



From: [REDACTED]@clearway-group.co.uk>
Sent: 30 January 2026 17:16
To: [REDACTED]@daera-ni.gov.uk>; [REDACTED]@daera-ni.gov.uk>
Cc: [REDACTED]@clearway-group.co.uk>; [REDACTED]@daera-ni.gov.uk>
Subject: Re: FP Jan 2026 _ Clearway Belfast _ WML 31/20

Dear [REDACTED]

I trust this finds you both well. Thank you for your comments regarding Section 1(b), the Site Data / stockpiles information and the Financial Provision (FP).

We have now amended the documentation to address the points raised and to ensure alignment between the Working Plan and the FP.

Section 1(b) has been retained as the primary EWC control table.

A derived material summary has been added to group EWC codes into ferrous, non-ferrous, ELVs and residual wastes for ease of reference.

A new "Maximum Permitted Storage Capacities" table has been added to define the maximum quantities.

The FP has been revised so that quantities match the Maximum Permitted Storage Capacities table.

Any reference to the Fire Action Plan's burn times etc "App 3" should have been removed prior to the response being sent. That was a miscommunication on my part. I apologise for the unnecessary uncertainty caused.

I have attached a recent copy of an invoice from [REDACTED]. The tyre disposal rate is an agreement of [REDACTED]. Our per unit cost within the FP allows for this.

We trust this addresses the inconsistencies previously identified. Please let us know if any further clarification is required. Have a great weekend.

Aye,

[REDACTED]

From: [REDACTED]@daera-ni.gov.uk>
Sent: Wednesday, January 21, 2026 12:00
To: [REDACTED]@clearway-group.co.uk>; [REDACTED]@daera-ni.gov.uk>
Cc: [REDACTED]@clearway-group.co.uk>; [REDACTED]@daera-ni.gov.uk>
Subject: RE: FP Jan 2026 _ Clearway Belfast _ WML 31/20

Hi [REDACTED]

[REDACTED] is off today so I am responding to your e-mail and to the one you sent me on Monday with the updated Working Plan.

I am content that the changes I requested in Point 1 and 2 of the attached e-mail have been addressed i.e. Waste description have been attached to the EWC Codes in Section 1(b) and the Fire contacts have been updated. The maximum storage capacities detailed on Section 1(b) are however still different from those detailed in the Site Data / stockpiles section and both are different from those detailed on the attached Financial Provision (FP) calculation.

I think the easiest way to rectify this would be to add an additional summary table to the end of Section 1 (b) which combines the individual waste codes into the broader waste type headings such as Depolluted ELVs, Undepolluted ELVs, Ferrous Metal, Non-Ferrous Metal, Ferrous filings and turnings, non-ferrous filings and turnings, glass, plastic, shredder waste, batteries, WEEE etc . The table should be titled "Maximum Permitted Storage Capacities" and the combined quantities must accurately reflect the maximum proposed quantity for each waste type to be stored on the site, the quantities detailed on the FP calculation must then match this.

Appreciate if you could also clarify what Appendix 3 relates to as we were unsure and thought it may be part of the Fire Action Plan as it contains burn times and risk ratings. Appreciate if you could also clarify why these quantities differ from Section 1(b).

Can you also confirm the figure of [REDACTED] per tyre as typically the cost for disposal of tyres is around [REDACTED] please? I am content with all other unit costs.

This information should be provided on or before 30 January 2025. Should you require any clarification regarding this e-mail, please do not hesitate to contact me.

Many thanks

[REDACTED]

Waste Management Licensing



Northern Ireland Environment Agency
Gníomhaireacht Comhshaoil Thuaisceart Éireann
Northern Ireland Environment Agency
www.daera-ni.gov.uk



An Agency within the Department of
Agriculture, Environment
and Rural Affairs
www.daera-ni.gov.uk

Gníomhaireacht de chuid na Roinne
Talmhaíochta, Comhshaoil
agus Gnóthaí Tuaithe

An Aghaid
Fairr
an t

From: [REDACTED] <[\[REDACTED\]@clearway-group.co.uk](mailto:[REDACTED]@clearway-group.co.uk)>

Sent: 21 January 2026 10:48

To: [REDACTED] <[\[REDACTED\]@daera-ni.gov.uk](mailto:[REDACTED]@daera-ni.gov.uk)>

Cc: [REDACTED] <[\[REDACTED\]@daera-ni.gov.uk](mailto:[REDACTED]@daera-ni.gov.uk)>; [REDACTED] <[\[REDACTED\]@clearway-group.co.uk](mailto:[REDACTED]@clearway-group.co.uk)>

Subject: FP Jan 2026 _ Clearway Belfast _ WML 31/20

Dear [REDACTED]

We trust this finds you well.

As part of our annual evaluations, we are currently reviewing the Financial Provision (FP) for our East Twin Road site. We are writing to propose an adjustment to our bond and would greatly value your advice and feedback on our intended approach.

To more accurately reflect our evolving operational profile, specifically the growth in the volume of End-of-Life Vehicles (ELVs) and associated materials, we are seeking to increase our provision.

While our routine site management and physical capacity are typically capped at 42,500 T (as detailed in the attached Appendix 3: Site Data), our site's working plan (Section 1b, p.4) allows for a theoretical maximum of approximately 45,000 T to provide flexibility across EWC codes. We propose that the FP calculation be based on this upper threshold of 45,000 T.

We are eager to ensure this alignment meets your expectations and would welcome your guidance on whether this proposal is acceptable to the Department. We remain available to discuss any adjustments you may deem necessary.

Thank you for your time and assistance in this matter.

Yours sincerely,



Tel: 02890 457556 Ext 227 | 07802764245 | [REDACTED] [@clearway-group.co.uk](mailto:[REDACTED]@clearway-group.co.uk)

Table 01 WP – Revised

LoW Code	Description	Max Stock (t)
02 01 10	Waste metal (Agri/Horti/Forestry)	25
10 03 16	Aluminium skimming	10
11 05 01	Hard zinc	25
11 05 02	Zinc ash	10
12 01 01	Ferrous metal filings and turnings	700
12 01 02	Ferrous metal dust and particles	10
12 01 03	Non-ferrous metal filings and turnings	25
12 01 13	Welding wastes	2
12 01 99	Metal machining wastes (NOS)	2,000
15 01 04	Metallic packaging	20
16 01 03	End-of-life tyres	5
16 01 04*	End-of-life vehicles (Polluted)	150
16 01 06	End-of-life vehicles (Depolluted)	3,000
16 01 12	Brake pads	2
16 01 16	Tanks for liquefied gas	2
16 01 17	Ferrous metal (from ELV)	100
16 01 18	Non-ferrous metal (from ELV)	200
16 01 19	Plastic	5
16 01 20	Glass	5
16 01 21*	Hazardous components (other)	20
16 01 22	Components not otherwise specified	5
16 01 99	ELV components (NOS)	5
16 02 14	Discarded equipment (non-hazardous)	10
16 02 16	Components from discarded equipment	5
16 06 01*	Lead batteries	50
16 08 01	Spent catalysts (precious metals)	2
17 04 01	Copper, bronze, brass	50
17 04 02	Aluminium	3
17 04 03	Lead	30
17 04 04	Zinc	5
17 04 05	Iron and steel (Construction)	3,000
17 04 06	Tin	2
17 04 07	Mixed metals	1
17 04 11	Cables	5
19 01 02	Ferrous materials from bottom ash	3
19 10 01	Iron and steel waste (Shredder)	3,750
19 10 02	Non-ferrous waste (Shredder)	150
19 10 04	Fluff-light fraction and dust	500
19 10 05*	Other fractions (hazardous)	25
19 10 06	Heavy Shredder Residue	9,000
19 12 02	Ferrous metal (Mechanical treatment)	3,500
19 12 03	Non-ferrous metal (Mechanical treatment)	75
19 12 12	Other wastes (Mechanical treatment)	8,000

20 01 34	Batteries (non-hazardous)	2
20 01 36	WEEE (non-hazardous)	25
20 01 40	Metals (Municipal waste)	50

Ferrous	21,226
Non-Ferrous	9,678
ELV	3,150
Waste	516
Total	34,570



Table 02 WP – Maximum Permitted Storage Capacities - Revised

Waste Type	Max Permitted Storage (t)
End-of-Life Vehicles (ELVs)	150
Depolluted ELVs	3,000
Ferrous Metals	10,413
Ferrous Metal Filings/Turnings	700
Non-Ferrous Metals	611
Non-Ferrous Metal Filings/Turnings	25
Shredder Residue / Fluff / Light	500
Heavy Shredder Residue (Other)	9,000
Plastics	5
Glass	5
End-of-Life Tyres	5
Batteries (lead and non-lead)	52
Waste Electrical & Electronic (WEEE)	35
Hazardous ELV Components	20
Bulk Machining/Treatment Waste	10,000
Minor Components/Misc	50
Fuel Oil - Petrol	1.5
Fuel Oil - Diesel	1.5
Fuel Oil - Dirty	1.5
Coolant	2.2
Brake Fluid	1.1
Antifreeze	2.2
Engine/ Transmission / Hydraulic Oils	4
Oil and Air Filters	1
Oily Rags	0.25
Spent Oil absorbents	1
Aerosols	0.25
Total	34,588

FP Table for review

Financial Provision for Clearway Disposals Ltd P0483/15A & LN/21/14/V2				
Waste stream	Qty	Unit	Disposal Cost / unit	Total disposal cost
Undepolluted ELVs	150	Vehicles		
Depolluted ELVs	3000	Vehicles		
Ferrous Metal	21,113	tonnes		
Non-Ferrous Metal	9,636	tonnes		
Residual Wastes produced as a result of the depollution of ELVs				
Fuel Oil - Petrol	2000	litres		
Fuel Oil - Diesel	2000	litres		
Fuel Oil - Dirty	2000	litres		
Coolant	2200	litres		
Brake Fluid	1000	litres		
Antifreeze	2200	litres		
Engine/ Transmission / Hydraulic Oils	5000	litres		
Oil and Air Filters	1	tonnes		
Oily Rags	0.25	tonnes		
Spent Oil absorbents	1	tonnes		
Aerosols	0.25	tonnes		
Batteries	52	tonnes		
Tyres	500	units		
Glass	5	tonnes		
Plastic	5	tonnes		
Metal	70	tonnes		
Other residual	535	tonnes		
Total disposal costs				
Site Remediation Costs				
Cleaning site surfaces		m ²		
Cleaning site drains		m ² / litre		
Emptying / cleaning interceptors		tonnes/ litres		
Other remediation		m ² / tonnes		
Total remediation costs				
Total Financial Provision Required for this site				

[REDACTED]

From: [REDACTED]@clearway-group.co.uk>
Sent: 26 February 2026 11:02
To: [REDACTED]
Subject: Clearway Belfast WP / FP

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Hi [REDACTED]

I trust you are well. I am making my way back to the office now, but I wanted to share the calculations I have used to populate the information for the WP and FP. I hope to call you in the next 20 mins or so. Thank you for your patience.

Aye,

[REDACTED]

Sent from [Outlook for iOS](#)

[REDACTED]

From: [REDACTED]
Sent: 26 February 2026 15:41
To: [REDACTED]
Cc: [REDACTED]
Subject: Agreed FP amount and FP mechanism template 2026
Attachments: Financial Provision - Mechanism Template - Bank Bond - Updated 27.03.2025.DOCX

Good afternoon [REDACTED]

Thank you for submitting the 2026 FP calculation for your sites **WML 31/20** and **P0483/15A** at East Twin Road, Belfast Harbour Estate, Belfast, BT3 9EN. This figure has now been agreed. As the FP calculations for each of your sites has now been agreed, you are required to provide a suitable mechanism to cover this amount.

