# Management System Summary

## Secure Measures Marine Limited

wiser environment

*Helping clients prosper through compliance*

## 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

EPR/ZP3521SN

## DOCUMENT REFERENCE

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## DRAWINGS

| REFERENCE | TITLE | DATE |
|---|---|---|
| K508.1~20~005 | Permit Boundary Plan Rev B | 20/12/2024 |
| K508.1~20~002 | Site Setting Plan Rev B | 20/12/2024 |
| K508.1~20~007 | Site Layout Plan Rev 6 | 20/02/2026 |

## APPENDICES


| APPENDIX | TITLE |
|---|---|
| Appendix A | Pre-tow survey information: |
| Appendix B | General Method Statement: Health and Safety at Work July 2022 |
| Appendix C | Complaint Form |

# 1 INTRODUCTION

This document is the Management System Summary (MSS) that accompanies the application for a Bespoke Environmental Permit for the waste operation at Secure Measures Marine Limited (SMM), Manor Road, Erith, DA8 2AD.

This application has been prepared by Wiser Environment Limited (Wiser) on behalf of the applicant, Secure Measures Marine Limited.

The facility is a boat breaking operation whose operational area consists of a 40m long x 9m wide x 2.4m high floating steel pontoon and 40 m x 12 m floating dry dock. The operation is tidal, and the main operational areas are the floating dry dock and the steel pontoon which sit on the River Thames.

The floating dry dock is a fully sealed system where the boat breaking takes place. The steel pontoon acts as a platform that hosts depollution and dismantling equipment, mobile plant (360 excavator and grab), workshop and welfare facilities. The structure is surrounded by water and connected to the riverbank by a footbridge.

The operator receives boats that have been decommissioned and depolluted ready for dismantling, to recover the metals contained therein. The vessels accepted at the site are predominantly barges and houseboats, which account for approximately 80-90% of all vessels received. 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. SMM's relationship with the EMR facility is limited to and includes only access and egress via the EMR site. The EMR facility buys all the scrap metal from SMM. SMM is the competent body and there is no potential for a multi operational facility with the EMR site.

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 the dry dock barge, which acts as pollution containment and avoids any potentially polluting substances from being discharged to controlled waters.

The dry dock will be visually inspected for any traces of residual oils, fuels or bilge and be cleaned between vessels and any residual water or rain or dirty water left in the dry dock barge is pumped into the IBCs which are emptied by a contractor into a permitted facility. The IBCs

are watertight and within bunded containment area formed from a tank that has been cut in half. All storage vessels are kept in a bunded area and visually checked weekly for any leaks.

The Port of London Authority Licence requires the operator to:

- Collect, contain and dispose of all waste at appropriately licenced facilities, records of the facilities and contractors used must be kept.
- Dispose of sewage from the vessels moored and the black water holding tanks in the pontoon barges to facilities onshore.
- Store all oils, chemicals and other industrial liquids in suitably bunded designated storage tanks and appropriate storage containers.
- Regularly sample the sediment to check for contamination

The EMR facility is immediately to the west of the site and is the sole offload of the 3m scrap metal panels produced by SMM at the Erith site. The offload of metals is virtually immediate, with the metal panels taken by the 360 grab and unloaded within a maximum of 24 hours.

The site is located at National Grid Reference TQ 52206 77922 and shown on the Permit Boundary Plan (K508.1~20~005).

### 1.1 Site Setting

The site is situated on the River Thames, at Anchor Bay Wharf, adjacent to the town of Erith. The closest main road to the site 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 estates 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 Site Setting Plan (K508.1~20~002).

# 2 SCOPE OF MANAGEMENT SYSTEM

The sole purpose of the site is dismantling of boats (also referred to as vessels). Only boats will be accepted on site.

The scope of this MSS extends to all operations associated with the acceptance, handling, treatment and storage of waste at the SMM site and details the principles, infrastructure, operational activities and environmental controls for the site.

The wastes permitted to be accepted at the facility are detailed within the List of Waste (K508.1~09~014).

## 2.1 Site Activities

The site is operated in accordance with management procedures and controls outlined within this MSS which has been produced in accordance with the Environment Agency (EA) guidance, '*Develop a Management System: environmental permits*'[1].

