Non-Technical Summary

Secure Measures Marine Ltd.

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SITE DETAILS

Secure Measures Marine Ltd

Manor Road,

Erith,

Kent,

DA8 2AD

OPERATOR DETAILS

Secure Measures Marine Ltd

457 Southchurch Road,

Southend-On-Sea,

Essex,

SS1 2PH

PERMIT REFERENCE

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Wiser Environment Ltd, Suite 11 Manor Mews, Bridge Street, St Ives, PE27 5UW
94 Xuan Thuy, Thao Dien Ward, District 2, Ho Chi Minh City, 713385
+44 1480 462 232 | www.wiserenvironment.co.uk | info@wisergroup.co.uk

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1. INTRODUCTION

This document is the Non-Technical Summary (NTS) that accompanies the application for a Bespoke Environmental Permit for Secure Measures Marine Limited, Manor Road, Erith, Kent, DA8 2AD. The site is located at National Grid Reference TQ 52206 77922.

The facility is a boat breaking operation whose operational area consists of two floating 12-tank steel pontoons which are 40m long x 9m wide x 2.4m high and a sealed floating dry dock which is 40m long x 12m wide x 4m high. The dry dock is made up of steel construction with 2 x 12-inch valves. The Pontoons are Connected together with 40m long x 20m wide x 1.9m high rolled steel joist, interlaced steel frame with steel decking.

The structure is surrounded by water and connected to the riverbank by a footbridge.

The operation is tidal, and the main operational area is based on the steel pontoons which sit on the riverbed beside the River Thames. The pontoons act as the platform where the depollution and dismantling equipment, mobile plant (360 excavator and grab), the workshop and all welfare facilities are located.

The operator receives boat carcasses that have been decommissioned and depolluted ready for dismantling, to recover the metals.

Previously, the operator registered a T9 waste exemption for recovering scrap metal (WEX394686), which specified the site as being part of European Metals Recycling's Manor Road Facility (EPR/FB3509MJ). Following a visit by the EA on 1st July 2025, the T9 exemption was deregistered and all activities under the T9 exemptions were stopped.

The EMR facility is immediately to the west of the site and is the sole offload of the scrap metal produced by SMM at the Erith site.

The site's relationship with the EMR facility is limited to and includes only access and egress via the EMR site. The EMR buys all the scrap metal from SMM. SMM is the competent body and therefore there is no potential for a multi operational facility with the EMR.

SMM hold a Port of London Authority Licence (PLA No. 126.1579). This licence regulates the activities that can be undertaken upon the River Thames. The PLA Licence does not allow any scraping, cleaning or painting of vessels or any potentially polluting activity to be carried out unless in dry dock barge, which acts as secondary containment and avoids any potentially polluting substances from being discharged to controlled waters.

The application has been prepared by Wiser Environment Limited on behalf of the applicant Secure Measures Marine Ltd.

This NTS summarises the proposed activities to be regulated under the Environmental Permit and should be read in conjunction with the other supporting documents included within the application.

2. APPLICATION

This application is for a Bespoke Environmental Permit and has been prepared under the Environmental Permitting (England and Wales) Regulations 2016 (as amended) for a Waste Operation.

The scope of this application is limited to waste operations only. This covers waste treatment involving metal recycling – boat breaking, metals recovery, temporary storage and transfer of hazardous waste for acceptance of End-of-life marine vessels.

The permit boundary is shown in green in Figure 1 and infrastructure and equipment on site includes:

- Excavator with various attachments: shear, selecta grab, 5 tines grab and bucket.
- Mini digger with attachments, hammer, buckets
- Oxy propane cutting equipment
- Compressed air and gas etc.
- Petrol driven disc cutter.
- Petrol driven chainsaw
- Various hand tools.
- Footbridge
- Dry dock
- Steel pontoons
- Site office
- Welfare facilities

2.1. Site Location

The site is located on the River Thames, at Anchor Bay Wharf, adjacent to the town of Erith. The closest road is Manor Road which is located to the south of the site. It is bounded to the north by Anchor Bay, River Thames. Commercial and industrial premises are located to the East and West of the site. The nearest commercial area is 19 m SE & SW of the permit boundary while the nearest industrial feature is approximately 33 m W of the permit boundary shown on the Permit Boundary Plan (K508.1~20~005) and Site Setting Plan (K508.1~20~002).