Agreed FP calculations for your sites are as follows:

WML 13/72: £ [REDACTED]
WML 13/65/T: £ [REDACTED]
WML 30/11: £ [REDACTED]
WML 31/20 & P0483/15A: £ [REDACTED]

The **total** amount required to be covered by your FP mechanism is £ [REDACTED]. Please find attached the updated Bank Bond template for reference. Your current bank bond expires on 5th March 2026.

Many thanks,

[REDACTED]
Waste Management Licensing Team

Regulation Unit | NIEA

17 Antrim Road | Tonagh | Lisburn | Co. Antrim | BT28 3AL

☎ (028) 9262 3110 (ext 30110)

✉ [REDACTED]@daera-ni.gov.uk | www.daera-ni.gov.uk



Northern Ireland Environment Agency
Gníomhaireacht Comhshaoil Thuaisceart Éireann
Norlin Airlan Environment Agency



AS PART OF THE NIEA VERIFICATION PROCESS ALL BANK BONDS MUST NOW BE ON BANK HEADED PAPER AND WORDING AS BELOW SHOULD NOT BE AMENDED [DELETE THIS INSTRUCTION BEFORE SUBMISSION TO NIEA]

Northern Ireland Environment Agency,
Regulation Unit,
17 Antrim Road,
Tonagh,
Lisburn,
County Antrim,
BT28 3AL

Date:

Our Reference:

BOND

Dear Sirs,

We understand that you have agreed a contract relating to the following waste authorisation:

Waste Authorisation Number for *Name of authorised site* located at *Address of authorised site* with *Name of authorisation holder*, *Address of authorised site* (the “Operator”), (the “Contract”).

1. In consideration of the Northern Ireland Environment Agency (“**you, your**”) entering into the Contract and at the request of the Operator, [*issuing bank*] (“**we, us**”), hereby irrevocably and unconditionally undertake to pay you on first demand, irrespective of the validity and the effects of the Contract and waiving all rights of objection and defence, any amount up to the aggregate sum of GBP.....(in words:), provided always that our maximum liability in respect of any and all demands shall not exceed in aggregate this sum and upon receipt of the following documents:-
 - a. your first written and duly signed request for payment;
 - b. your written confirmation that the Operator has failed to fulfil their obligations as specified in the Contract; and
 - c. confirmation of the amount claimed.
2. We accept such demand as conclusive evidence, for the purposes of this bond alone, that the amount claimed is due to the Northern Ireland Environment Agency under this bond.
3. For the purpose of identification, your request for payment and your confirmation thereunder must be presented to us through your bankers who must confirm that the signatures thereon are binding for Northern Ireland Environment Agency and quoting our Reference.
4. Our liability hereunder shall expire on (the “**Expiry Date**”) except in respect of any written demands for payment, complying with all the requirements hereof, received by us before close of business at this office on or before the Expiry Date, after which date this bond shall automatically become null and void whether returned to us or not.

5. This bond is subject to the laws of Northern Ireland and the parties irrevocably submit to the exclusive jurisdiction of the Courts of Northern Ireland.
6. This bond may be executed in any number of counterparts and by the different parties hereto on separate counterparts each of which when so executed and delivered shall be an original but all the counterparts shall together constitute but one and the same instrument
7. This bond and the undertaking contained therein is personal to you and is not transferable or assignable.
8. All correspondence should be addressed to [*issuing bank name and address*], quoting our Reference.

Yours faithfully,

Signature _____

Print Name _____

Date _____

FOR AND ON BEHALF OF (BONDSMAN)

Signature _____

Print Name _____

Date _____

FOR AND ON BEHALF OF (BONDSMAN)

Signature _____

Print Name _____

Date _____

FOR AND ON BEHALF OF NIEA



[REDACTED]

From: [REDACTED]@clearway-group.co.uk>
Sent: 26 February 2026 11:02
To: [REDACTED]
Subject: CM: Clearway Belfast WP / FP
Attachments: WP FP Calcs.xlsx

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Hi [REDACTED]

I trust you are well. I am making my way back to the office now, but I wanted to share the calculations I have used to populate the information for the WP and FP. I hope to call you in the next 20 mins or so. Thank you for your patience.

Aye,

[REDACTED]

Sent from [Outlook for iOS](#)

LoW Code	Description	Max Stock (t)
02 01 10	Waste metal (Agri/Horti/Forestry)	25
10 03 16	Aluminium skimmings (non-hazardous)	10
11 05 01	Hard zinc	25
11 05 02	Zinc ash	10
12 01 01	Ferrous metal filings and turnings	700
12 01 02	Ferrous metal dust and particles	10
12 01 03	Non-ferrous metal filings and turnings	25
12 01 13	Welding wastes	2
12 01 99	Metal machining wastes (n.o.s.)	2,000
15 01 04	Metallic packaging	20
16 01 03	End-of-life tyres	5
16 01 04*	End-of-life vehicles (Hazardous)	150
16 01 06	End-of-life vehicles (Depolluted)	3,000
16 01 12	Brake pads	2
16 01 16	Tanks for liquefied gas	2
16 01 17	Ferrous metal (from ELV)	100
16 01 18	Non-ferrous metal (from ELV)	200
16 01 19	Plastic	5
16 01 20	Glass	5
16 01 21*	Hazardous components (other)	20
16 01 22	Components not otherwise specified	5
16 01 99	ELV components (n.o.s.)	5
16 02 14	Discarded equipment (non-hazardous)	10
16 02 16	Components from discarded equipment	5
16 06 01*	Lead batteries	50
16 08 01	Spent catalysts (precious metals)	2
17 04 01	Copper, bronze, brass	50
17 04 02	Aluminium	3
17 04 03	Lead	30
17 04 04	Zinc	5
17 04 05	Iron and steel (Construction)	3,000
17 04 06	Tin	2
17 04 07	Mixed metals	1
17 04 11	Cables	5
19 01 02	Ferrous materials from bottom ash	3
19 10 01	Iron and steel waste (Shredder)	3,750
19 10 02	Non-ferrous waste (Shredder)	150
19 10 04	Fluff-light fraction and dust	500
19 10 05*	Other fractions (hazardous)	25
19 10 06	Heavy Shredder Residue	9,000
19 12 02	Ferrous metal (Mechanical treatment)	3,500
19 12 03	Non-ferrous metal (Mechanical treatment)	75
19 12 12	Other wastes (Mechanical treatment)	8,000
20 01 34	Batteries (non-hazardous)	2
20 01 36	WEEE (non-hazardous)	25
20 01 40	Metals (Municipal waste)	50

34569

Waste Type	Max Permitted Storage (t)
End-of-Life Vehicles (ELVs)	150
Depolluted ELVs	3,000
Ferrous Metals (all sources)	10,413
Ferrous Metal Filings/Turnings	700
Non-Ferrous Metals (all sources)	611
Non-Ferrous Metal Filings/Turnings	25
Shredder Residue / Fluff / Light	500
Heavy Shredder Residue (Other)	9,000
Plastics	5
Glass	5
End-of-Life Tyres	5
Batteries (lead and non-lead)	52
Waste Electrical & Electronic (WEEE)	35
Hazardous ELV Components	20
Bulk Machining/Treatment Waste	10,000
Minor Components/Misc	50
Fuel Oil - Petrol	1.5
Fuel Oil - Diesel	1.5
Fuel Oil - Dirty	1.5
Coolant	2.2
Brake Fluid	1.1
Antifreeze	2.2
Engine/ Transmission / Hydraulic Oils	4
Oil and Air Filters	1
Oily Rags	0.25
Spent Oil absorbants	1
Aerosols	0.25
Total	34,588

Waste Type - FP	Storage (t)
End-of-Life Vehicles (ELVs)	150
Depolluted ELVs	3,000
Ferrous Metals (all sources)	21,113
Non-Ferrous Metals (all sources)	9636
Plastics	5
Glass	5
End-of-Life Tyres	5 500@10kgs/unit
Batteries (lead and non-lead)	52
Hazardous ELV Components	20
Minor Components/Misc	50
Fuel Oil - Petrol	1.5 2kL@0.75kg/L
Fuel Oil - Diesel	1.5 2kL@0.8kg/L
Fuel Oil - Dirty	1.5 2kL@0.75kg/L
Coolant	2.2 2.2kL@1kg/L
Brake Fluid	1.1 1kL@1.1kg/L

Antifreeze	2.2	2.2kL@1kg/L
Engine/ Transmission / Hydraulic Oils	4	5kL@0.8kg/L
Oil and Air Filters	1	
Oily Rags	0.25	
Spent Oil absorbants	1	
Aerosols	0.25	
Other residuals	535	
TOTAL	34,588	

From: [REDACTED]@clearway-group.co.uk>
Sent: 26 February 2026 12:05
To: [REDACTED]
Cc: [REDACTED]
Subject: Submission of Work Plan and Financial Plan - Clearway Belfast
Attachments: Working Plan - Clearway_Belfast - 2026_Rev D.doc; Belfast MASTER FP Calculation template for non-landfill activities_Jan 2026.xlsx

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Dear All,

Please find attached the Work Plan (WP) Rev D and Financial Plan (FP) for Clearway Belfast for your review.

Should you require any information, or if any amendments are necessary, please do not hesitate to contact me. I thank you for your continued patience.

We look forward to hearing from you.

Aye,

Clearway
Metal Recycling

Hammond Lane
Metal Company
Part of the Clearway Group

Tel: 02890 457556 Ext 227 | 07802764245 | [REDACTED]@clearway-group.co.uk

Clearway Disposals Ltd

East Twin Rd, Belfast Harbour, BT1 2BB

Working Plan

Processing Ferrous and Non-Ferrous metals by Shredding, Shearing, Baling and Segregation and Separation. Transport of waste and collection End of Life Vehicles of and an Authorised Treatment Facility for their depollution

Revision D

February 2026

Draft Example Working Plan

Contents Page

1. Site Operations

- a. Waste Types
- b. Waste Quantities
- c. Waste Acceptance and Control Procedures
- d. Waste Management Processes
- e. Waste Handling and Treatment Operations, and their Control
- f. Plant and Equipment
- g. Waste Storage
- h. Waste Quantity Measurement Systems
- i. Hours of Operation
- j. Staffing and Supervision

2. Site Engineering, containment and drainage systems

3. Site Infrastructure

- a. Provision of site identification board
- b. Site Security

4. Amenity Management and Reporting

- a. Monitoring and Control of Mud and Debris
- b. Monitoring and Control of Leaks and Spillages
- c. Monitoring and Control of Dust, Fibres and Particulates
- d. Monitoring and Control of Odours
- e. Monitoring and Control of Noise
- f. Monitoring and Control of Pest Infestations
- g. Monitoring and Control of Litter
- h. Fire Action Plan
- i. Safety and Emergency Procedures

5. Site Records

- a. Provision of a Site Diary
- b. Security and availability of records
- c. Records of waste movements

Appendices

Appendix 1: Site Drawings and Plans

- Drawings A & B. Illustrate the location of all activities on site.
- Drawing C Site Drainage Plan. Shows the four site drainage layouts, including the locations of interceptors and discharge points.

Appendix 2: Fire and Site Data

- Fire Action Plan. Contains the formal emergency procedure and defined responsibilities.
- Site Data. Provides details of the stockpiles and equipment available for moving materials and equipment in case of a fire.
- Note: This appendix is also referred to as the “Drainage Plan” (A02, Rev-J) in the Site Engineering section, detailing the drainage system.

Appendix 3: Technical Competence

- WAMITAB Certificate – Technical competency.