The benefits of operating an effective and efficient Management System are to ensure sustainable business practices, reduce risks and losses, reduce operational costs, help obtain business and a good reputation, and to ensure legal compliance.

A controlled copy of the MSS will be available at Secure Measures Marine Limited, Manor Road, Erith, Kent, DA8 2AD (the site).

SMM will ensure that copies of all relevant permits and approved supporting documents are provided to all personnel with nominated responsibility for the management or control of the site. The locations of the documents will be made known to all relevant personnel and will always be readily available for inspection by regulatory bodies when the site is operational.

The key contact regarding the operation of the site's Environmental Permit is in Table 1 below.

**Table 1**: Technically Competent Manager

| **Technically Competent Manager** | | |
|---|---|---|
| **Name:**<br>Stephen Griffiths | **Telephone:**<br>07557 997360 | **e-mail:**<br>Stephen.griffiths@enviroawardsltd.co.uk |

[1] Develop a management system: environmental permits - GOV.UK (www.gov.uk), updated 3 April 2023

# 3 WASTE TYPE

The permitted waste type onsite is listed in Table 2 below and the List of Wastes document (K508.1~09~014).

**Table 2:** Permitted Waste Types

| EWC CODE | WASTE DESCRIPTION | WASTE STATUS |
|---|---|---|
| **16** | **Wastes not otherwise specified in the list** | |
| **16 01** | **End-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of End-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)** | |
| 16-01-04* | End-of-life vehicles | Hazardous |
| 16-01-06 | End-of-life vehicles, containing neither liquids nor other hazardous components | Non - Hazardous |

# 4 SITE INFRASTRUCTURE

The site is 0.45 ha with site infrastructure comprising of the following:

- Pedestrian entrance over a footbridge from EMR Facility to the south. There is no vehicle access to the site;
- Waste acceptance and operational area (40m long x 9m wide x 2.4m high steel pontoon and 40 m x 12m dry dock);
- Oil storage tank and water bowser
- Spill kits, fire extinguishers and first aid kits; and,
- Office and welfare facilities.

The layout of the site is shown on K508.1~20~007 Site Layout Plan.

## 4.1 Construction Procedures & Supervision

Any construction work, infrastructure improvement and/or replacement will be undertaken by a specialist contractor. A suitably qualified Civil and/or Structural Engineer will inspect works to ensure that all necessary standards and specifications are met.

## 4.2 Maintenance and Inspection

Daily inspections of site infrastructure will be undertaken by the Technically Competent Manager (TCM), or a person appointed by the TCM. All defects will be reported and logged in the Site Diary and/or recorded electronically.

Daily site checks are undertaken to ensure that all structures are in good repair and recorded in the site diary or similar document. Any oils from vessel depollution or for use on site will be stored in appropriate containers or removed by the service engineer. The oil storage container is provided with secondary containment, to prevent the leakage from the container of any materials that might leak from any of the containers stored within it.

All containers stored within the site will be clearly marked with their contents and capacity. Container openings will be securely sealed before being moved around site to prevent spillages. Spill kits are strategically placed within the site. Spill kits shall be available during the transfer of all substances at the site.

# 5 PERMITTED ACTIVITIES

The sole purpose of the site is dismantling of end-of-life vessels (boats). 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 handled at the site typically range in weight from approximately 10 tonnes to 450 tonnes.

Permitted activities are restricted to the acceptance of de-polluted and decommissioned boat carcasses, for dismantling and metal recovery. No other type of EoL vehicle is accepted at the facility. Vessels accepted on site are not flagged, although some may arrive coded which is entirely different from being flagged. The types and characteristics of vessels received vary; however, barges and houseboats constitute the vast majority of incoming vessels.

SMM holds a Port of London Authority (PLA) Licence (PLA No. 126.1579), and this licence regulates the activities that can be undertaken. The PLA Licence does not allow any scraping, cleaning or painting of vessels or any potentially polluting activity to be carried out unless on the dry dock barge, which acts as pollution containment and avoids any potentially polluting substances from being emitted to water.

A pre-tow survey (Appendix A) is completed by SMM and the client before any vessel is received on site to check the status of the boats and to determine if they can be repaired and if they are re-saleable in the market.