Figure 1 Aerial image of the site, showing the permit boundary in green

2.2. Environmental Setting

The environmental setting of the site is summarised in Table 1. A more detailed description of the site setting can be found in the Environmental Risk Assessment (ERA) (K508.1~09~003) within Section 10 of the application pack:

Table 1 Summary of Site Setting

RECEPTOR	DESCRIPTION AND LOCATION
Humans and Property	• Site workers and site visitors (on site)
Surface Water	• Thames Middle (On site)
Groundwater	• Principal, Bedrock Aquifer (On site) • Secondary Undifferentiated superficial aquifer (On site) • Unproductive, superficial aquifer (On site) • West Kent Darent and Cray Chalk (On site) • Thames Groundwater (272m E) • Thames Groundwater (1370m W) • Thames Groundwater (1445m W)
Designated Sites	• Green Belt (411m E, 571m E, 1,573m E, 1,634m NE, 1,780m E)

RECEPTOR	DESCRIPTION AND LOCATION
	• Inner Thames Marshes (1,531m NE) • Southall Sewer and Running water Brook NZ (1,331m NE)
Non-Statutory Designated Sites	• Network enhanced Zone 2 (On site) • Associated habitats (On site) • Mudflats (213m E)
Geology	• Artificial deposits of rocks - (Made ground (undivided) on site) (LEX Code (MGR-ARTDP) • Site surroundings are made of worked, infilled, disturbed and landscaped ground. • Superficial and Drift Geology (500m) - Tidal River or Creek Deposits - Silt (LEX code TRD-Z) and Alluvium - Silt (unlithified Deposits Coding Scheme) (LEX code ALV-Z) • Bedrock and Solid Geology - Seaford Chalk Formation – Chalk (LEX code (SECK-CHLK)) of the Santonian - Coniacian age.
Flooding	• The site is situated on the River Thames which is tidal and in an area with a high (0 - 50 m) risk of flooding from river and Sea (RoFRaS). The site is situated in Flood Zone 2 (Fluvial Models) and the likelihood of flooding from rivers, or the sea is 0.1% each year.

3. PERMITTED OPERATIONS

The sole purpose of the site is dismantling of end-of-life vessels (boats).

The operator receives boat carcasses (vessels) that have been decommissioned and need dismantling for recovery of the metals.

The boat breaking process takes place fully within the floating dry dock which sits on the River Thames.

The depollution and dismantling equipment, mobile plant (360 excavator and grab), workshop and welfare facilities all sit on the steel pontoon. The structure is surrounded by water and connected to the riverbank by a footbridge.

SMM does not process more than 25,000 tonnes of waste a year.

The amount of hazardous waste stored on site at any one time shall not exceed 50 tonnes. The hazardous and non-hazardous waste throughput and daily treatment amounts from the site varies based on the vessels being broken down.

3.1. Floating Dry Dock

A floating dry dock is a type of dry dock. These systems consist of a vessel that can be used to float a load (in this case another vessel) so that the load can be drained and rested on a dry platform, where it can be worked on.

The walls of dry docks can be filled or emptied of water by operating a valve: vessels can be manoeuvred into the dry dock while it's filled with water (i.e. sunk), the dock is then drained so the vessels rests on a dry platform.

The removal of any residual liquids from the vessels and the cutting of metal are all carried out within the floating dry dock. The dry dock will be visually inspected for any traces of residual oils, fuels or bilge. Absorbents and spill kits are located within the dry dock to soak up and clean any residual pollutants before water is pumped out of the dry dock into the river.

3.2. Steel Pontoon

The steel pontoon is only used as an area for equipment and temporary placement of the cut steel panels prior to transfer to the neighbouring permitted EMR facility. Scrap metal is unloaded from the pontoon as it is produced and sheared metals are generally transferred to the EMR facility within 24 hours of processing. Scrap metal cuttings are generally transported directly from the dry dock to the EMR facility using a 360° grab. Skips are positioned on the pontoon to contain any scrap metal cuttings that might be dropped on the pontoon to minimise the risk of diffuse pollution entering the river.