Appendix 4: IMS Procedures

- ISP4.04 Transport Operations.
- ISP4.11 Waste Disposal
- ISP4.16 Depollution of ELVs

1. Site Operations

a. Waste Types

b. Waste Quantities

LoW Code	Description	Max Stock (t)
02 01 10	Waste metal (Agri/Horti/Forestry)	25
10 03 16	Aluminium skimming	10
11 05 01	Hard zinc	25
11 05 02	Zinc ash	10
12 01 01	Ferrous metal filings and turnings	700
12 01 02	Ferrous metal dust and particles	10
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12 01 13	Welding wastes	2
12 01 99	Metal machining wastes (NOS)	2,000
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16 01 03	End-of-life tyres	5
16 01 04*	End-of-life vehicles (Polluted)	150
16 01 06	End-of-life vehicles (Depolluted)	3,000
16 01 12	Brake pads	2
16 01 16	Tanks for liquefied gas	2
16 01 17	Ferrous metal (from ELV)	100
16 01 18	Non-ferrous metal (from ELV)	200
16 01 19	Plastic	5
16 01 20	Glass	5
16 01 21*	Hazardous components (other)	20
16 01 22	Components not otherwise specified	5
16 01 99	ELV components (NOS)	5
16 02 14	Discarded equipment (non-hazardous)	10
16 02 16	Components from discarded equipment	5
16 06 01*	Lead batteries	50
16 08 01	Spent catalysts (precious metals)	2
17 04 01	Copper, bronze, brass	50
17 04 02	Aluminium	3
17 04 03	Lead	30
17 04 04	Zinc	5
17 04 05	Iron and steel (Construction)	3,000
17 04 06	Tin	2
17 04 07	Mixed metals	1
17 04 11	Cables	5
19 01 02	Ferrous materials from bottom ash	3

19 10 01	Iron and steel waste (Shredder)	3,750
19 10 02	Non-ferrous waste (Shredder)	150
19 10 04	Fluff-light fraction and dust	500
19 10 05*	Other fractions (hazardous)	25
19 10 06	Heavy Shredder Residue	9,000
19 12 02	Ferrous metal (Mechanical treatment)	3,500
19 12 03	Non-ferrous metal (Mechanical treatment)	75
19 12 12	Other wastes (Mechanical treatment)	8,000
20 01 34	Batteries (non-hazardous)	2
20 01 36	WEEE (non-hazardous)	25
20 01 40	Metals (Municipal waste)	50

Ferrous	21,226
Non-Ferrous	9,678
ELV	3,150
Waste	516
Total	34,570

All codes and descriptions used in these tables are sourced from the List of Waste (LoW) as defined and assessed within the Technical Guidance WM3: Waste Classification (1st Edition v1.2.NI).

Maximum Permitted Storage Capacities

The table below summarises the maximum quantities of each waste type that may be stored on site at any one time.

The quantities are derived from, and do not exceed, the individual EWC waste stream limits detailed in Section 1(b).

These quantities represent the highest possible concurrent stock levels for each waste type.

Waste Type	Max Permitted Storage (t)
End-of-Life Vehicles (ELVs)	150
Depolluted ELVs	3,000
Ferrous Metals	10,413
Ferrous Metal Filings/Turnings	700
Non-Ferrous Metals	611
Non-Ferrous Metal Filings/Turnings	25
Shredder Residue / Fluff / Light	500
Heavy Shredder Residue (Other)	9,000
Plastics	5
Glass	5
End-of-Life Tyres	5
Batteries (lead and non-lead)	52
Waste Electrical & Electronic (WEEE)	35
Hazardous ELV Components	20
Bulk Machining/Treatment Waste	10,000
Minor Components/Misc	50
Fuel Oil - Petrol	1.5
Fuel Oil - Diesel	1.5
Fuel Oil - Dirty	1.5
Coolant	2.2
Brake Fluid	1.1
Antifreeze	2.2
Engine/ Transmission / Hydraulic Oils	4
Oil and Air Filters	1
Oily Rags	0.25
Spent Oil absorbents	1
Aerosols	0.25
Total	34,588

Table 02 Maximum Permitted Storage Capacities

The quantities above are controlling maximum and are not additive. They represent the maximum quantity of each waste type that may be stored on site at any one time and are intended to provide a clear linkage between the detailed EWC waste streams in Section 1(b), the site stockpile information.

c. Waste Acceptance and Control Procedures

Waste Reception

Any person delivering waste to the site, other than the licence holder or his employees, shall report to site staff before depositing the waste. They shall be directed to the appropriate waste storage area by the site staff.

Waste Records

A record shall be kept of all vehicles or ships depositing or removing waste. Records will be kept of the quantities of waste being brought on and taken off-site. Duty of Care Waste Transfer Notes, Consignment Notes and Annex VII are signed and stored in the weighbridge office. These records will be made available during site opening hours to any Authorised Officer of the NIEA on request.

Quarterly Returns are submitted to NIEA with a summary of the waste which has been deposited or removed from the site in the previous quarter. An annual report is also submitted to NIEA.

Rejection of Wastes

All loads of scrap metal are inspected. If inappropriate material is found, the load will be rejected, and the vehicle will be turned away. If the rejected load is believed to contain Hazardous Waste, the NIEA will be informed of the decision and the reason for the return of the load.

Radiation Detection

Radiation detectors are located at the input weighbridge to prevent radioactive material from being received into the site. A hand-held radiation detector is used to check any material that is suspected of emitting radiation. The hand-held radiation detector is also used to check export container loads of non-ferrous and the empty ship's hold before loading ferrous materials.

The discovery of radioactive material will be reported to the NIEA Industrial Pollution & Radiochemical Inspectorate (IPRI), NIEA Lisburn, 17 Antrim Road Tonagh, Lisburn, Co. Antrim, BT28 3AL; Tel. 028 9056 9299; email: ipri@daera-ni.gov.uk

- d. Waste Management Processes
- e. Waste Handling and Treatment Operations, and their Control

Shredding and separation of scrap metals including treated ELVs

The shredder process is an industrial system used to break down end-of-life vehicles and other metal scrap into small, manageable pieces to enable separation/recycling.

Infeed and Metering

Prepared vehicle hulks, bales or scrap are placed onto the infeed conveyor using a materials handler fitted with a grapple. The shredder operator feeds the material into the shredder at a controlled rate to maintain steady processing and prevent jams.

Primary Shredding (Hammermill Operation)

The heart of a shredder is a large hammermill, which consists of a high-speed rotating rotor with high-mass hammers that smash the scrap into progressively smaller pieces, tearing apart steel, aluminium, and non-metallic materials.

Water injection systems are used to minimise dust, noise, emissions, and fire risk.

Discharge and Initial Separation

The shredded material exits the mill onto a vibrating feeder. The mixed fragments first pass into an air classifier with cyclones to separate light materials (fluff) from the heavier metals, non-ferrous metals and non-metals. The light materials (fluff) are sent to a licensed landfill for disposal.

Ferrous Metal Recovery

A series of magnetic separators removes ferrous metals.

There are two hand-picking lines to remove alternator and large pieces for rubber with magnetic metals attached.

Non-Ferrous Metal Recovery

After ferrous removal, the remaining mix contains a mixture of non-ferrous metals and heavy non-metals, which is first screened at 0-20mm, 20-150mm and over 150mm using a trommel screen. This facilitates metal recovery where the primary process for non-ferrous recovery is Eddy Current Separators (ECSs).

Post Shredder Separation Technology (PSST) Plant
Recovering residual metals from eddy current separator (ECS) residues using sensor-based detection and air separation.

The PSST plant is a multi-stage recycling plant using:

- A loading shovel is used to load material into a hopper with an automatic belt feeder that controls the feed rate onto inclined conveyer that transfers the material into the plant at rate of about 8 tonnes per hour.
- The first process is magnetic separation to pull out ferrous metals (iron, steel)
- Then a high frequency eddy-current separator removes some residual non-ferrous metals (aluminium, copper, etc.)
- Next an induction sorting machine (ISS) set at high sensitivity removes most of the remaining metals (stainless steel, copper wire and circuit boards etc.)
- A second induction sorting machine (ISS) set at lower sensitivity removes only stainless steel leaving the remaining metals
- Finally, a combined sorting machine (KSS) removes copper wires.
- Hand pickers remove contamination from the final stainless-steel line and residue from metals from the KSS residue missed by the KSS

The Induction Sorting System (ISS) is designed specifically for metal detection and separation based on conductivity. It recovers residual metals that might remain after magnetic and eddy-current separation.

Material is accelerated on a belt into a detection zone. Under the conveyor belt is an inductive sensor coil (or coils) that generates an electromagnetic field. When a conductive object (metal) enters the field, it perturbs the field; the sensor picks that up. After detection, a compressed-air jet ejects the detected metal piece from the conveyor (via targeted deflection). The systems can work on particle sizes from 1 mm up to 200 mm,

The KSS ("Kombinationssortiersystem" / Combined Sensor Sorting System) is a flexible, modular sorting machine. It allows for multiple sensor types on one platform 3D laser, and induction for sorting cables.

Objects pass on a conveyor. Sensors scan each piece. The 3D laser sensor measures shape/height; the induction sensor detects conductivity (i.e., metallic character).

Based on a programmed logic, the system sorts the materials where air jets eject the "good" metal particles.

Shearing oversize scrap

A Vezzani PC-AC hydraulic shear with 1400-tonne cutting force is used to cut oversize scrap into pieces with maximum size of 600mm x 300mm x 300mm. The oversize material is loaded into the shear with a Eurohydromec GF 55/16 pedestal crane. The cut material drops onto a vibrating feeder which transfers it onto an inclined radial stacking conveyer. The plant operator remotely controls the shear, the crane, and the radial conveyor.

Crane loads scrap into the shear feed box / hopper. For shears, the operator panel allows quick adjustment of pressure and stroke. Oversize scrap is loaded by a crane into the inclined feed box. Vezzani's PC / AC shears can be loaded continuously and are designed to minimize downtime.

The cutting cycle can be remotely adjusted to control cutting force, cut material length, and cycle time. The shear uses pre-compression to compact the scrap before cutting, increasing the density and cutting efficiency.

The guillotine descends, shears the scrap, then retracts. Once the shear has completed a cut and the ram is fully retracted, and cut material falls onto the vibrating feeder and then the radial conveyor.

The radial conveyor drops the cut material onto a stockpile which the operator can remotely move in a circular arc to maximise the storage capacity of the radial stockpile.

Sorting and processing non-ferrous scrap

Preparing non-ferrous scrap metal for recycling involves several steps to maximise purity, value, and recyclability.

The first stage is to separate non-ferrous from ferrous and from each other. The methods include manual sorting and cleaning and contaminant removal, such as oils, grease and coolants; plastics, rubber, and insulation; paint or coatings; attached steel or fasteners.

Mechanical processes include cable stripping and baling.

Non-Ferrous Metal Grading

Non-ferrous metals include aluminium, copper and its alloys (brass and bronze, lead and its alloys, zinc, nickel and its alloys, titanium.