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

The depollution and dismantling equipment, mobile plant (360 excavator and grab), workshop and welfare facilities all sit on the 40 m x 9m steel pontoon. The structure is surrounded by water and connected to the riverbank by a footbridge.

### 5.1.1 Floating Dry Dock

The floating dry dock consists 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 boat rests on a dry platform. The vessels arrive on site already depolluted (oil and fuel removed) prior to being towed to the site. Any vessel that is towed must have an MCA load

line exemption or a PLA pre-tow survey. Part of that criteria is that no vessel can be towed with anything in the bilges e.g. fuel or oils. Vessels must be decontaminated prior to towing.

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. Any residual contaminants found in the vessels are pumped into waste oil tanks. The removal of any residual liquids or oils from the vessels and the cutting of metal are all carried out within the floating dry dock.

After cutting is completed, the dry dock is cleaned between each vessel; spill kits are used to clean up any residual oils that may have spilled. Residual liquids and any dirty water within the dry dock is pumped into and collected in the 6 x 1000 litre IBCs on the pontoon. The IBCs are stored within a bunded containment area formed from a tank that has been cut in half. This arrangement ensures that any spills or contaminants are contained, preventing pollution of surface water and the river. The dirty water in the IBC is then taken off site by appropriate contractors and disposed of at a licenced facility. The IBCs are watertight and all storage vessels are kept in a bunded area and visually checked weekly for any leaks.

### 5.1.2 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 cuttings are generally transported directly from the dry dock, over the wall, 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. Sheared metals are generally transferred to the EMR facility within 24 hours of processing.

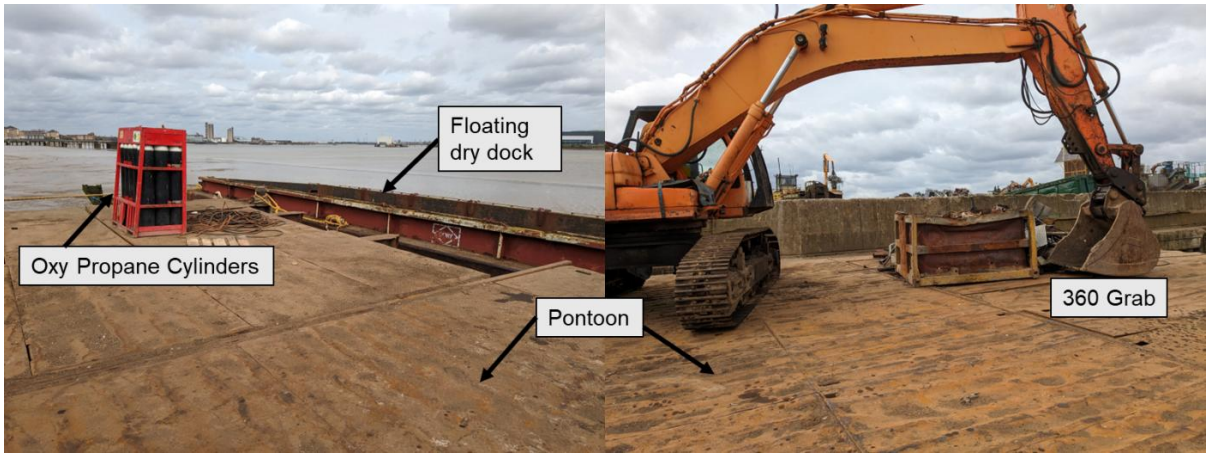



*Figure 1: Pictures of the floating dry dock, pontoon and 360 grab*

The vessels will be depolluted (oil and fuel removed) prior to being towed to the site and are received on site already depolluted. At the site, further checks are carried out to establish the status of the boats. The boats remain non-waste until a decision has been made to dismantle. At this point boat carcasses are loaded onto the floating dry dock.

The wastes that are accepted at the facility are listed in Table 2, Section 3 above. The operator is only authorised to carry out the permitted activities as listed in Table 3 below.