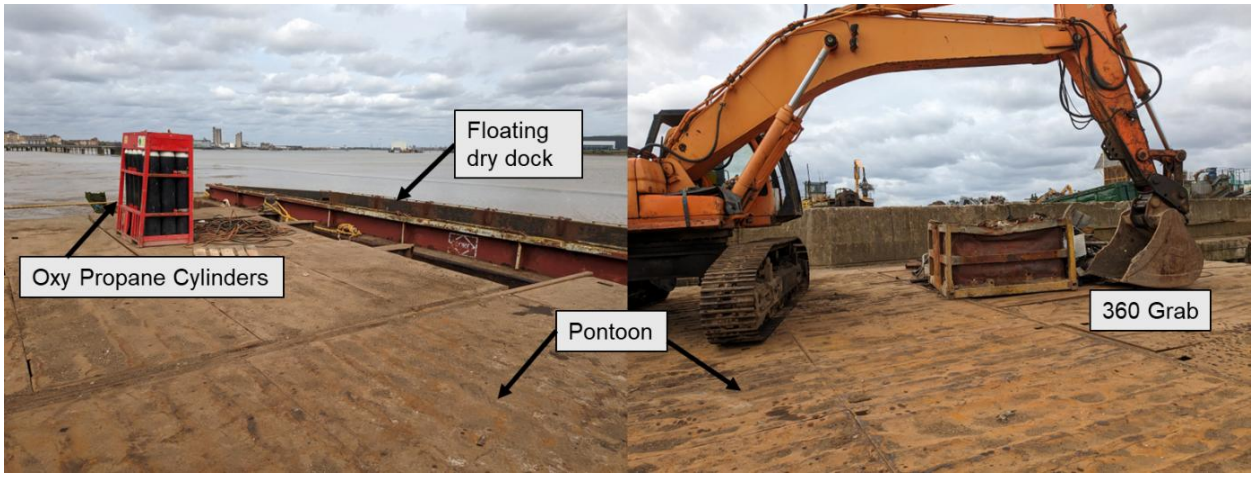


Figure 2: Pictures of the floating dry dock, the pontoon and 360 grab

Activities on site include the recovery of scrap metal (this was previously run under the T9 waste exemption WEX394686), which specified the site as being part of European Metals Recycling's Manor Road Facility (EPR/FB3509MJ).

SMM hold a Port of London Authority Licence (PLA No. 126.1579). This licence regulates the activities that can be undertaken. The licence requires the operator to:

- Collect all waste, contain and dispose of at appropriately licence facilities, keeping records of the facilities and contractors used (refer to Paragraph 21.2);
- Dispose of sewage from the vessels moored and the black water holding tanks in the pontoon barges to facilities onshore (refer to Paragraph 21.2);
- Store all oils, chemicals and other industrial liquids in suitably bunded designated storage tanks and appropriate storage containers (refer to Paragraph 21.4);
- Regularly sample the sediment to check for contamination (refer to Paragraph 21.5); and
- Provide an Environmental Plan that details waste management and pollution control measures (refer to Paragraphs 23.1, 23.2, 23.3).

3.3. Waste Acceptance

The Management System Summary (MSS) (K508.1~09~013) is included in Section 5 of the application pack and describes the Waste Acceptance Procedure for the site.

The materials accepted on site are classified as End-of-life vehicles (LoW code 16 01 04*) and End-of-life vehicles, containing neither liquids nor other hazardous components (LoW code 16 01 06).

A pre-tow survey is completed by SMM and the client before any vessel is received on site to check the status of the vessel and determine if it can be repaired and be resold in the market.

The vessels accepted at the site are predominantly barges and houseboats, which account for approximately 80-90% of all vessels received. The remaining vessels include occasional tugs, floating piers, link spans, and hulks. The vessels accepted onsite are not flagged, although some may arrive coded which is different from being flagged. The types and characteristics of vessels received vary; however, barges and houseboats constitute the vast majority of incoming vessels.

