

John Rock
Natural Resources Wales
St. Mellons Business Park
Fortran Road
St. Mellons
Cardiff
CF3 0EY

Friday, 11 August 2017

Dear Mr Rock

Informal consultation: Fire Prevention & Mitigation Plan Guidance – Waste Management

CIWM Cymru Wales have received a copy of the above draft guidance for comment as part of your consultation process.

The Chartered Institution of Wastes Management (CIWM) is the professional body which represents over 5,500 waste and resources management professionals, predominantly in the UK but also overseas. The CIWM sets the professional standards for individuals working in the waste and resources management sector and has various grades of membership determined by education, qualification and experience.

CIWM is recognised as the foremost professional body representing the complete spectrum of the waste and resources management sector. This gives the Institution the widest possible view and, perhaps more pertinently, an objective rather than partial view, given that our goal is for improvement in the management of all wastes and resources.

The Cymru Wales Centre of the Chartered Institution of Wastes Management welcomes the opportunity of contributing to the informal consultation on the Fire Prevention & Mitigation Plan Guidance – Waste Management.

CIWM Cymru Wales comments are provided below and on the following pages.

Consultation Response on Natural Resources Wales Fire Prevention & Mitigation Plan Guidance

Having reviewed the Fire Prevention & Mitigation Plan Guidance as prepared by Natural Resources Wales, CIWM Cymru Wales can comment as follows:

Overall, CIWM Cymru Wales believes that the draft guidance is extensive, robust and in the most, provides clarity on a number of concepts, which seem to be lacking in the previous NRW guidance/ the Environment Agency's counterpart. Basing the guidance on increased industry and fire and rescue service experience and improved knowledge provides the operator with a more thorough understanding of the necessity of the production of an FPMP. Notwithstanding this, CIWM Cymru Wales believes that there are a number of areas which require further explanation/thought given the complexity of the subject matter:



- Clarification on whether the guidance applies to batteries once they have been removed from ELVs.
- Clarification on whether the guidance applies to scrap metals if they are not contaminated with other combustible materials/substances.
- CIWM Cymru Wales notes that the guidance does not apply directly to landfill sites, but what is the protocol with regards to the storage of stockpiles of tyres etc upon landfill sites? Would an FPMP be required in this instance?
- As per the narrative on page 6, CIWM Cymru Wales notes that new and existing Standard Rules Permits do not need to submit a FPMP with an application, however the operator must ensure that one is in place prior to the commencement of operations. It may be the case in some instances that if an FPMP is not assessed by NRW prior to commencement of operations (but one does exist) then it may not comply with the minimum recommended standards stipulated within the guidance. How will NRW regulate this?
- In addition to the above, it is noted on page 7, that Bespoke Permits (Existing Application) will not need to provide an FPP unless the operator is looking to add an additional waste code to the permit or to increase the amount of stored wastes at the site. CIWM Cymru Wales believes that this is reasonable if the site already has an approved FPP in place. For those that do not have an FPP which has been discussed and agreed with the NRW, an FPP should be prepared, implemented and considered as part of any initial environmental permit variation application (EPVA), regardless of the proposed changes.
- In relation to the EPVA, page 38 of the document indicates that a review of the FPMP is required when there is development of new infrastructure on site (new buildings) or new equipment is installed at the site. However, if the operator were to submit an EPVA to include a new building or new equipment (treatment), then page 7 does not indicate that the provision of an FPMP is required. These two statements seem to contradict themselves. As an example, if an operator were seeking to vary their Environment Permit to add a new process line which included (for example) shredding (this would be the new 'equipment'), which may present an additional fire risk, CIWM Cymru Wales believes that this would warrant the provision of an FPMP.
- In terms of sensitive receptors (as detailed on page 8), the draft guidance specifies that the contact details of "residential areas" should be included within the FPMP. How do NRW suggest an operator does this? Surely, it wouldn't be deemed sensible or practical to include telephone numbers for every resident within a nearby residential estate. Clarity is required with regards to this matter.
- In terms of environmental receptors (again, listed on page 8), clarification on who NRW require the operator to contact in the event of an emergency is required e.g. contact of NRW in terms of source protection zones/surface water etc? A couple of examples may be appropriate.
- In terms of the layout of buildings – it is advised that the location of utilities is illustrated on a site plan (as detailed on page 9). This seems vague and requires further explanation. What utilities are NRW interested in and what exactly would need to be depicted?
- CIWM Cymru Wales notes that the draft guidance (page 10) expects the inclusion of details regarding weather conditions and fire scenarios – further clarification on the scope of this requirement is needed.
- From discussions with operators, it is apparent that the fitting of rubber strips (as detailed within the second bullet point on page 11) to mobile plant will never be practicable as they often detach from the plant upon contact with another surface.

