

Our ref: NRW_RD12

Your ref:

Gwefan/Website: www.naturalresourceswales.gov.uk
Gwasanaethau Cwsmeriaid/Customer services:
0300 065 3000

Natural Resources Wales have made a Regulatory Decision regarding the use of end of life vehicles and other controlled wastes for training purposes by the emergency services and armed forces.

We understand that the emergency services and armed forces frequently require the use of end of life vehicles (all vehicle types, not just cars) and other wastes in training exercises. This training is essential to these services and for the protection of the public and may include:

- a) the cutting and/or burning of ELVs
- b) locating and disarming hidden explosives in ELVs
- c) live fire scenarios in buildings due to be demolished
- d) creation of fire investigation scenes
- e) controlled explosions of ELVs.

Wastes are also used in demonstrations to specific groups or the general public for education or awareness raising purposes.

These activities all require an environmental permit. However, as the activities take place under controlled circumstances and, in many cases, on an infrequent basis, we believe that the requirement for a permit would be disproportionate to the risk.

Natural Resources Wales will not pursue the requirement for an Environmental Permit subject to compliance with the requirements below.

- Any waste electrical and electronic equipment or ELVs that are used are obtained from Authorised Treatment Facilities or local authorities.
- ELVs that have not been depolluted are stored and used on impermeable pavement with a sealed drainage system. These vehicles must not be used in any scenario that involves the burning of the vehicle or release of any fluids. This does not include vehicles that only retain shock absorbers, air-bags or batteries where essential for the training, but are otherwise fully depolluted.
- No wastes containing ozone depleting substances or fluorinated gases are used.

- Wastes are returned to an authorised facility once they are finished with.
- ELVs that are not fully depolluted and any other hazardous wastes being moved to and from the place of training are accompanied by a consignment note.
- When more than 10 vehicles are being stored or used at one location, an environmental risk assessment is undertaken and permission is obtained from the local Natural Resources Wales office before the training exercise proceeds.
- You meet the relevant objectives of the Waste Framework Directive;

'... ensuring that waste management is carried out without endangering human health, without harming the environment and in particular:
(i) without risk to water, air, soil, plants or animals;
(ii) without causing a nuisance through noise or odours; and
(iii) without adversely affecting the countryside or places of special interest.'

Enforcement

In not pursuing an application for a permit, we will not normally take enforcement action unless the activity has caused, or is likely to cause, pollution or harm to health. For a more detailed explanation of this enforcement position, please see our Enforcement and Prosecution policy available on our website;

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This statement is based on our understanding of the relevant legislation and applies to activities conducted in Wales.

This regulatory position will be reviewed by June 2016.

If you have any questions in regard to the above please do not hesitate to contact me on the details below.

Yours sincerely



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