Scrap Aluminium Grades

1 Clean Aluminium Grades

Clean Aluminium Extrusion (Clean 6063 / 6000-series)

- Window frames, door frames, architectural profiles
- No steel, plastic, rubber, hinges, screws, or paint
- Highest-value common grade in the UK

Clean Aluminium Sheet / Plate

- Pure or near-pure sheet
- No paint, no plastic film, no contamination
- Commonly factory offcuts

New Production Aluminium ("Clean New")

- Guillotine sheet, swarf from machining (clean)
- Factory scrap free from oil, paint, or alloys

2. Painted / Mixed Aluminium Grades

Painted Extrusion

- 6063/6061 profiles with paint or anodizing
- Must be free from steel fixings
- Lower price than clean extrusion

Old Rolled Aluminium / Old Sheet

- Roofing, siding, pots/pans, signage
- Can have paint or lacquer
- Very common UK grade
- Light mixed grades from general scrap collections

3. Cast Aluminium Grades

Clean Cast Aluminium

- Engine parts, gearboxes, alloy casings
- Free from contaminants steel bolts, bearings, excess oil or rubber

Dirty Cast Aluminium

- Same as above but containing contaminants:
- Requires preprocessing in shredder plant

4. Specialist Grades

- Aluminium Wheels
- Aluminium Radiators
- EC Grade Aluminium Wire
- Turnings / Swarf
- Litho Plates, High-purity 1000-series sheet from printing

Scrap Copper Grades

1. Bright Copper Wire (High Grade)

- 99.9% pure copper, clean, uncoated, unalloyed
- Usually stripped electrical wire ≥ 1.5 mm thick
- No paint, solder, varnish, or insulation

2. No.1 Copper (Clean Copper)

- Clean copper pipe
- Clean bus bars
- Clean tube (no solder, paint, brass fittings)
- Minimum 98–99% purity, No grease, solder, brass, or contamination

3. No.2 Copper (Dirty Copper)

- Copper pipe with solder or paint
- Old heating pipes with small contamination
- Purity: around 94–96%

4. Copper Tank (Hot Water Cylinder)

- Clean copper tank: Foam removed, no brass fittings, no steel
- Dirty copper tank: With insulation, fittings, steel, or contaminants

5. Copper Cable / PVC Wire

- Household wire (30–40% copper)
- Thick armoured cable (higher % copper)
- Low-grade cable (10–20% copper, mixed)

6. Copper Radiators / Copper-Aluminium Radiators

- Copper Radiator (clean), no steel or attachments
- Copper/Aluminium (Cu/Al) Radiators, mixed metals

7. Copper Alloy Grades (Brass & Bronze).

- Brass
 - Clean brass (yellow brass)
 - Mixed brass
 - Gunmetal / phosphor bronze
 - Brass turnings/swarf
- Bronze
 - Clean bronze solids
 - Mixed bronze

Lead Scrap Grade

1. Soft Lead (Clean Lead / Pure Lead)
 - Roofing sheet, Flashings,
 - Cable sheathing (clean)
2. Hard Lead / Mixed Lead
 - Wheel weights
 - Lead pipes with scale or residues
3. Lead Batteries
 - Car/industrial lead-acid batteries

Zinc Scrap Grades

1. Zinc Diecast (Zamak / Mazak)
 - Automotive parts, handles, housings
2. Clean Zinc Sheet
 - Roofing zinc, architectural zinc

Nickel & Nickel-Bearing Alloy Scrap Grades

1. Nickel 200/201
 - Known purity Ni grades (industrial scrap)
2. Monel (Nickel–Copper Alloy)
 - Marine and chemical equipment
 - Typically, 60–70% Ni + Cu
3. Inconel / Incoloy (Nickel–Chromium Superalloys)
 - Aerospace scrap
 - Turbine components
4. Hastelloy & Other Superalloys
 - High-value specialised alloys

Stainless Steel Scrap Grades

1. Stainless 304 (18/8) – Grade 18/8
 - 18% chromium, 8% nickel
 - Sinks, catering equipment, tubing
2. Stainless 316 (Marine Grade)
 - 16% chromium, 10% nickel, 2% molybdenum
 - Marine/chemical applications
3. Stainless 430 (Magnetic Stainless)
 - 17% chromium, no nickel
4. Other common stainless categories:
 - Stainless turnings (swarf), clean or oily
 - Stainless solids (mixed 300-series)
 - Stainless mixed (lower grade, uncertain alloy)

Other Non-Ferrous Scrap Grades

Titanium from aerospace industry
Lead solder
Tungsten carbide

Depolluting end-of-life vehicles (ELVs)

Operatives may use IDIS or other manufacturer guidance to obtain depollution information on the ELV, if required in order to ensure they only accept ELVs that are suitable for the site.

During the cursory inspection operatives shall assess vehicle for health and safety hazards

ELVs accepted onto the site are stored on the secure concreted area at the ELV treatment and storage area (13) where they are contained until they are logged and the necessary details recorded.

The vehicles are transported by forklift to ELV depollution (13) where depollution takes place using the depollution equipment (section 1f. Plant & Equipment) and in line with the current Environment Agency guidance on Appropriate Measures for permitted ELV facilities and Clearway ISP4.16 (App 4).

The depollution process is as follows:

Vehicle Depollution Process

Operation
• Remove battery • Remove fuel filler cap and oil filler cap • Set heater to maximum • Remove wheels and separate lead balance weights • Remove any parts identified as containing mercury
Put vehicle onto support frame
• Drain engine oil and remove oil filter • Drain transmission oil, including rear differential if applicable • De-gas air conditioning unit (if fitted) • Drain coolant • Drain brake fluid • Remove catalyst (if fitted) • Drain washer bottle • Drain brake / clutch reservoir • Drain power steering reservoir (if fitted) • Drain fuel tank • Drain shock absorbers or remove suspension fluid • Replace drain plugs / fit plastic stoppers

Remove vehicle from support frame
• Remove air bags (if fitted, and cannot be deployed in-situ) • Deploy airbags in-situ (if fitted and able to conduct this operation)

- All fluids are stored in sealed double bunded tanks (Area 13).
- Car batteries are stored in secure battery storage shed (NF3 Battery Storage).
- Tyres are stored in the tyre storage bays (NF2).
- After depollution the ELVs are marked in permanent yellow paint with a "D" on the bonnet, driver's side wing or driver's side windscreen.
- The depolluted ELVs are then stored in (ELV) prior to shredding taking place.

Drawings A & B - Illustrate the location of all activities on site and are attached in Appendix 1

f. Plant and Equipment

The following is a list of associated with:

- Shredding and separation scrap metals including treated ELVs
- Recovering residual metals from eddy current separator (ECS) residues using sensor-based detection and air separation
- Shearing oversize scrap
- Sorting and processing non-ferrous scrap
- Collection of ELVs, transport of waste
- Depolluting end-of-life vehicles (ELVs)
- Maintenance of plant and equipment

Danieli Shredder

This is used to shred and separate metals and non-metallics from grade 5 scrap (cars, white goods etc.). The process requires 7/8 personnel.

The plant capacity is 75-120 tonnes per hour with a utilisation of 80%.

The shredder is powered by a 3000 kW electric motor.

A fan and cyclone scrubber remove lighter non-metallic materials.

Non-ferrous metals are separated from heavy non-metallics using Eddy Current Separators. Ferrous metals are recovered by a series of electromagnets.

The separation plant uses about 800 kW.

Lynxs Shredder (currently this shredder is not operational)

This is used to shred and separate metals and non-metallics from grade 5 scrap (cars, white goods etc).

The process requires 5/6 personnel.

The plant capacity is 50-70 tonnes per hour with a utilisation of 75%.

The shredder is powered by an 1875 kW electric motor.

Fans and cyclones remove lighter non-metallic materials. Non-ferrous metals are separated from heavy non-metallics using Eddy Current Separators (ECS).

Ferrous metals are recovered by a series of electromagnets.

The separation plant uses about 500 kW.

Post Shredder Technology (PST) Plant

This is used to separate and recover residual metals from Eddy Current Separators (ECS) residues.

The process requires 4/5 personnel.

The ECS separators on the shredder plants are unable to recover stainless steel, copper wire and low conductivity non-ferrous metals.

The PST plant uses powerful rare earth magnets, high frequency eddy current separators, sensor-based induction separators, and laser-based shape detection separators to recover residual metals that could not be recovered using conventional magnetic or eddy current separators.

A second PST plant is scheduled for commissioning early in 2026. It will be used to process the 0-30mm ECS residues

Vezzani Shear

This is used to cut oversized heavy scrap into grade 1 scrap.

The process uses one operator.

The plant has an operating capacity of 20-25 tonnes per hour.

The machine is electro-hydraulic and has a 1400 tonne cutting force.

It is powered by 5 x 110 kW electric motors. It is loaded with a Eurohydromec GF 55/16 Pedestal Crane which is powered by an 80-kW electric motor.

The processed material is removed from the shear with a Vezzani steel belted radial stacking conveyor.

Balers & Non-Ferrous Equipment

Balers can be used for processing non-ferrous metals. The Harris TGS 57 90 kW Electrohydraulic baler produces 7-10 tonnes per day of baled aluminium, stainless steel or copper. The McIntyre 1 kW Electro-hydraulic baler produces 2-4 tonne per day of baled copper.

In the non-ferrous shed there is a Deltax cable stripper, a Shrink Wrap Machine, and a Niton XL2 XRF Analyser.

Material Handlers

Most of the material is handled using mobile material handlers (360-degree excavator type) fitted with either grabs or magnets. Currently the company use; four Sennebogen 835s material handlers in the yard and one Sennebogen 870 material handler on the quay for loading and unloading ships; and five Liebherr material handlers, one of which is fitted with a Le Bounty hydraulic shear.

Forklifts

The company has the following forklifts: 8 Hyster ranging from 2.5 to 10 tonne capacity; 1 Toyota 3 tonne; 1 Caterpillar 3 tonne; 1 DCE 3 tonne; 1 Yale 2.5 tonne and 1 Linde 2.5 tonne; 1 Apache 3 tonne.

Loading Shovels

The company uses large loading shovels for handling/ moving materials that cannot be readily moved by mobile cranes and for loading trucks.

The company also has 1 Caterpillar and 4 Volvo loading shovels. 3 JCB Loadalls and 1 JCB Robot are used for loading containers and for cleaning the yard and around the shredder downstream.

Lorries

The company also has 3 Volvo shunter trucks used to move materials within the site plus 1 Volvo shunter truck in reserve.

There are 1 skip lorry, 2 roll-on/roll-off truck, an articulated truck fitted with a grab. These are normally used to collect materials from suppliers.

Two double-deck car transporters and one single-deck transporter are used for ELV collection.

The double-deck transporter has capacity for 3 ELVs and the single deck transporter has capacity for 2 ELVs

There are 3 articulated lorries with ejector trailers normally used to transport waste to landfill, but they can also be used for collection scrap.

The company has two tankers, one of which is a vacuum tanker, which are used for handling liquid waste.

The vacuum tanker is used for cleaning the drains and interceptors.

ELV Depolluting Rig

SEDA Double Fixed Station Rig with complete tank farm allowing 2 vehicles to be depolluted at the same time with 2 drainage systems for oils, coolants, brake fluid, power steering, washer fluid, fuels, gearbox oil and differential oils. With this system it is possible to depollute up to 5 vehicles per hour. Two Corghi Tyre removal machines are used to remove tyres from the rims.

A Cat 320 Powerhand is used to remove catalytic converters, air conditioning and air bag removal

Miscellaneous Plant and Machinery

Material entering the site is scanned for radiation using the Radiation Solutions Inc RS200 “gate” detectors and for scanning materials loaded into containers and a ship’s hold, a RS11 handheld radiation detector.

In addition to fire hydrants, hoses and extinguishers located at various positions on the site there are 2 Dennis Fire Engines for firefighting, located in the main carpark.

There are 2 JLG Boom Lift cherry pickers for access at height; a Kato mobile crane; a Fabcon Container Tilter for loading 20ft containers; and a tractor fitted with brush for sweeping the yard.

All plant and equipment on site are serviced, and calibrated where necessary, on a regular basis and the associated documentation retained on site.

g. Waste Storage

All solid wastes, including ELVs (before and after depollution are stored in concreted areas outdoors, except for; high value metals; automotive batteries and fluff-light shredder fraction, which are stored inside dedicated buildings. The surface water from the concrete areas enters the drainage system through silt traps then through full retention interceptor before discharge.

Liquid wastes, including these from depolluting ELVs are stored in dedicated bunded area (13) constructed with reinforced concrete walls, or on bunded tanks Depollution takes place in the depollution building.

Batteries removed from ELVs are moved to the non-ferrous shed where there are stacked on pallets in layers separated by corrugated cardboard sheeting. The full pallets are shrink wrapped before being transported to the dedicated battery storage building (NF3) to await dispatch.

Depolluted cars are stored on stoned hard standing.

All wastes are stored securely.

h. Waste Quantity Measurement Systems

All wastes are weighed in and out of the site and all drivers must report to weighbridge operator, who records all waste receipts and dispatches in the company computer system.

