B



**Waste And Industry Compliance Ltd**

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CELLSAFEUK Ltd-Non-Technical Summary-RP07-Final, Rev B

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## 1 SITE DETAILS

1.1.1 This Non-Technical Summary (NTS) has been prepared on behalf of CELLSAFEUK Limited (**the Operator**) for Round Croft Works, Field Street, Willenhall, West Midlands, WV13 2PN (**the Site**).

1.1.2 The Operator seeks a bespoke Environmental Permit for the Site to authorise the receipt, storage, shredding, separation and recycling of up to 3,120 tonnes per annum of non-hazardous alkaline batteries (i.e. AA and AAA) only. The receipt and treatment of batteries will not exceed 10 tonnes per day. Lead-acid batteries, lithium and lithium-ion batteries will not be accepted at the Site.

1.1.3 Although the Site will only accept non-hazardous waste, the Environment Agency stated during enhanced pre-application consultations on 19 December 2025:

*“When non-hazardous batteries are treated – and in this case shredded – it changes the nature of the waste and creates hazardous waste. The content of batteries ‘black mass’ is hazardous due to the metals and chemistry of the materials.”*

1.1.4 The Environment Agency also confirmed that the permit application would be Priority Tracked.

1.1.5 The Site incorporates a series of fully enclosed and roofed steel portal framed and metal clad buildings fitted with roller shutter vehicular access doors and pedestrian access door. The floor of all the buildings comprises impermeable concrete slab. There are no drainage outlets inside the buildings, i.e. they are fully sealed and there are no outlets to surface water, groundwater or adjoining land.

1.1.6 All wastes will be stored and processed inside the buildings to ensure that noise and dust etc are suitably controlled.

1.1.7 Appropriate measures will be used to ensure that batteries are suitably processed and treated. The Environmental Permit application has been prepared in accordance with all relevant Environment Agency guidance, including:

- Appropriate measures for Batteries Waste batteries: appropriate measures for permitted facilities - GOV.UK
- Non-hazardous and inert waste: appropriate measures for permitted facilities - GOV.UK
- Chemical waste: appropriate measures for permitted facilities - GOV.UK
- Treating metal waste in shredders: appropriate measures for permitted facilities – Gov.UK

1.1.8 Alkaline batteries will be subject to pre-acceptance and acceptance procedures, including visual inspection, with acceptable and permitted loads off loaded and stored in a series of fireproof concrete bays located inside the Goods Inwards building. Following unloading and storage in the Goods Inward building, batteries will be processed as follows:

- Transferred by forklift truck from the ‘Goods Inward’ building to the Picking Station building, where materials will be unloaded into a reception hopper, which feeds a conveyor and picking station. All batteries will pass along the conveyor. Site operatives will be positioned either side of the conveyor and will visually inspect each battery. Any contraries or inadvertently received non-permitted batteries will be manually removed and stored in a quarantine skip for removal from site to an authorised facility.

- Acceptable batteries will be discharged from the end of the conveyor and stored in palletised containers, which will be transferred by forklift truck to the Processing building.
  - Inside the Processing building, batteries will be fed into a feed hopper and onto a shaker bed, where any dirt or other fine material will be 'shaken off' and captured in a sealed container located below. Clean batteries will then transfer up an inclined conveyor to a shredding plant, where they will be shredded and screened, with 'black mass' material captured in sealed 60 litre containers. Remaining material will transfer via conveyor to a drum magnet for ferrous metal separation into a sealed 0.6m<sup>3</sup> container, before passing to an eddy current separator for capture of brass pins and any other non-ferrous metal. Remaining residual materials such as paper, plastic etc will be stored in a sealed container.
- 1.1.9 Non-hazardous and hazardous wastes will be stored separately and not mixed. The dispatch of hazardous waste, e.g. black mass, will be in accordance with a Hazardous Waste Consignment Note, whereas non-hazardous wastes will be transferred in accordance with a Season Ticket or Waste Transfer Note.
- 1.1.10 A high level of site security will be maintained. The buildings and perimeter gate are fully locked and secured outside of operational hours and a comprehensive CCTV system has been installed, so that the Site is monitored on a 24 hour, 7 days a week basis, 52 weeks of the year.
- 1.1.11 An Environmental Management System (EMS) has been prepared for the Site, which sets out how the Operator will manage the facility to ensure a high standard of environmental protection and best practice, see CELLSAFEUK Ltd-EMS-RP02-Final. A detailed Dust Emissions Management Plan has also been prepared for the Site to ensure a high standard of environmental protection.
- 1.1.12 The Site has been designed to meet the requirements of Environment Agency Fire Prevention and Mitigation Plan Guidance – Waste Management. A detailed Fire Prevention Plan (FPP) has been prepared for the Site, see CELLSAFEUK Ltd-FPP-RP03-Final. The purpose of the FPP is to minimise any potential risk of fire at the Site.
- 1.1.13 The Site will be managed by WAMITAB (Waste Management Industry Training and Advisory Board) accredited staff to ensure compliance with all regulatory requirements and the conditions of the Environmental Permit. It will also be subject to independent inspections by officers of the Environment Agency.
- 1.1.14 It is important to note that a separate company, namely Fenix Battery Recycling Limited, previously occupied the Site and submitted an Environmental Permit application to the Environment Agency on 18 February 2021. However, the Environment Agency refused the application on 04 April 2022 (application reference EPR/WP3201LD). Fenix Battery Recycling Limited subsequently vacated the Site but left circa 500 tonnes of alkaline batteries in situ.
- 1.1.15 Fenix Battery Recycling Limited entered Liquidation on 2 September 2024 and there is no possibility that they will remove and safely dispose of the batteries they deposited. The Environment Agency Crime Team (Peter.Southgate@environment-agency.gov.uk) are aware of the previous deposit.
- 1.1.16 Issue of an Environmental Permit to CELLSAFEUK Limited would enable the company to safely process the in-situ batteries and recycle shredded and separated components such as black mass, brass, other non-ferrous metals and any ferrous metal components. Once the in-situ batteries have been processed and cleared, the company would import up to 10 tonnes per day of alkaline batteries for recycling.