**Table 3:** Permitted Activities

| **Permitted activity code** | **Description of activities** | **Limits of specified activity and waste types** |
|---|---|---|
| **R4** | Recycling/reclamation of metals and metals compounds. | Treatment consisting only of depollution of boat carcasses and sorting, separation, grading, shearing, compacting, crushing or cutting of waste into different components for recovery.<br><br>The amount of hazardous waste stored on site at any one time shall not exceed 50 tonnes. No waste shall be blended or mixed on site.<br><br>Wastes shall be stored for no longer than 24 hours prior to disposal or transfer to the EMR Facility. |
| **R5** | Recycling/reclamation of other inorganic materials. | |
| **R13** | Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced). | |
| **D15** | Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced). | |

# 6 ANNUAL WASTE QUANTITIES

The maximum storage time for waste on site is 24 hours. The waste is transferred to the neighbouring EMR Facility to the south of the site using a 360 grab for recycling.

The site is permitted to receive a maximum capacity of 25,000 tonnes of waste per annum. The site will not store more than 50 tonnes of hazardous waste at any one time.

# 7 RECEPTION, HANDLING & STORAGE OF WASTE

The following section describes the operating techniques that are implemented on site to control the release of any potentially polluting substances to the environment during reception, handling and storage of the waste.

All operations and working practices are regularly reviewed and improved where necessary. There are robust mechanisms in place for investigation of incidents/accidents if they occur.

## 7.1 Pre-Acceptance Procedure

SMM accepts hazardous waste at Manor Road, Erith, DA8 2AD consisting of end-of-life vessels. The type of wastes to be accepted at the site are detailed in the List of Wastes (K508.1~09~014), accompanying the application.

A pre-acceptance procedure is followed in accordance with SGN S5.06[2] section 2.1.1.

Boats are only received and processed at high tide. A pre-tow survey (Appendix A) is completed by SMM and the client before any boat is received on site to check the status and determine if the vessel can be repaired and re-saleable in the market. If this is not possible, the vessel will be accepted at the site. The vessels remain non-waste until a decision has been made to dismantle them (i.e. intention is to dispose).

## 7.2 Reception

On arrival, accepted boats are docked securely on site using advanced mooring systems guided by trained personnel. The accepted boat carcasses remain onsite up to 24 hours.

All deliveries will be pre-booked, no ad-hoc deliveries will be accepted. All boat carcasses are inspected for non-permitted wastes, quality, and conformance with Environmental Permit requirements. Non-conforming loads are refused entry and details are recorded.

All personnel must be wearing appropriate Personal Protective Equipment (PPE) (e.g. hard hats, safety boots and safety glasses) before beginning the unloading process. Additional PPE is required for onsite operations (see Section 7.3 below).

The site is operated in accordance with written procedures incorporated within the Secure Measures Marine Limited Management System.

[2] Sector Guidance Note S5.06: recovery and disposal of hazardous and non-hazardous waste - GOV.UK (www.gov.uk), updated 10 October 2018

All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

### 7.3 Process Controls

The correct PPE provided by SMM must always be worn. Any wear and tear must be reported so that it might be replaced. Safety gloves are required during all activities and ear protection must be worn in noisy places or surroundings.

When oxy propane cutting, operatives must wear the following PPE:

- Hard hat with visor;
- Mask with filter;
- Ear protection;
- Fire retardant overalls; and
- Burn proof gauntlets.

Hot work (e.g. cutting of metal) will not be undertaken without a permit and fire precautions are always required.

Only trained operators may operate machinery, hot works and oxy propane cutting equipment in accordance with operational procedures.

Operators are to engage positively with these rules and if unsure contact the Line Manager.

### 7.4 Handling & Storage

The site is equipped with mobile plant (360 grab), a 40m long x 9m wide x 2.4m high steel pontoon and 40 m x 12m dry dock, depollution and dismantling equipment and welfare facilities. All equipment is periodically inspected in accordance with manufacturers' guidance and manuals to ensure the plant and equipment is available for work when required.

Material processing is only undertaken during daylight hours on Monday to Friday between 07.00 – 16.00 and Saturday between 07:00 – 12:00.