The quantities / volumes of all hazardous wastes consigned from the site are recorded and kept. All weighing equipment is calibrated annually.

i Hours of Operation

The site is open to receive and dispatch scrap metals as follows:

Monday to Friday:	8.00am – 5.00pm
Saturday	8.00am – 1.00pm

Overtime is worked for processing material within the closed site:

Monday to Thursday:	6.30am – 8.00am and 5.00pm – 7.00pm
Friday	6.30am – 8.00am
Saturday	1.00pm – 2.30pm
Sunday	8.00am – 2.30pm

J Staffing and Supervision

All staff are adequately trained to carry out all activities on site, including depollution activities, driving mobile plant and machinery, operating processing plant etc. in a safe and environmentally sound manner ensuring pollution risk to the environment is minimised and controlled.

All activities shall take place as detailed in this working plan and the waste management licence.

The Group HR Manager, assisted by the H&S Officer ensure that all employees are fully trained for their role in the business.

The site is supervised and managed by an experienced site manager.

The Commercial Manager has a WAMITAB certificate (App 3), and the site manager is currently going through technical competency training.

3. Site Engineering, containment and drainage systems

Sealed drainage directs all liquids and run off from the areas detailed below through the oil interceptors as detailed in App 2, Drainage Plan (A02, Rev-J):

- The operational yard areas and all covered areas are fully concreted
- Bunded concreted storage area for fluids are located in Areas 13 and NF2 (App1, Drawing B).

In addition, see section g) *Waste Storage above*.

4. Site Infrastructure

a. Provision of site identification board

A site identification board is located at the left-hand side of the site entrance (RVP1) where it can be read by site users and other interested parties.

The board contains the details required in the waste management licence and permit:

- the site name, the site operator's name, principal address and telephone number
- the name, address and telephone number of by the NIEA
- telephone numbers and addresses of key personnel for emergency use
- the opening hours of the site
- the fact that the site is licensed/permitted by the NIEA

b. Site Security

The site is screened by a steel-clad fence approximately 4 meters high along the north, south and west boundaries. Shrubs and trees are planted on the west boundary outside the fence along East Twin Road.

The east boundary facing Musgrave Channel comprises plastic-coated chain-link fencing mounted on concrete posts approximately 2.8 meters high.

The main entrance gates are of steel-clad construction topped with steel mesh approximately 4 meters high. The gates to Musgrave Wharf are plastic coated chain link attached to a steel frame that is 2.8 metres high.

All fencing, gates and any other barriers or security measures to prevent unauthorised access to the site are maintained in full working order, and any damage which impairs their effectiveness shall be repaired as soon as practicable.

Draft Example Working Plan

5. Amenity Management and Reporting

a) Monitoring and Control of Mud and Debris

The nature of the material onsite is unlikely to give rise to mud but there is a low risk of debris. Should any mud or debris escape onto the roadway it will be swept up promptly. The concrete yard is swept regularly and cleaned down at the end of each working week.

b) Monitoring and Control of Leaks and Spillages

- I. All cars and parts are stored as detailed in section g) Waste Storage above.
- II. Spill kits are available at the locations marked on the site operations plan to deal with small spillages.
- III. All surface water passes through the oil interceptors where contaminants are removed.
- IV. Silt and debris are contained in the sealed drainage system and subsequently through the sumps in the silt traps which allows the sediment to settle.
- V. This sumps in the silt traps are monitored and is periodically inspected and cleaned out by the company's tank cleaning operation.
- VI. Major leaks or spillages which may run to the interceptor shall be isolated with bungs to ensure no spillages or contaminants that could cause pollution escape beyond the interceptor.

c) Monitoring and Control of Dust, Fibres and Particulates

Due to the nature of the work currently undertaken on this site it is unlikely that dust, fibres and particulates will be produced.

d) Monitoring and Control of Odours

Due to the nature of the work currently undertaken on this site no odours are produced that would be considered a nuisance.

e) Monitoring and Control of Noise

The company uses and external environmental noise consultant to carry out an annual noise survey and provide an annual report. The company has its own noise measuring equipment which allows a trained person to carry out a noise assessment where there is a potential area of concern. If there is a concern following the internal investigation the matter will be referred to the external noise consultant.

f) Monitoring and Control of Pest Infestations

Due to the nature of the work currently undertaken on this site no waste is produced that would attract pests, scavenging birds or scavengers to the site. The site utilises the services of a contracted, professional pest control specialist (Vergo UK). The company is engaged to perform scheduled inspections and monitoring to prevent activity and provide immediate treatment if any evidence of pests, scavenging birds, or other scavengers is detected. All scheduled visits are recorded and held on site for review.

g) Monitoring and Control of Litter

Due to the nature of the work currently undertaken on this site the generation of litter is not expected.

The yard is swept daily at the end of each working day to ensure that any unaccounted-for litter is removed from the site.

Draft Example Working plan

h. Fire Action Plan

Accident and emergency plans have been prepared for the site, and a fire actions plan is presented in (App 2). Additionally, a copy shall be held in the site office and available for inspection. This plan covers possible emergencies and requires actions.

In the event of a fire at the site, the alarm shall be raised and site operatives evacuated to the fire assembly point.

Emergency procedures are also in place for events like power failure, gas explosions, traffic accidents, machinery failure, spillages and leaks. Site operatives will be familiar with the procedures and their responsibilities in the event of an emergency.

All incidents and accidents are to be reported in the site diary and accident report book.

Draft Example Working plan

1. Further Site Information

Site Plan (App 1 Drawing B) shows the locations of the main access points **A1** to **A4**; along with the various stockpiles numbered 1 to 29; liquid storage tanks; compressed gas and volatile liquid storage.

The attached Site Data (App 2) for Clearway Belfast 2025, provides details of the stockpiles and equipment available for moving materials and equipment in case of a fire.

4.1 Fire Precautions

Several fire precautions are carried out across site. These include:

- Monthly fire safety audits.
- Weekly site inspections incorporating fire safety inspections.
- No smoking policy in place on site and a designated smoking area has been allocated in main carpark.
- Yearly service of all fire extinguishers.
- Yearly hydrant pressure checks completed.
- More than 20 trained fire marshals on site

4.2 Fire Equipment

There are several different variants of fire equipment strategically placed around the site to help control a fire, these include:

- Fire extinguishers (foam, dry powder, CO2, lithium-ion) – total of 75 across site.
- Fire hydrants – total of 10 across site.
- Mobile 1000-litre IBC with high pressure pump function.

On site plan drawing B, the fire hydrants are indicated H

The fire packs (extinguishers/hose reels) are indicated F

4.3 Site Drainage

The attached Site Drainage Plan (App1 Drawing C) shows the four site drainage layouts, including the locations of the interceptors and discharge points.

This plan shall be reviewed annually and updated where necessary.

Appendix 2

Fire Action Plan

Scope

- In the event of a fire this the procedure for evacuating all facilities of Clearway Disposals and report to required authorities and company personnel.

Responsibilities

- The Operations Manager and the Commercial Manager are responsible for the implementation of this procedure.
- The Operations Manager and the Commercial Manager are responsible for ensuring that operatives on the site are trained (& training documented) on this procedure.
- The Operations and Commercial Manager are responsible for ensuring that the trained operatives adhere to this procedure at all times.

Method

On discovering a fire, you must:

1. Sound the fire alarm.
2. Evacuate the premises/work area, do not stop to collect personal belongings.
3. Assemble in the nominated Fire Assembly Point (RV1 or RV2)
4. Ensure that fire wardens have noted your name and are aware that you have reported to the assembly point.
5. Await further instructions from your manager or supervisor.

Personnel on site

Weekdays: 62 persons including 5 lorry drivers

Weekends: 10-20 persons

Do not under any circumstances re-enter the site unless instructed to so by the person in charge of the situation.

You should only attempt to tackle a Fire under the following circumstances:

1. Your life is in danger, and your exit is blocked by the fire.
2. If it is only a small fire such as a piece of electrical equipment, and you are trained to use fire extinguishers, then you may attempt to control the fire using the correct extinguisher.

Remember if in doubt do not try to tackle the fire, **SOUND THE ALARM** and **EVACUATE** the site.

SAFETY ALWAYS COMES FIRST

Contacts in the case of a Fire / Emergency Evacuation at Clearway, Belfast, East Twin Road, Belfast BT3 9EN

Contact	Number	Contact Names	Email Address	Who should make contact?
PSNI Fire Ambulance Coastguard	999	N/A	N/A	Whoever notices the emergency first, and/or Operations/Commercial Manager
Harbour Police	028 9055 3000	Duty Sergeant	N/A	As above
NIEA	028 9056 9758 [REDACTED] 028 9056 9491 [REDACTED] 0800 807 060	[REDACTED] [REDACTED] Out of Hours	[REDACTED] daera-ni.gov.uk [REDACTED] aera-ni.gov.uk emergency-pollution@daera-ni.gov.uk	As above or [REDACTED] [REDACTED]
Belfast Harbour Commissioners	028 9055 4422 [REDACTED] Via Harbour Police	[REDACTED] Duty Compliance Officer	[REDACTED] belfast-harbour.co.uk safety@belfast-harbour.co.uk	As above or [REDACTED] [REDACTED]
Clearway Disposals Ltd	[REDACTED]	[REDACTED] Commercial Manager	[REDACTED] clearway-group.co.uk	Whoever notices the emergency first and/or Operations/ Commercial Manager
Clearway Disposals Ltd	[REDACTED]	[REDACTED] Operations Manager	[REDACTED] clearway-group.co.uk	As above

Clearway Disposals Ltd		Owner	clearway-group.co.uk	As above
Clearway Disposals Ltd		Owner	clearway-group.co.uk	As above
Clearway Disposals Ltd		Managing Director	@ clearway-group.co.uk	As above

Site Data: Clearway Belfast 2025 Stockpile

No.	Description	Max Tonnes	Risk 0-5	Burn Time
1	Steel Swarf	300	2	1 day
2	Frag Feed (ELV)	3000	3	2 to 3 days
3	Frag Feed	3000	3	1 day
5	Light Shredder Residue	500	3	1 day
6	Non-Ferrous from ECS	50	0	N/A
7	No. 1	3000	0	N/A
8	Steel Plate	2000	0	N/A
9	ECS Residue	3000	2	2 to 3 days
10	ECS Heavy Fines Residue	300	0	N/A
11	Shredded Steel	5000	0	N/A
12	Zorba	200	0	N/A
13	Unprocessed ELVs	150	4	3 to 4 hours
14	Off-loaded material	100	3	3 to 4 hours
16	Area for new PST plant.	N/A	0	N/A
17		N/A	0	N/A
18	Dock Bottom	8000	0	N/A
19	Oversize for shearing	2000	0	N/A
20	Sheared Ferrous	1500	0	N/A
21	PST Residues	100	1	1 to 4 hours
22	Shredded Steel	500	0	N/A
23	Mixed Shredder Residue	200	3	1 day
24	ECS Residue 0-30 mm	9000	2	2 to 3 days
25	ECS Residue 30-100 mm	20	2	3 to 4 hours
26	ECS Residue 20- 100 mm	20	2	3 to 4 hours
27	ECS Residue 30-100 mm	20	2	3 to 4 hours
28	Non-Ferrous (Aluminium)	100	0	N/A
29	Non-Ferrous	100	0	N/A

The Fire Plan stockpile quantities represent maximum pile sizes by material type and location and do not represent concurrent site-wide storage quantities. Please refer to App1_Drw B

Materials Handling Machinery for Use in Case of Fire

Material can be moved using Liebherr/ Sennebogen mobile cranes (materials handlers) (360-degree excavator type) fitted with hydraulic grabs.

The Liebherr machines comprise 3 x Liebherr's 954s and one 934 on tracks: 1 x LH40s on wheels and 1 x LH60 on wheels.

The Sennebogen machines are 2 x 835s and 1 x 870.

The Fuchs-Terex machine is a 1 x 360s. There are 4 shunter trucks, and 4 articulated trucks for transporting material.

For smaller scale material movement, there is also a number of loading shovels, telescopic handlers.

