

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Restoration of Bedwas Tips
Date: 12 October 2021 14:11:36
Attachments: [CCBC Tips Risk Rating.pdf](#)
[001 Bedwas Colliery Wardell Armstrong Technical Review - Sustainability benefits associated with reclamation of Bedwas tips.pdf](#)

Dear [REDACTED],

I have been passed your contact details by [REDACTED] of CCBC who is copied in.

My company Energy Recovery Investments (ERI) has been involved with CCBC in a scheme to conduct the restoration of Bedwas Coal Tips near Caerphilly. CCBC has agreed the lease of the Bedwas tips in order to carry out the restoration.

My colleagues and I have over 40 years' experience in Coal Tip Reclamation and ERI carried out a very successful coal tip reclamation project in 2009 to 2014 cleaning up mine waste from two mines near Abertillery, Vivian and Six Bells Collieries.

Today the site has been restored to upland moorland and has a diverse habitat and the reclamation is such that is difficult to identify that there were coal tips at the site at all.

ERI has been working with CCBC to enable the coal tips at Bedwas to be reclaimed. We have submitted a scoping study to CCBC but we now need confirmation from the Welsh Assembly that they are in favour of the scheme and willing for it to proceed.

CCBC cabinet has given it's backing to the scheme as have all the local councillors.

CCB's has a risk schedule for the 100 plus tips that it has risk rated. I attach the schedule. There are a handful of tips that are currently a serious environmental and public health risk with the Fochriw and Bedwas Tips top of that list.

Many of the other tips, even if unsightly, will probably pose a much lower risk, particularly those that are located on flat ground either at hill tops or spread in the bottom of the valleys. From our experience the risky tips normally fall into two categories

1. The tips built on steep slopes and or have water problems
2. The tips containing high percentages of coal.

Bedwas has 3 tips of which all fit in the above categories. The maintenance of the tips is very costly for CCBC and they want them reclaimed.

We are aware that the number of tips posing a risk to communities is likely to be similar across other County Councils in South and North Wales with each county having several tips that are a major cause for concern.

Problems with most of the tips will have been known to each local authority for some time and yet since 1996 only one major tip reclamation scheme has taken place, which was ERI's Six Bells Land Reclamation conducted between 2008 and 2014.

CCBC unsuccessfully tried to get £20m of public funding for the reclamation of the Bedwas tips circa 2010 in a scheme that would have replicated the majority of the tip reclamations carried out in South Wales which would have been achieved by spreading and consolidating the mine waste followed by a covering of thin substrate and grassed. This would almost certainly have created much better profiled tips but is unlikely to have resulted in the thickly grassed and vegetated tips as those at Six Bells which have been re-laid with the soils from beneath the tips causing the environmental recovery of the land to be the restoration of the existing moorland that once dominated the hillside and along with the rewilding brought about the recovery of the plant and animal life that used to live in this particular habitat. In its own rights this reclamation creates the carbon sink which is now so desirable.

Bedwas is a similar scheme on the top of a ridge between two Welsh valleys. Although the maximum height is 220m above OD rather than 420m at the Six Bells site.

We have a solution to restoring the Bedwas tips but bluntly the problem that concerns everyone is that the restoration is paid for by the extraction of the coal that remains in the tips. Two of the tips have high levels of coal and in our opinion will at some date be a problem as there is already traces of burning in the one tip. No one is currently keen to see coal extracted from anywhere in the UK but recovery from the old mine tips whilst carrying out land reclamation still has substantial merits during the energy transition phase.

Unfortunately the coal left in the tip is not as high quality as the best coal mined from the Bedwas mine and so its use is only as an industrial coal.

Currently in the UK the remaining and ongoing large industrial consumers of coal are cement plants, steel plants and brick manufacturers all of which could use Bedwas or similar coals. From 2022, all these industries will be importing these coals, with the non steel supply coming predominantly from Russia. Russia has one of the poorest environmental credentials of all the industrial nations along with an increasingly poor reputation as a democracy.

Furthermore freshly mined coal releases methane, an even worse climate change gas than CO₂. The methane in tip coals has already been released soon after the coals were deposited on the hillside. This factor along with the lower environmental cost of transportation gives them an emissions advantage over for instance Russian coals. Wardell Armstrong, the independent technical advisors to the Welsh Assembly for the recently produced WA Coal Policy technical review, stated the same in a review of Bedwas tip reclamation carried out on our behalf and which I attach.

The UK and Welsh governments are discussing with the large coal consuming industries what other technologies can be implemented to reduce their climate change emissions. The pressure is on those industries to make improvements before the end of the decade, but until improvements actually happen these industrial plants will consume coal. It's not ideal, but this does give commercial tip reclamation a short window, (each site normally takes 3 -4 years), to get some of the worse tip liabilities, like Bedwas, cleaned up with dramatic environmental improvements and without recourse to the public purse, and actually without adding to the UK's emission of green-house gasses.

The Welsh Assembly, did in the Coal Policy, give the opportunity for exclusions in these circumstances detailed above, although I suspect as a principal the general desire is to avoid such exclusions but if reclamation is being prevented whilst other foreign sources of coal are consumed in UK industrial sites overall this surely is not good for the UK environment.

The philosophy we are putting forward is currently also playing out elsewhere for instance the UK govt is arguing in favour for the licensing of a North Sea Oilfield and more recently with new Gas fields stating that it still makes sense to use our own resources in the transition period.

I do appreciate that there are various sensitivities to be balanced in any discussion regarding coal tips in Wales, particularly in light of the new Welsh Coal Policy, the currently ongoing Law Commission review of the coal tip safety regime in Wales, the existence of numerous high risk tips and the sustainability policy objectives of the Welsh government. ERI has been working on the Bedwas scheme for some 5 years now and we have spent over £300k on the engineering of the scheme to get it to the Scoping Study.

However we have reached the stage where we cannot continue to expend money to further the project unless we can get some agreement with the Welsh Assembly that they are willing to see the project go forward.

I would appreciate if we could have a meeting to discuss the above either at your offices in Cardiff or via Teams / Zoom.

Kind regards

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