Any potentially polluting activities must be undertaken on the dry dock barge (see operational area on Site Layout Plan; K508.1~20~007), which acts as pollution containment and avoids any potentially polluting substances from being emitted to water. A 150 m containment boom will be installed around the perimeter of the site permit boundary to contain any potential contaminants arising from SMM's operations and prevent them from leaving the permitted area. While the operator cannot prevent third-party vessels from navigating or mooring within this section of the River Thames, the perimeter boom will also provide a degree of protection

against contaminants originating from other vessels in the vicinity, helping to minimise the risk of pollution entering the waters within the permitted boundary.

The main operational area is based on the steel pontoon which sits on the riverbed on the River Thames riverbank.

Any non-conforming waste types, other than those listed in the List of Wastes (K508.1~09~014), will be rejected upon visual identification before the boat carcass is accepted. A record is kept of all waste received at, or rejected from, the site. These records contain:

- Date of arrival;
- Producers' details;
- Previous holders;
- A unique reference number;

All records are maintained for a minimum of 3 years following recovery or disposal.

### 7.5 Waste Dispatch

Any waste leaving the site will be accompanied by a written description, and due diligence checks will ensure that they are transferred to a suitably permitted waste management facility, by a registered waste carrier.

The metal waste will be lifted from the site by a 360 grab onto the adjacent EMR Facility. 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. Sheared metals are generally transferred to the EMR facility within 24 hours of processing.

# 8 SITE & EQUIPMENT MAINTENANCE

The site is equipped with;

- 360 grab
- 40m long x 9m wide x 2.4m high steel pontoon,
- 40 m x 12m dry dock
- Oxy propane cutting equipment
- Depollution and dismantling equipment
- Equipment required for iron works and scrap cutting such as petrol driven disc cutter, petrol driven chainsaw, various hand tools.
- Excavator with various attachments: shear, selecta grab, 5 tine grab and bucket.
- Mini digger with attachments, hammer, bucket etc.

Facilities and equipment used on site are shown in the Site Layout Plan (K508.1~20~007).

All equipment is periodically inspected in accordance with manufacturer's guidance and manuals to ensure the plant and equipment is available for work when required. The gas for the oxy propane cutting equipment will be checked daily for leaks.

The Site Manager also maintains a register of all calibrations of measuring and monitoring devices. All calibrations are undertaken by an approved subcontractor.

## 8.1 Site Operational Procedures

The site is operated in accordance with several written procedures incorporated within the SMM Company Management System and *General Method Statement: Health and Safety at Work* (Appendix B).

All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

## 8.2 Training

It is the responsibility of Senior Management and the Site Manager and TCM to ensure that no unauthorised persons operate equipment on site.

Operation of the equipment is carried out exclusively by staff that are fully trained in safe working practices and the safety features of the equipment.

Individual operators have access to the operation and maintenance manuals of the equipment they use.

### 8.3 Site Security

There is no site access outside of operational times (Monday to Friday 07:00 – 16:00, Saturday 07:00 – 12:00).

The southern half of the site borders the EMR Facility which is surrounded by metal fencing with onsite CCTV. The northern half of the site borders the River Thames, so there is no pedestrian or vehicle access to the site from this direction.

# 9 ACCIDENT PREVENTION & MANAGEMENT

Secure Measures Marine's Environmental Risk Assessment (K508.1~09~003), identifies the foreseeable risks on site and provides details on how risks will be controlled.

Potential accidents and incidents have also been identified within Table ERA13 of the Environmental Risk Assessment (ERA) (K508.1~09~003), where management procedures and controls are identified to reduce any identified risk.

Control measures detailed within the ERA include:

- All vessels delivered to site will be inspected prior to acceptance for processing;
- Deliveries and site operations shall be overseen by the TCM or nominated competent person;
- Unloading will only be undertaken in designated areas (dry docking and pontoon);
- Treatment activities will be undertaken on an impermeable surface (dry dock barge/operational area);
- Appropriate training regarding process/plant operation and emergency procedures is provided to all relevant staff;
- Plant and equipment will be maintained in accordance with their maintenance schedules or when applicable;
- Storage tanks are checked as part of daily site inspections for integrity or signs of leakage; and,
- Fuelling of plant is to be undertaken on an impermeable surface with a suitable spill kit and fire extinguisher available.

Accident prevention and management will be reviewed on an annual basis along with the Management System or following an accident.