Forklifts with capacity 2.5 to 10-tonnes are available for equipment unloading or movement.

I Safety and Emergency Procedures

- All activities shall be carried out in such a manner as to prevent fire and pollution incidents.
- See sections *b)* and *h)* above

2. Site Records

a) Provision of a Site Diary

A digital site diary will be kept and maintained by the site manager. Any important information regarding site activities will be recorded in it. In the absence of the site manager the Managing Director will perform this task, the H&S Officer & Environ Manager may also access the diary if required.

b) Security and availability of records

All records are kept securely, backed up on Cloud storage and are available for inspection.

c) Records of waste movements

Records of waste movements into and out of the site will be kept on company computer system. Hard copies of external documents are filed in the office. All records are available for inspection.

[REDACTED]

From: [REDACTED]@clearway-group.co.uk>
Sent: 27 February 2026 12:52
To: [REDACTED]
Subject: Re: Agreed FP amount and FP mechanism template 2026

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Hi [REDACTED]

Thanks for checking this for us. I had submitted it to our financial team for processing; they asked me to query it. Have a good weekend.

Aye,

From: [REDACTED]@daera-ni.gov.uk>
Sent: 27 February 2026 11:15
To: [REDACTED]@clearway-group.co.uk>
Subject: RE: Agreed FP amount and FP mechanism template 2026

Good morning [REDACTED]

I have looked up the copy of the bond we have on file (Reference: [REDACTED]), and you are correct it does expire on 5th March 2027, and covers the total FP calculation amount. Your supplied Financial Provision has now been reviewed and forwarded for approval. You are not required to do anything further regarding financial provision at this time. Thank you for submitting the FP calculations for the sites.

Apologies for the error in dates on my side.

Many thanks

[REDACTED]
Waste Management Licensing Team

Regulation Unit | NIEA

17 Antrim Road | Tonagh | Lisburn | Co. Antrim | BT28 3AL

☎ (028) 9262 3110 (ext 30110)

[REDACTED]@daera-ni.gov.uk | www.daera-ni.gov.uk

From: [REDACTED]@clearway-group.co.uk>
Sent: 26 February 2026 16:55
To: [REDACTED]@daera-ni.gov.uk>
Subject: Re: Agreed FP amount and FP mechanism template 2026

Hi [REDACTED]

Sorry to be a pain, but can I check our bond expires this year. I have attached the previous one from Jan 2024 and it seems to be valid until 2027. I am very likely misinterpreting it. Thanks again.

Aye,

From: [REDACTED]@daera-ni.gov.uk>
Sent: 26 February 2026 15:40
To: [REDACTED]@clearway-group.co.uk>
Cc: [REDACTED]@daera-ni.gov.uk>; [REDACTED]@daera-ni.gov.uk>
Subject: Agreed FP amount and FP mechanism template 2026

Good afternoon [REDACTED]

Thank you for submitting the 2026 FP calculation for your sites **WML 31/20** and **P0483/15A** at East Twin Road, Belfast Harbour Estate, Belfast, BT3 9EN. This figure has now been agreed. As the FP calculations for each of your sites has now been agreed, you are required to provide a suitable mechanism to cover this amount.

Agreed FP calculations for your sites are as follows:

WML 13/72: [REDACTED]

WML 13/65/T: [REDACTED]

WML 30/11: [REDACTED]

WML 31/20 & P0483/15A: [REDACTED]

The **total** amount required to be covered by your FP mechanism is [REDACTED] Please find attached the updated Bank Bond template for reference. Your current bank bond expires on 5th March 2026.

Many thanks,

Waste Management Licensing Team

Regulation Unit | NIEA

17 Antrim Road | Tonagh | Lisburn | Co. Antrim | BT28 3AL

☎ (028) 9262 3110 (ext 30110)

██████████@daera-ni.gov.uk | www.daera-ni.gov.uk



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Norlin Airlan Environment Agency



An Agency within the
**Agriculture
and Rural A**
www.daera-ni.gov.uk

From: [REDACTED]@clearway-group.co.uk>
Sent: 13 April 2026 10:57
To: [REDACTED]
Cc: [REDACTED]
Subject: Surface Water Analysis Results – April 2026 – Clearway Belfast
Attachments: [REDACTED].pdf

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Dear [REDACTED],

We trust you are well.

Please find attached the latest water analysis results for the East Twin Road site in Belfast.

The analysis of the four samples collected on 2nd of April 2026, is now complete. We are pleased to report that the results for pH, Suspended Solids (SS), and Visible Oil and Grease (V O&G) are consistent across all locations. No deviations were noted, confirmation for the results are attached.

Lab Ref	Sample Location	pH	SS (mg/l)	V O&G (%)
[REDACTED]	No1 Garage	7.27	[REDACTED]	<1 No
[REDACTED]	No2 Original	7.58		<1 No
[REDACTED]	No3 New Frag	6.45		<1 No
[REDACTED]	No4 Quay	7.57		<1 No

If you have any questions regarding these findings, please let us know.

Aye,

Clearway
Metal Recycling

Hammond Lane
Metal Company
Part of the Clearway Group

Tel: 02890 457556 Ext 227 | 07802764245 | [REDACTED]@clearway-group.co.uk

Amendment to report: -

Clearway
East Twin Road
Belfast
BT3 9EN

McQuillan Envirocare Ltd t/a McQuillan Environmental
Caulside Drive, New Park Industrial Estate
Antrim, BT41 2DU

Tel: (028) 9446 6708

Fax: (028) 9442 9580

www.mcquillancompanies.com

[REDACTED]@mcqcos.com

MCQ Job Number	[REDACTED]	Sample Receipt Date	02/04/2026
MCQ Quote Number	[REDACTED]	Date Analysis Started	02/04/2026
Purchase Order Number	[REDACTED]	Completion Date	13/04/2026
No. of Samples	4	Turnaround Time	10 working days

Dear [REDACTED]

Analysis of your sample(s) is now complete and we have pleasure in enclosing the appropriate test report.

All analysis was completed within McQuillan Environmental Analytical Laboratory (MCQ) unless otherwise specified. Results relate only to the items tested. Any analysis that was subcontracted to an approved laboratory is indicated by 'S'. Please refer to the table at the end of your test certificate for explanations of sample deviations.

Where sample data is provided by the customer, the results relate to the sample supplied and on the basis that this data is correct. Incorrect sampling dates and/or sample information will affect the validity of results. This Test Certificate supersedes any version previously issued by the laboratory. The report shall not be reproduced except in full without approval of the laboratory.

Should you have any queries regarding this report(s) or any part of our service, please contact Sample Booking on 028 9448 3195 who will be happy to discuss your requirements.

Thank you for using our Laboratory and we look forward to receiving your next samples.

Yours Sincerely [REDACTED]

Report Authorised [REDACTED]

Position: Laboratory Technical Supervisor

Date Issued: 13/04/2026



4209

Certificate: [REDACTED]

Issue No.: 1

Lab Ref	Sample Details	Sample Date	Method No.	Test	Result	Units	ACC	Lab	Sample Deviations
[REDACTED] Time Sampled: 14:30	No1 Garage [REDACTED] Sample Matrix:	01/04/2026 Surface Water	SAM004	pH	[REDACTED]	Units	Y	McQ	
			SAM001	Suspended Solids	[REDACTED]	mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease	[REDACTED]	%	N	McQ	
			Analyst Comment:						
[REDACTED] Time Sampled: 14:30	No2 Original [REDACTED] Sample Matrix:	01/04/2026 Surface Water	SAM004	pH	[REDACTED]	Units	Y	McQ	
			SAM001	Suspended Solids	[REDACTED]	mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease	[REDACTED]	%	N	McQ	
			Analyst Comment:						
[REDACTED] Time Sampled: 14:30	No3 New Frag [REDACTED] Sample Matrix:	01/04/2026 Surface Water	SAM004	pH	[REDACTED]	Units	Y	McQ	
			SAM001	Suspended Solids	[REDACTED]	mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease	[REDACTED]	%	N	McQ	
			Analyst Comment:						
[REDACTED] Time Sampled: 14:30	No4 Quay [REDACTED] Sample Matrix:	01/04/2026 Surface Water	SAM004	pH	[REDACTED]	Units	Y	McQ	
			SAM001	Suspended Solids	[REDACTED]	mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease	[REDACTED]	%	N	McQ	
			Analyst Comment:						

Sample Deviations:

Sample Deviations Legend - Results may be compromised if the following deviations apply			
Comment	C	Incorrect Container	‡
Container with Headspace provided	8	Insufficient sample volume	Ě
BOD Overdiluted, therefore result indicative only	\$	BOD Underdiluted, therefore result indicative only	#
High Chloride concentration, COD could not be determined	§	Holding time exceeded due to sampled on date/time	@
Holding time exceeded in Lab	±	Holding time exceeded due to delayed instructions	&
Sample integrity Jeopardized in receipt	∅	Reporting limit raised due to sample matrix interference	⌘
Container with headspace provided for Volatiles analysis	¥	Deviation from method	◇
Matrix Interference	∞	Unsuitable sample	Θ

[REDACTED]

From: [REDACTED]
Sent: 17 April 2026 11:48
To: [REDACTED]
Cc: [REDACTED]
Subject: Annual report letter
Attachments: Annual report letter.pdf

Hi [REDACTED]

Thank you for sending through the amended version of your 2025 annual report which is now agreed with some comments, as per the attached annual report response letter. Please note the requirement for you to now prepare and submit a groundwater baseline report.

We are still to review and respond regarding the 2024 report which we will provide in due course.

Many thanks

[REDACTED]
Waste Management Licensing Team
Regulation Unit | NIEA
17 Antrim Road | Tonagh | Lisburn | Co. Antrim | BT28 3AL
(028) 9056 9758 (ext 69758) | 07976 799513
[REDACTED] [@daera-ni.gov.uk](mailto:[REDACTED]@daera-ni.gov.uk) | www.daera-ni.gov.uk



Northern Ireland Environment Agency
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Gníomhaireacht de chuid na Roinne
Talmhaíochta, Comhshaoil
agus Gnóthaí Tuaithe

An Agency wi
Fairmír
an' Kín

Our Reference: P0483/15A

Clearway Disposals Ltd
East Twin Road
Belfast Harbour Estate
Belfast
BT3 9EN

Waste Management Licensing

Lisburn NIEA

17 Antrim Road

Tonagh

Lisburn

BT27 3AL

Tel: 028 9056 9758

17 April 2026

[\[REDACTED\]@daera-ni.gov.uk](mailto:[REDACTED]@daera-ni.gov.uk)

Dear Sirs,

Annual Monitoring Report 2025

Clearway Disposals Ltd – East Twin Road, Belfast Harbour Estate

The NIEA acknowledges receipt of the 2025 Annual Monitoring report for Clearway Disposals Ltd. We make the following comments:

Environmental Monitoring

The report confirms that only three monitoring events were undertaken during the reporting year, rather than the four quarterly rounds required by the permit. An explanation has been provided but future monitoring programmes must ensure full compliance with the required monitoring frequency.

A number of exceedances of the suspended solids emission limit were recorded during the year. The NIEA notes commitment to increased inspection and maintenance regimes and planned engineering improvements.

Compliance and inspections

The report recorded non-compliances identified during inspections in June and September 2025, including issues relating to waste storage and site infrastructure. All non-compliances must continue to be fully and accurately recorded within annual monitoring reports with confirmation of corrective actions and closure where applicable.

Water use and efficiency

An increase in potable water consumption during the reporting year has been identified and an explanation provided. The permit requires the implementation of measures to improve water efficiency, and we note the actions outlined within the recommendations section.

Sustainability at the heart of a living, working, active landscape valued by everyone.



Quarterly returns

A comparison of the submitted quarterly returns against the Annual Environmental Monitoring Report indicates that the total waste received figures do not align, with a discrepancy of approximately 3,140 tonnes between the two datasets.