The vessels handled at the site typically range in weight from approximately 10 tonnes to 450 tonnes.

Accepted vessels are docked securely on site using advanced mooring systems guided by trained personnel, using specialised lifting equipment to guide vessels on arrival, while advanced mooring systems tailored to each vessel ensures secure docking. SMM does not process more than 25,000 tonnes of waste per year.

There are no emission points from the operation.

3.4. Waste Processing

The site is operational during the daytime between 7am - 4pm (Monday – Friday) and 7am - 12pm (Saturday).

The vessels will be depolluted (oil and fuel removed) prior to being towed to the operator's site. At the operator's site, further checks are carried out to establish the status of the vessels.

Any vessel that is towed must have a Maritime and Coastguard Agency (MCA) load line exemption[1] or a PLA pre-tow survey to check the status of the vessel and determine if the vessel can be repaired and re-saleable in the market. The pre-tow survey will be carried out by SMM's clients and will determine the contractual terms of sale. Part of pre- tow criteria is that no vessel can be towed with anything in the bilges e.g. fuel or oils. All vessels must be decontaminated prior to towing to the operator's site. Any residual contaminants found are pumped into waste oil tanks. If waste in the form of wood or foam etc are received, this is disposed of by way of outside contractors.

At the operator's site, further checks are carried out to establish the status of the vessel. Based on the operator's assessment and the outcome of the pre-tow survey, vessels may be resalable or dismantled with the intention of discarding them. Until such decision is made, there will be no treatment of the vessel.

Waste vessel carcasses are at this point loaded onto containers which sit on the riverbed at low tide and floats on the water at high tide.

During high tide, the water in the container will be drained and work begins on the vessels.

The main stages of the process are:

- **Draining of residual fluids (if needed):** although depolluted prior to delivery, residual fluids such as fuel and oil are drained and transferred to the site's double bunded fuel and oil tanks.
- **Oxy-fuel cutting of main vessel structure:** Carcasses of the vessels are cut into metal "chunks" using oxy propane equipment. The scrap metal pieces vary in size and may go up to approximately 3m in length and width. The scrap metal is temporarily stored on the main processing area.
- **Scrap metal transfer:** the scrap metal is transferred directly to the adjacent EMR site using a 360° grab. Skips are positioned on the pontoon to contain any scrap metal

[1] Exemptions are issued for specific, limited operations, such as one-off trips.(19th January 2026)

cuttings that might be dropped on the pontoon to minimise the risk of diffuse pollution entering the river. The proximity of the two sites allows the excavator to reach across the boundary and grab the metal to deposit it into their permitted site.

The process has the following key characteristics:

- It is weather dependent for health and safety reasons; the process cannot be carried out in adverse conditions such as high winds or ice.
- It is a tidal process, which relies on the high tide to have the site features and vessels floating.
- The process is only carried out in daylight hours.
- Dismantling of one vessel typically takes between 3 to 6 weeks, subject to the conditions mentioned above.

3.5. Site Management

The operator, Secure Measure Marine Limited shall manage and operate the activities:

a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator because of complaints.
b) using sufficient competent persons and resources, and
c) with records demonstrating compliance.

Any person having duties that are or may be affected by the matters set out in the Environmental Permit EPR/ZP3521SN shall have access to a copy of it.

The operator shall comply with the requirements of an approved competence scheme.

4. RISK ASSESSMENT & MANAGEMENT

An Environmental Risk Assessment (ERA) (K508.1~09~003) is included in Section 10 of the application pack. The ERA details the key management measures for the protection of the environment, with regards to emissions to surface water, groundwater, land, and air (including noise and odour).

The site is operated by Peter Frasle of Secure Measures Marine Limited. A Management System Summary (MSS) (K508.1~09~013) has been developed and is included in Section 05 of the application pack to reflect and control site operations, environmental management, emissions and monitoring. The MSS defines operational and maintenance procedures and details requirements in the event of an accident or incident.

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Suite 11 Manor Mews, Bridge Street, St Ives, PE27 5UW
01480 462 232 | www.wiserenvironment.co.uk | info@wisergroup.co.uk