**Table 4**: Emergency Contact

| **Technically Competent Manager** | | |
|---|---|---|
| **Name:**<br>Stephen Griffiths | **Mobile:**<br>07557 997360 | **e-mail:**<br>stephen.griffiths@enviroawardsltd.co.uk |

# 10 WASTE MANAGEMENT

The site produces scrap metal waste which is lifted to the adjacent EMR Facility by a 360 grab for recycling. The scrap metal cuttings are stored onsite for less than 24 hours before being moved to the EMR Facility.

# 11 TRAINING & COMPETENCE

The site shall be overseen and managed by a TCM holding the relevant Operator Competence Certificate qualification. The Site Manager/TCM will be responsible for the day-to-day operations at the site, and to ensure that site personnel operate the site in compliance with the Environmental Permit. They will be responsible for ensuring adequate training of staff has been undertaken.

The TCM will report any problem, or potential problem, to Senior Management as well as the Environment Agency.

The TCM will attend site in accordance with the attendance criteria specified within the Environment Agency guidance, *'Legal operator and competence requirements: environmental permits*[3].

All new site staff are taken through an induction process, covering all areas of site operations, including company policies, operational and emergency procedures, risk assessments, site rules, and all relevant conditions of the Environmental Permit. All operative training records will be held by SMM.

It is the responsibility of Senior Management and the Site Manager/TCM to ensure that no unauthorised persons operate plant and equipment on site. Operation of equipment is carried out exclusively by operators fully trained in safe working practices and safety features of the equipment.

Individual operators have access to operation and maintenance manuals of the equipment they use.

Staff training is reviewed regularly through refresher courses, to ensure continued competence in their daily tasks. Copies of appropriate training certificates must be held by SMM operatives and presented to the appropriate personnel onsite when required.

[3] Legal operator and competence requirements: environmental permits - GOV.UK updated 30 April 2025

# 12 COMPLAINTS

All complaints received concerning the permitted site will be dealt with in accordance with the existing complaints procedure in the Management System.

The TCM is responsible for responding to complaints and implementing the complaints procedure. All complaints will be investigated within 24 hours upon receipt.

Upon receipt of a complaint, either directly from a neighbouring resident or indirectly via the Regulator, the following information will be requested from the complainant:

- Name;
- Address;
- Contact details;
- Date(s) and time(s) to which the complaint relates; and
- Nature of the complaint and any other details which may assist in the identification of the source, activity or circumstances which prompted the complaint.

The timings and description of the complaint will be analysed in conjunction with the activities and meteorological conditions logged on site without delay to identify the source. The complainant may be asked to keep ongoing log for correlation with the site operational log. Once the source or activity is identified suitable mitigation measures will be implemented without delay to prevent odour emissions.

## 12.1 Complaints Reporting

The details of the complaint and any subsequent investigation will be recorded in Secure Measures Marine's Complaint Form (Appendix C), or other format recording relevant information. All complaints will be acknowledged and investigated by the TCM, or nominated person, with resultant actions reported to the complainant and the EA.

Records relating to management review, complaints, internal audits and inspections are held for a minimum of six years.

## 12.2 Community Engagement

On receipt of a complaint, the TCM, or nominated person, will investigate the complaint to swiftly rectify the source.

Where contact details are made available, the complainant will be contacted within 24 hours to check that the mitigation measures rectify the issue.

Where additional time is required to undertake repair or replacement of infrastructure which has caused the complaint, the complainant will be contacted with details on the actions being taken and the estimated timescale for completion.

# 13 DOCUMENTS & RECORDS

As a minimum, the following records must be kept ensuring compliance with the requirements of the Environmental Permit:

- A copy of the site permit;
- Site management plans;
- Operational procedures;
- Site and activity risk assessments;
- Competence and training records;
- Compliance records; and
- Duty of Care documentation and Environment Agency (EA) waste returns.

Records must be retained for 6 years; unless they relate to off-site environmental or health effects, or the condition of the land or groundwater when they shall be retained until permit surrender.

Copies of all relevant Environmental Permits, access to the Management System, and any other codes of practice will be available at the site office, with electronic back-ups.

Records of all waste received at, and removed from, the site will be maintained on site and reported to the EA on a quarterly basis.

Records will be kept in accordance with The Waste (England and Wales) Regulations 2011 (as amended) and the conditions of the Environmental Permit.