Groundwater baseline report

The permit requires a groundwater baseline report to be prepared and submitted every five years. This report is now due; however no reference to this has been made within the Annual Environmental Monitoring Report. This should now be prepared and submitted to NIEA in accordance with the permit conditions and schedule. Please confirm the proposed timeline for the submission of this report to NIEA.

Future reporting

The inclusion of recommendations aimed at improving site performance and monitoring practices is noted and should continue to address recurring issues and compliance risks.

If you require any clarification on the content of this letter, please don't hesitate to contact me on 028 9056 9758 or at [REDACTED] [@daera-ni.gov.uk](mailto:[REDACTED]@daera-ni.gov.uk)

Yours faithfully

[REDACTED]

[REDACTED]
Waste Licensing

***Sustainability** at the heart of a living, working, active landscape valued by everyone.*



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Gníomhaíocht de chuid na Roinne
**Talmhaíochta, Comhshaoil
agus Gnóthaí Tuaithe**

An Agency w/in the Department of
**Fairmin, Environment
an' Kintra Matthers**

INVESTORS IN PEOPLE
We invest in people Standard

[REDACTED]

From: [REDACTED]@clearway-group.co.uk>
Sent: 26 May 2026 09:03
To: [REDACTED]
Cc: [REDACTED]
Subject: Clearway East Twin Road, Belfast Harbour
Attachments: 26MAY2026-S6-Clearway Belfast.pdf

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Good morning,

Further to our previous communications we have attached a S6 and we would like to provide a brief update.

The incident involved a major fire within a pile of baled vehicles and scrap metal. The emergency response was commanded by the Northern Ireland Fire & Rescue Service, with significant water deployment from land-side and harbour-side firefighting resources. We have requested NIFRS logs and initial reports by email.

The emergency water deployment was undertaken for life safety, protection of emergency responders, boundary cooling, protection of neighbouring premises and harbour infrastructure, and prevention of escalation.

The estimated volume of firefighting water deployed was exceptional and exceeded the normal design capacity of site drainage and oil-water interceptor infrastructure. As a result, potentially contaminated firewater may have entered or affected site drainage routes and/or the surrounding harbour-side water environment. The extent and impact are currently being assessed.

Clearway is taking immediate steps to:

- secure the affected area and maintain safe exclusion zones;
- protect employees, contractors, inspectors and visitors from residual dust and unstable material risks;
- prevent further uncontrolled movement of potentially contaminated water, ash or residues where safe and practicable;
- arrange attendance by our drainage team to inspect, pump, clean and reinstate affected interceptors and drainage infrastructure;
- preserve incident records, CCTV, site plans, drainage plans, emergency response information and relevant correspondence;
- cooperate fully with NIEA, HSENI, NIFRS and Belfast Harbour;
- develop a controlled recovery plans.

Clearway recognises the seriousness of the incident and is treating this matter as a priority. We would be grateful if NIEA could confirm the incident reference number and any immediate requirements or instructions pending today's inspection.

Aye,



Tel: 02890 457556 Ext 227 | 07802764245 | [REDACTED]@clearway-group.co.uk

Schedule 6 - Notification

This page outlines the information that the Operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the PPC Regulations.

Part A

Permit Number	P0483/15A
Name of Operator	Clearway Disposals Ltd
Location of Installation	East Twin Road, Belfast BT3 9EN
Time and date of the detection	24/05/2026

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or fugitive emission which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and Time of the event	
Reference or description of the location of the event	Irish Grid Reference J 3633 7632
Description of where any release into the environment took place	Musgrave Channel
Substances(s) potentially released	Potentially contaminated firewater
Best estimate of the quantity or rate of release of substances	Extraordinary water volumes exceeded normal drainage/interceptor capacity
Measures taken, or intended to be taken, to stop any emission	Controls and recovery actions now being implemented.
Description of the failure or accident.	Potential environmental incident arising from emergency firefighting water deployment following major fire at East Twin Road, Belfast Harbour.

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period
None specified	

(c) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B to be supplied as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the installation in the preceding 24 months.	

Name*	
Post	SHEQ Manager
Signature	
Date	26/05/2026

* authorised to sign on behalf of Aughtim Landfill Ltd

From: [REDACTED]
Sent: 26 May 2026 08:25
To: [REDACTED]
Subject: FW: Fire at Clearway Belfast

[REDACTED]
Waste Management Licensing Team
Regulation Unit | NIEA
17 Antrim Road | Tonagh | Lisburn | Co. Antrim | BT28 3AL
(028) 9056 9758 (ext 69758) | 07976 799513
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Gníomhaireacht de chuid na Roinne
Talmhaíochta, Comhshaoil
agus Gnóthaí Tuaithe

An Agency wí
Fairmir
an' Kí

From: [REDACTED]@clearway-group.co.uk>
Sent: 24 May 2026 19:43
To: G_DRD NIEA Emergency Pollution <emergency-pollution@daera-ni.gov.uk>
Cc: [REDACTED]@clearway-group.co.uk>; [REDACTED]@clearway-group.co.uk>; [REDACTED]@clearway-group.co.uk>; [REDACTED]@daera-ni.gov.uk>; [REDACTED]@daera-ni.gov.uk>
Subject: Fw: Fire at Clearway Belfast

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Good evening

Apologies for not sending the message to the out of hours service. I am on holiday in France at present so [REDACTED] will assist you on environmental and H&S matters and [REDACTED] on operational matters.

[REDACTED]

Sent from [Outlook for Android](#)

From: [REDACTED]@clearway-group.co.uk>
Sent: Sunday, May 24, 2026 5:36:28 pm
To: [REDACTED]@daera-ni.gov.uk>; [REDACTED]@daera-ni.gov.uk>; [REDACTED]@daera-ni.gov.uk>
Cc: [REDACTED]@clearway-group.co.uk>; [REDACTED]@clearway-group.co.uk>; [REDACTED]@clearway-group.co.uk>
Subject: Fire at Clearway Belfast

Good afternoon

I regret to inform you that a major fire broke out at the Clearway site at East Twin Road. I am on holiday at present with limited internet connection. I spoke with [REDACTED] over an hour ago and he indicated that while the fire was intense but looked like it was under control. However, any combustible materials are likely to continue to burn, albeit under a degree of control by NIFRS.

[REDACTED]

Sent from [Outlook for Android](#)

[REDACTED]

From: [REDACTED]
Sent: 29 May 2026 15:54
To: [REDACTED]
Cc: [REDACTED]
Subject: Site Inspection form
Attachments: CAR2 Form WML 31-20 26.05.26.pdf

Thanks for meeting us – here is a site inspection report.

Regards

[REDACTED]

☎ (028) 9056 9491 (ext 69491) | ✉ [REDACTED]@daera-ni.gov.uk | www.daera-ni.gov.uk

Waste Regulation Unit
Northern Ireland Environment Agency
17 Antrim Road | Tonagh | Lisburn | Co. Antrim | BT28 3AL
(028) 9056 9491 (ext 69491)
[REDACTED]@daera-ni.gov.uk | www.daera-ni.gov.uk



Northern Ireland Environment Agency
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Name of site	Name of Operator/Licence holder	WML Number
Clearway Disposals Ltd	Clearway Disposals Ltd	WML 31/20 & P0483/015A

Name of officers	Date	Time	
[REDACTED]	26/05/26	In: 10:51	Out: 12:15
[REDACTED]			

Council Area	Weather Conditions
Belfast City	Dry, Cloudy

Type of site	Non-Hazardous Treatment & Transfer Scrap Metal	Type of inspection	Fire on site
---------------------	--	---------------------------	--------------

Site operational Status	Site life Status
Receiving Waste	Operational

Site areas / Phase inspected	Full
-------------------------------------	------

Inspection Results NI= Not inspected NA= Not applicable 0= Compliant 1-3 Non-compliant

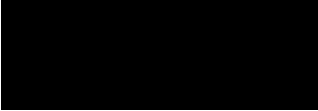
1	NI	Specified Operations	14	2	Fires on site
2	NI	Permitted Waste types	15	0	Waste acceptance and control Procedures
3	NI	Permitted Waste Quantities	16	0	Waste quantity measurement system
4	NI	Hours of Operation	17	0	Storage of specified waste
5	0	Staffing and Supervision	18	0	Monitoring and control of gases/ vapours/aerosol
6	0	Availability / understanding of licence / Working Plan	19	0	Monitoring/ control of dusts / fibres/ particulates
7	0	Attendance of Technically Competent Person	20	NI	Monitoring and control of odours
8	NI	Maintenance of Financial Provision	21	NI	Control of noise
9	NI	Engineered site containment / drainage system	22	NI	Control of pest infestations
10	NI	Site Identification Board	23	NI	Control of litter
11	NI	Site Security	24	NI	Security and availability of records
12	NI	Control of mud and debris	25	NI	Site diary
13	NI	Potentially polluting leaks and spillages			

Comments: A fire broke out due to, most likely, a lithium-ion battery, on the afternoon of the 24/05/26. Having examined the site and viewed the CCTV footage of the fire breaking out it was clear that all procedures were adhered to and the staff, Belfast Harbour Commissioners and NIFRS reacted quickly to limit the damage. There appears to be no structural damage and the management of the issue was very professional. All data we require has been handed over or is about to be.

Actions:
2) Review the fire action plan, fire prevention plan and working plan for the site and were changes or updates are required, provide updated copies to NIEA. Provide copies of the company's fire report, NIFRS report and drainage report – within 2 weeks

Letter Request	Continuation sheet
----------------	--------------------

Officer's Signature	Operator / licence holder signature Name & position
----------------------------	---



Photos



1

Breakdown by Device Type (2024)

- E-bikes: 362 fires (+100% since 2022)
- E-scooters: 156 fires (+32%)
- Electric Vehicles: 232 fires (+77%)
- Mobility Scooters: 30 fires (+20%)
- Other Li-ion Devices: Not individually itemised

2

Annual Trends (UK)

- Total Li-ion Fires:
- 2022: 690
- 2023: 1,038
- 2024: 1,330
- Overall Increase: +93%

3

Severity & Risk Metrics

- At least 3 Li-ion fires per day in the UK (2024)
- Fires burn hotter, faster, and unpredictably
- Require up to 10x more water to extinguish
- Most incidents occur in residential properties

4

Certification & Product Quality

- Many fires linked to uncertified/modified batteries
- Major issues with conversion kits and aftermarket products
- Market flooded with unregulated Li-ion batteries
- Stronger certification expected under Product Regulation & Metrology Bill

5

ROI: Lithium-Ion Battery Fire Data Comparison

- No national Li-ion fire statistics published.
- No device-specific data (e-bikes, e-scooters, EVs).
- Government fire stats do not track Li-ion as a category.
- Aviva survey shows awareness issues but no incident counts.
- Ireland relies on broad EU Battery Regulation, not fire-specific laws.

6

References

British Safety Council (2025)

'“People need to understand the risks”: Insurance firm urges caution amid surge in lithium-ion battery fires', *Safety Management*, 27 May. Available at: <https://www.britsafe.org/> (Accessed: 3 February 2026).

GOV.UK – Office for Product Safety & Standards (2025)

Fires in e-bikes and e-scooters – 2024. Updated 5 June. Available at:

<https://www.gov.uk/government/publications/fires-in-e-bikes-and-e-scooters/fires-in-e-bikes-and-e-scooters-2024> (Accessed: 3 February 2026).

Browne Jacobson (2025)

Flowers, J. 'Rising increase in lithium-ion battery fires: What insurers need to know', 30 June. Available at:

<https://www.brownejacobson.com/> (Accessed: 3 February 2026).

FIA UK (2025)

'Surge in e-bike and e-scooter fires sparks safety concerns', 16 June. Available at: <https://www.fia.uk.com>

(Accessed: 3 February 2026).

Department of Housing, Local Government and Heritage (Ireland) (2024)

Fire Statistics. Available at: <https://www.fireireland.ie/fire-safety/fire-statistics/> (Accessed: 3 February 2026).