- Do NRW require evidence to back up their requirements as listed throughout the draft guidance e.g. evidence of electricians being checked by qualified electricians, drafts of proposed exercise plan, evidence of UKAS accredited schemes being utilised for the design, installation and maintenance of fire detection systems etc or will a statement confirming as such suffice?
- The draft guidance specifies that the maximum storage time on site for baled and compacted wastes is 6 months, however further along the same page (page 13), it states that materials that are at risk of self-combustion if stored for more than 3 months includes RDF. What do NRW recommend for bales of RDF? CIWM Cymru Wales suggests that unless this is clarified, it may cause confusion among some operators.
- Further clarification on the control of moisture technique in the prevention of self-combustion. For example, is this only in relation to bales of certain materials, compost etc.
- There are significant space requirements which will be difficult for smaller sites to comply with (firebreaks, separation distances, quarantine areas, fire-truck access). This may lead to the closure or relocation of many smaller site operations, once the guidance is implemented. It is suggested that NRW will need to provide extensive advice and tailored guidance to those sites which will struggle with the amount of space required on site. Could this be provided via a visit to potential sites to offer solutions prior to the submission of an FPMP?
- We understand that only 2 graphs (on pages 21 and 24) have been utilised in order to make the guidance easier for users to understand, however, the fact that the graphs are based on a stack height of 4m, requires reconsideration. Many operators store much smaller stockpiles of materials at their sites (e.g. planning restrictions are regularly used to restrict external storage height to a maximum of 3m for visual impact purposes) and therefore the use of graphs for 4m high stacks is very limiting. Whilst the guidance does note that a fire engineer could calculate bespoke separation distances, CIWM Cymru Wales feels that the guidance itself should provide further options in the first instance e.g. 2 more graphs addressing stack heights of 2 and 3m. It is assumed that there is no simple correlation between a stack's height and its other dimensions i.e. a 2m stack height will not necessarily allow for the doubling of the stack length/width based on the graphs provided. If it is as simple as this, the guidance should make this clear so that operators can determine the appropriate separation distances as appropriate.
- CIWM Cymru Wales notes that fire walls need to be of a suitable construction, as specified on page 29 and throughout the document. CIWM Cymru Wales recommends that NRW provide further clarity on what aspects need to be considered (as a minimum at least).
- Clarity on whether the separation distances apply to small containers of materials (i.e. <1,100litre)
- How flexible is the guidance in terms of being able to justify not implementing the specific techniques specified in the guidance?
- The narrative provided alongside the diagrams on page 30 is repeated for both drawings. CIWM Cymru Wales suggests the utilisation of two drawings against one block of text to avoid confusion.
- If appropriate separation distances are maintained, would NRW still require the operator to implement appropriate fire compartmentation techniques at a site, as detailed on page 31?
- In terms of seasonality and waste stock management (section 15 on page 32), the draft guidance indicates that the operator should provide a technical assessment that shows the proposal will be viable

in foreseeable market conditions. Further information is required to stipulate what NRW expect to see as part of this technical assessment.

- If a site does not have a fire detection system/fire suppression system that has been designed, installed and maintained by a UKAS Accredited certification scheme, but has been designed, installed and maintained by a firm that is not accredited – do NRW expect the operator to reinstall the system to the approved credentials? Would NRW require a copy of any certificates in relation to this? This is discussed on pages 33 and 34 of the document.
- CIWM Cymru Wales welcomes the change of wording with regards to the required water supply (section 20, on page 35) at the site (i.e. it no longer specifically indicates that a water supply to tackle all waste stored at the site will be required), however the re-wording of this section, regarding this seems confusing. Why does it stipulate that there must be enough to manage one (your largest stack) or more stacks on site? Does this therefore mean one stack /two stacks/ten stacks etc? It needs to be more specific.
- Water supply (section 20, page 35) – whilst the 2,000 litres a minute specification could be achievable for sites situated adjacent to natural sources of water or within a suitable distance of a fire hydrant, rural sites may find it more difficult to comply with this element of the guidance without spending large sums of money to improve their infrastructure. It has been our experience that the required supply from fire hydrant cannot even be guaranteed by local water companies. Have NRW consulted with Welsh Water with regards to the provision of this sort of information to waste operators?
- It is suggested that NRW give examples of instances when the re-circulation of fire water (which is discussed on page 36) is/is not appropriate. Surely, all the Fire and rescue services (FRSs) in Wales will have standard requirements for this?
- In relation to the above, the guidance offers examples of suitable water supplies such as rivers, canals, lakes etc then goes on to say they can be considered to supplement tanked or mains supplies. If there are no mains supplies or tanks, surely the river/lake/lagoon can be utilised as the primary source of water and not as a supplementary?
- Have NRW liaised with each of the public sewerage undertakers in Wales to inform them of pending potential changes in guidance which may see waste operators requiring an agreement in principle from them to discharge firewater to foul sewers in an emergency (as discussed on page 37)? Are there standard requirements under any relevant regulations for this?
- Containment of fire water (discussed on page 36)- exactly how much water do NRW expect the operator to contain at a site? Would it be related to the corresponding supply of water e.g. 2,000 litres a minute for 3 hours? This does not take into account the nature and absorptive capacity of the materials, type of fire response system, rainfall, water lost to evaporation during cooling etc. It is difficult to accurately quantify the amount of firewater that the site can contain given the number of variables which can affect the figure. It is also likely that having to prepare for this worst-case scenario of containing large amounts of fire water on site would incur huge financial costs for the operator.
- In terms of the Quarantine Area, as discussed on page 37– why has the 6m separation distance remained acceptable when all other separation distances are now based on waste type and form?
- A template which details relevant headings and potential discussion points, which would accompany this guidance would be hugely beneficial to all those working in the waste management industry. Whilst

the draft guidance provides a large amount of information, a concise document addressing the main points which require consideration and proposed order of contents would be beneficial.

- Formatting of the document – clearer layout and structure to the document is required. Better defined chapters/headings would be of use. It is likely that these chapters/headings would then correspond to any template that would accompany the document. The table on page 9 does not have a number or reference.
- In some instances, CIWM Cymru Wales feels that the guidance could be simplified, with less technical explanations (where appropriate) and use of 'jargon'. There are also instances of repetition which could be removed.

Should you have any query with regards to our response, please do not hesitate to contact us.
Kind regards

Celine Anouilh
CIWM Regional Development Officer for Wales

For CIWM Cymru Wales