# 14 ENVIRONMENTAL MANAGEMENT

## 14.1 Dust & Emission Control

Overall risk: **Low**

Residual risk (after application of management measures): **Low**

The main products handled by SMM comprise scrap metal and end-of-life vessels which are not potentially dust generating.

The control measures to manage the dust and emissions are detailed in the ERA Tables (K508.1~09~004) Section ERA8 and the Dust Management Plan (K508.1~09~007), with a summary detailed below.

Unloading will only be undertaken in designated areas under supervision from trained operatives and dust suppression used if considered necessary. All tipping heights for the waste will be minimised.

Upward facing exhausts will be placed in all equipment used on site.

## 14.2 Odour Control

Overall risk: **Low**

Residual risk: **Low**

The control measures to manage the odour emissions are detailed in the ERA Tables (K508.1~09~004) Section ERA8 and a summary is detailed below.

Wastes accepted do not contain biodegradable material and therefore are not odorous.

All vehicles and machinery are subject to regular preventative inspections and maintenance programmes to maintain fuel efficient operations. Daily checks by operators will be undertaken using pre-check books to record findings.

Waste only remains onsite for a maximum of 24 hours before being transported to the adjacent EMR Facility.

## 14.3 Litter Control

Overall risk: **Medium**

Residual risk: **Low**

The control measures to manage litter are detailed in the ERA Tables (K508.1~09~004) Section ERA9 and a summary is detailed below.

Where litter is identified as a nuisance, the TCM and management will immediately organise the collection of litter by staff. Priority will be given to eliminating the source, following which off-site areas and the site boundary will be cleared. The source of the litter will be investigated and removed to a container ready for disposal.

Regular housekeeping of site surfaces to remove litter and debris to prevent the spread. Staff are required to litter pick on a ‘see it, pick it up’ basis.

### 14.4 Pests, Vermin, Birds

Overall risk: **Low**

Residual risk: **Low**

The control measures to manage the pests, vermin and birds are detailed in the ERA Tables (K508.1~09~004) Section ERA10 and a summary is detailed below.

Daily site inspections and good housekeeping procedures will be maintained to reduce any occurrence and allow appropriate measures to be taken where necessary.

If an increase in a pest population is observed, the source will be investigated to undertake the most effective mitigation measures. If required, a pest contractor would be employed.

### 14.5 Mud and Debris Control

Overall risk: **Low**

Residual risk: **Low**

The control measures to manage the mud and debris are detailed in the ERA Tables (K508.1~09~004) Section ERA11 and a summary is detailed below.

Access to site is either via the pedestrian footbridge from the EMR facility or via vessels from the River Thames, so the likelihood of mud and debris generation is very low. Good housekeeping will be undertaken daily to maintain cleanliness. Daily inspections will also be undertaken, and records of the inspections will be kept onsite.

### 14.6 Water

Overall risk: **High**

Residual risk: **Medium**

The control measures to manage water are detailed in the ERA Tables (K508.1~09~004) Section ERA12 and a summary is detailed below.

Due to the site location on the River Thames, several measures are in place to reduce runoff from the site into this surface water. All depolluting and refuelling will take place in the dry dock barge, which acts as a pollution containment and avoids any potentially polluting substances from being discharged to controlled waters. There will be no direct discharge to surface water from the site.

The removal of any residual liquids or oils from the vessels and the cutting of metal are all carried out within the floating dry dock. The dock is then cleaned thoroughly; spill kits are used to clean up any residual oils that may have spilled. A 150 m containment boom will be installed around the perimeter of the site permit boundary to contain any potential contaminants arising from SMM's operations and prevent them from leaving the permitted area. While the operator cannot prevent third-party vessels from navigating or mooring within this section of the River Thames, the perimeter boom will also provide a degree of protection against contaminants originating from other vessels in the vicinity, helping to minimise the risk of pollution entering the waters within the permitted boundary.

Residual liquids and any dirty water within the dry dock is pumped into and collected in the 6 x 1000 litre IBCs on the pontoon. The IBCs are stored within a bunded containment area formed from a tank that has been cut in half. The dirty water in the IBC is then taken off site by appropriate contractors and disposed of at a licenced facility. The IBCs are visually checked weekly for any leaks.