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International Fire & Safety Journal (2025)

'UK lithium-ion battery fires rise 93% in two years', 28 May. Available at:

<https://internationalfireandsafetyjournal.com> (Accessed: 3 February 2026). [firestatistics.org]

QBE Europe (2025)

'Fires caused by lithium-ion batteries double in two years', Press Release, 27 May. Available at:

<https://qbееurope.com/news-and-events/press-releases/fires-caused-by-lithium-ion-batteries-double-in-two-years/> (Accessed: 3 February 2026).

Aviva Insurance Ireland (2025)

'Fire risks posed by lithium batteries', Media Centre, 19 June. Available at:

<https://www.aviva.ie/group/media-centre/survey-fire-risks-lithium-batteries/> (Accessed: 3 February 2026).

Chemstore Ireland (2025)

Lithium-Ion Battery Safety: Irish Rules Fall Short, 19 August. Available at:

<https://www.chemstore.ie/knowledge-store/lithium-ion-battery-safety-irish-rules-fall-short-2/> (Accessed: 3 February 2026).

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Fw: EHS International Presents: The 3rd in the Lithium-Ion Battery Safety Series – SOLUTIONS

From: [REDACTED]@clearway-group.co.uk>
Date: Thu 18/12/2025 07:25
To: [REDACTED]@daera-ni.gov.uk>
Cc: [REDACTED]@clearway-group.co.uk>

Morning [REDACTED]

It was good to catch up yesterday

Please find below the info & link on the Lithium-Ion event scheduled for 29.01.26

Can you check your diary and see if your free on the 29th, I was going to reserve a few places your more than welcome to come along with [REDACTED] and myself

Regards

[REDACTED]

Clearway
Metal Recycling

Belfast

Tel: 02890 457556
Mobile: 07515657449

From: [REDACTED]@EHSInt.com>

Sent: 16 December 2025 22:14

Subject: Fw: EHS International Presents: The 3rd in the Lithium-Ion Battery Safety Series – SOLUTIONS

Subject: EHS International Presents: The 3rd in the Lithium-Ion Battery Safety Series – SOLUTIONS

Hi please see our link to the Lithium-Ion Battery event on the 29th January.

Key speakers will be sent out next week.

To book follow the link below. We have had huge interest and bookings already.

Live demonstration and we will also have our VR fire training unit and tge Avenger firefighting robotics that is already in 3 major Fire Brigades in the UK & Ireland.

We also have a great venue in Belfast NIACE 5 Airport Road and free parking and Lunch

Booking link

<https://www.ehsinternational.com/product/ehs-international-presents-the-3rd-in-the-lithium-ion-battery-safety-series-solutions/>

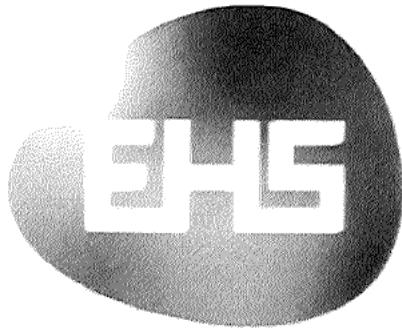
[REDACTED]

Director of Projects

Phone: 07730829207

Email: [REDACTED]@ehsint.com

Web: www.ehsinternational.com



International
Founded by **Chris Mee**



Northern Ireland Fire & Rescue Service

INCIDENT REPORT REQUEST FORM

Please complete the relevant sections of the form below and email it to IRF.Requests@nifrs.org or print the form, complete and post it to the following address:

Protection Administrative Support
NIFRS Headquarters
1 Seymour Street
Lisburn
BT27 4SX

Upon receipt of the form you will be sent further information, which will include details for making the relevant payment, if applicable.

The form is divided into 4 sections. You only need to complete the sections relevant to your request as follows:

Section 1		
Complete section 1 for all requests.		
1.1	Date the incident occurred:	24/05/2026
1.2	Incident address or the location of the incident:	Clearway Disposals Ltd., East Twin Rd., Belfast, BT3 9EN
1.3	If damaged by fire spread, the address at which the fire spread damage occurred:	N/A
1.4	Type of incident: (i.e. fire, road traffic collision, etc)	Fire

Section 2

Complete section 2 if your property has been involved in fire, or damaged by fire, or you have been directly involved in another type of incident.

2.1	Your name:	
2.2	Your address:	SHEQ Manager East Twin Rd., Belfast, BT3 9EN
2.3	Your email address:	@clearway-group.co.uk
2.4	Contact telephone number:	078027642145
Individuals must also provide a copy of two forms of ID that links them to the property, such as a passport, driving licence, bank statement, utility bill, rates bill, vehicle log book, etc. A legible copy, scan, or photograph of the ID is acceptable. The two forms of ID are to be sent with this form.		
2.5	ID type 1 provided:	Passport
2.6	ID type 2 provided:	Driving Licence

Section 3

Complete section 3 if you are a solicitor, insurance company, or loss adjustor who has been instructed by a client to act on their behalf.

3.1	Company name:	
3.2	Company address:	
3.3	Contact name:	
3.4	Contact telephone number:	
3.5	Contact email address:	
3.6	Company reference: (if required for correspondence)	
3.7	Name of the person / organisation you are acting on behalf of.	

IRF Requests Team

Prevention & Protection

T 028 9266 4221

From: [REDACTED]@clearway-group.co.uk>

Sent: 26 May 2026 07:53

To: .NIFRS Information Unit <informationunit@nifrs.org>

Cc: [REDACTED]@clearway-group.co.uk>; [REDACTED]

[REDACTED]@clearway-group.co.uk>

Subject: Urgent Request for NIFRS Incident Report — Clearway Disposals Ltd, East Twin Road, Belfast Harbour

Good morning,

I am writing on behalf of Clearway Disposals Ltd in respect of the fire incident at our East Twin Road facility within Belfast Harbour.

As the operator/occupier of the affected premises, we request a copy of the official NIFRS Incident Report and associated incident reference/log number for the incident.

Given the ongoing engagement with NIEA, HSENI and Belfast Harbour, we would be grateful if the report, or at minimum the incident reference/log number and key operational timeline, could be provided as soon as practicable.

Where available and releasable, we would also request confirmation of:

- date and time of first call;
- arrival time of first appliance;
- incident commander / command structure details;
- appliances and specialist resources deployed, including any High-Volume Pump deployment;
- firefighting water source information;
- major operational decisions relevant to boundary cooling and prevention of escalation;
- time of stop message / handover back to site control;
- any preliminary fire investigation findings or supposed cause information.

This request is made for the purposes of statutory compliance, internal incident investigation, environmental response, insurance notification, and cooperation with the relevant regulatory authorities.

Please advise if you require the completed NIFRS Incident Report Request Form, proof of authority, or any further information from Clearway to process this request.

Aye,

SHEQ Manager
Clearway Disposals Ltd

Clearway
Metal Recycling

Hammond Lane
Metal Company
Part of the Clearway Group

Tel: 02890 457556 Ext 227 | 07802764245 | [REDACTED]@clearway-group.co.uk

The information contained in or attached to this message is intended for the addressee only. If you are not the intended recipient, any use, storage, disclosure or copying of this information is unauthorised and prohibited. This information may be confidential or subject to legal privilege. If you have received this email in error please notify the sender immediately. Any views expressed in this email are those of the individual sender and do not necessarily reflect the opinion of Northern Ireland Fire & Rescue Service, unless that is clearly stated. Nothing in this email amounts to a contractual or legal commitment on the part of NIFRS. The information contained in the email may be subject to public disclosure under the Freedom of Information Act 2000. Reasonable steps have been taken to ensure that outgoing communications do not contain malicious software and/or code. NIFRS cannot accept liability for any adverse impact this message and/or attachments has on the recipient's IT system.

Following receipt of payment, your request will be processed.

Kind regards

IRF Requests Team

Prevention & Protection

T 028 9266 4221

From: [REDACTED]@clearway-group.co.uk>

Sent: 26 May 2026 13:51

To: .NIFRS IRF Requests <IRF.Requests@nifrs.org>

Subject: IRF26262 - Inc No 15961261 / 16273261 - Clearway Disposals Ltd, East Twin Road, Belfast Harbour - Incident Report Request Form

Hi,

Thank you for clarifying those points for me. I have attached the from as required. Thank you again.

Aye,

From: .NIFRS IRF Requests <IRF.Requests@nifrs.org>

Sent: Tuesday, May 26, 2026 12:07

To: [REDACTED]@clearway-group.co.uk>; [REDACTED]

[REDACTED]@clearway-group.co.uk>; [REDACTED]@clearway-group.co.uk>

Cc: .NIFRS Information Unit <informationunit@nifrs.org>

Subject: IRF26262 - Inc No 15961261 / 16273261 - Clearway Disposals Ltd, East Twin Road, Belfast Harbour - Request for Incident Request Form

Good morning [REDACTED]

Thank you for your email below. For your information, Northern Ireland Fire & Rescue Service has introduced an Incident Report Request Procedure. The aim is to streamline the process and advise who is entitled to receive reports and the current fee (where applicable).

This new procedure can be found on our website and the link below will take you to the relevant page. An Incident Report Request Form **MUST** be completed for each request and this form is available on the same page of the website:

[Incident Report Requests - Northern Ireland Fire & Rescue Service \(nifrs.org\)](https://www.nifrs.org/)

Can you please re-submit your request by following this new process?

Kind regards

**IRF26262 - Inc No 15961261 / 16273261 - Clearway Disposals Ltd, East Twin Road, Belfast Harbour
- Valid Response**

From .NIFRS IRF Requests <IRF.Requests@nifrs.org>
Date Tue 26/05/2026 16:27
To [REDACTED]@clearway-group.co.uk>

Dear [REDACTED]

I am pleased to inform you that your Incident Report Request for the following incident has been assessed as valid. Please note the cost for the provision of an Incident Report has increased with effect from 15/08/2025:

Reference Code:	IRF26262
Incident Number:	15961261 / 16273261
Incident Address:	Clearway Disposals Ltd, East Twin Road, Belfast
Incident Date:	24/05/2026

An Incident Report does not include in-depth descriptions of damage to property and any indication regarding the supposed cause of fire is not definitive. It can take up to 60 days from the date of the incident for the report to be completed and it may be redacted before release.

There is charge of **£86.30** which is an administration fee.

Should you wish to proceed with your request, you will need to make a BACS payment as detailed below. In the 'Reference' section enter the unique Reference Code. If you have paid us before please remember to change the 'Reference' before submitting the payment. This is essential so that we can cross reference your request with the payment made.

Bank:	Bank of Ireland UK PLC
Account Currency:	GBP
Account Name:	Northern Ireland Fire and Rescue Service Revenue Account
Account Sort Code:	[REDACTED]
Account Number:	[REDACTED]
Reference Code:	IRF26262

We would prefer you to make the payment by BACS payment. However, if this is not possible, a cheque is also acceptable. Please make the cheque payable to "Northern Ireland Fire & Rescue Service" and on the reverse of the cheque write the Reference Code, and post it to:

Protection Administrative Support
NIFRS Headquarters
1 Seymour Street
Lisburn
BT27 4SX

Unfortunately we are unable to accept payment by cash.

Clearway: Request for Information.

(for internal use only)

RFI#:	202605-02	Submitted on: (DTG)	25MAY/0800/2026
Requested by:			
Reason:	Investigation	Processed on: (DTG)	
Requested from:	SPOC		
RFI Description			
CCTV images relevant to the ignition of the feed material on 24MAY2026 circa 1200 hrs through to NIFRS FPOS arrival and deployment.			
Attachments:			
SD81 Fire Investigation Form			
Submitted by: (name, role, location)		SHEQ Manager	
Response to RFI:			
Accepted / Declined			
Reasoning: (e.g. further information required)			
Responding Signature:		Date: 25.05.26	