All oils, chemicals and other industrial liquids are stored in suitably bunded designated storage tanks and appropriate storage containers. Spill kits are present onsite should a spill occur, and employees are trained in their use.

### 14.7 Noise & Vibration

Overall risk: **Medium**

Residual risk: **Low**

The control measures to manage noise and vibration are detailed in the ERA Tables (K508.1~09~004) Section ERA14 and a summary is detailed below.

All site operations will only be undertaken during the day (between 07:00 – 16:00 on weekdays and 07:00 – 12:00 on Saturday). The site is within a commercial area, therefore the noise generated onsite is not expected to exceed the noise generated from the surrounding area. The noise impact assessment concluded that noise emissions from the operation are not expected to create adverse impacts on nearby noise sensitive receptors

All vehicles, plant and machinery will be inspected and maintained regularly in line with maintenance schedule set out by the manufacturer’s specifications.

# 15 EMISSIONS AND MONITORING

A Dust Management Plan (DEMP, K508.1~09~007) has been produced as part of this permit application. Several control measures and monitoring procedures are included in this document to reduce dust emissions from the operations onsite. These include vehicles and plant moving at reduced speeds, monitoring weather conditions onsite and visual monitoring of site conditions.

A noise Impact assessment was carried out at Secure Measures Marine Limited, Manor Road, Erith, Kent, DA8 2AD for a 48-hour period between 14:00 on Tuesday 17th March and 13:00 on Thursday 19th March 2026. It was concluded that the noise emissions from the operation are not expected to create adverse impacts on nearby noise sensitive receptors as the area is widely characterised by industrial and commercial use.

There are no other point source emissions from activities on site that may cause a significant risk, and therefore no other standalone management plans are required.

# 16 CLIMATE CHANGE

The potential effects from climate change have been identified within Table ERA15 of the Environmental Risk Assessment (ERA) (K508.1~09~003), where management procedures and controls are identified to reduce identified risk.

The site is situated in a high-risk area for flooding from rivers and the sea, and in Flood Zone 2 (Fluvial/Tidal Models), where the likelihood of flooding from rivers or the sea is 0.1% each year. The site benefits from flood defences along the bank of the River Thames which are managed and inspected by the Environment Agency. The flood defences comprise concrete walls and sheet-piling.

Due to the site's proximity to the River Thames, climate change may increase the risk of flooding onsite. Vessel deliveries to site are dependent on tide levels and wind conditions, so more extreme weather due to climate change may impact the frequency of activities.

Heat sensitive wastes such as oil and oxy propane gas cylinders may be affected by increased temperatures due to climate change.

Control measures detailed within the ERA include:

- Flood defences are located on the northern site boundary with the River Thames.
- Any heat sensitive wastes (e.g. oil and oxy propane gas cylinders) will be stored in protected areas for example, in buildings or under cover.
- Daily temperature inspections are carried out by site staff and records kept.
- Plant and equipment will be maintained in accordance with their maintenance schedules or when applicable.
- Storage tanks are checked as part of daily site inspections for integrity or signs of leakage.
- Fuelling of plant is to be undertaken on an impermeable surface (dry dock barge) with a suitable spill kit and fire extinguisher available.

The effects of climate change and management will be reviewed on an annual basis, along with the Management System or following an extreme climate event.

# 17 REVIEW THE MANAGEMENT SYSTEM

The MSS will be reviewed in its entirety at least annually or following any substantial change in site operations.

Other activities which may prompt a review of the Management System are variations to the environmental permit, an accident, a complaint, a breach or a change in the site setting or sensitive receptors.

Where the review results in required changes, this will be documented and maintained with the site records, for example, changes to environmental management measures, new or altered equipment.

# 18 SITE CLOSURE

Following completion of restoration works on site, Secure Measures Marine Limited will plan for the closure of the site through maintaining records of waste inputs, site development and maintenance. Following any pollution incidents, records of actions taken, any remedial works, and verification reports undertaken shall be kept, as well as any monitoring results.

To evidence that the site operation has not caused a detrimental impact to the surrounding environment, the information collated during the lifetime of the permit will be utilised to prepare the permit surrender.

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