



Pollution inventory reporting - food and drink guidance note

Environmental Permitting (England and Wales) Regulations 2010

Regulation 60(1)

Version 6 December 2012

We are the Environment Agency. We protect and improve the environment and make it a better place for people and wildlife.

We operate at the place where environmental change has its greatest impact on people's lives. We reduce the risks to people and properties from flooding; make sure there is enough water for people and wildlife; protect and improve air, land and water quality and apply the environmental standards within which industry can operate.

Acting to reduce climate change and helping people and wildlife adapt to its consequences are at the heart of all that we do.

We cannot do this alone. We work closely with a wide range of partners including government, business, local authorities, other agencies, civil society groups and the communities we serve.

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Environment Agency
Horizon House, Deanery Road,
Bristol BS1 5AH
Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk

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Contents

1. Overview	4
2. Emissions to air	4
2.1. Relevant pollutants	4
3. Emissions to water	5
3.1 Relevant pollutants and emission sources	5
4. Off-site waste transfers	5
4.1 Relevant wastes	5

1. Overview

If we regulate your activity as an A1 facility under the Environmental Permitting (England and Wales) Regulations 2010 (EPR) you will need to submit data to the Pollution Inventory.

You need to report each year. The system opens for reporting on 1 January 2013 and the deadline for submitting is 28 February 2013.

Our general guidance sets out how to report and provides information applicable to all business and industries.

In this guidance you will find helpful information specific to the food and drink sector activities.

You can find additional information on the web:

Pollution Inventory Guidance and glossary: www.environment-agency.gov.uk/pi

2. Emissions to air

Emissions to air from food and drink installations are separated into two categories:

- those from the relevant manufacturing process itself
- those from associated combustion processes (i.e. boilers) on site.

Only process-related releases are covered here. For combustion process releases view the Combustion Sector guidance available on the PI website. Please note, both may produce reportable emissions.

2.1. Relevant pollutants

The main air emissions from food and drink activities are shown in Table 1. Use the table as a guide only and check that there are no other pollutants emitted from your installation.

Table 1 Main air pollutants emitted by food & drink activities and their main sources

Main air pollutants	Main sources
Carbon dioxide	carbonatation , carbonation , fermentation
Sulphur dioxide	sulphitation
Ammonia , HCFCs, HFCs	fugitive losses of refrigerants
Particulates (including PM10s)	material handling, milling , grinding, drying
Non Methane Volatile Organic Compounds	solvent extraction (hexane), brewing , baking , frying, roasting
Methane	cooking / drying

Combustion process releases are not covered in this table.

3. Emissions to water

The general pollution inventory guidance explains what constitutes an emission or transfer.

3.1 Relevant pollutants and emission sources

Table 2 illustrates the main pollutants emitted to water and their main sources. Not all of these are PI reportable substances, but you need to take account of any reportable substances emitted in association with them (for example, metal contents incorporated with total suspended solids). Use the table as a guide only and check that there are no other reportable substances emitted from the process or required to be monitored by permit condition.

Table 2 Main water pollutants generated by food and drink activities

Main water pollutants	Main sources
Total organic carbon	Raw materials and finished products associated with cleaning activities
Phosphorus	Use of phosphoric acid in cleaning activities or nutrient addition for on-site effluent treatment or a component of raw material, for example, milk
Nitrogen	Nutrient addition for on-site effluent treatment or a component of food or drink
Chlorides	Use of salt/brine solution
Suspended solids	Associated with cleaning activities and effluent treatment

4. Off-site waste transfers

You must classify wastes using the European Waste Catalogue (EWC) 6-digit code(s) and the relevant Waste Framework Directive disposal or recovery code(s) (D&R). A full list of these codes is provided our [PI Reporting codes document](#).

4.1 Relevant wastes

- List of Waste (LoW) sub-chapters 02 02, 02 03, 02 04, 02 05, 02 06 and 02 07 contain the main codes that cover the majority of process wastes generated by food and drink activities.
- LoW codes applicable to food and drink activities are included in other sub-chapters, for example, 15 01 packaging materials.
- You should report only wastes generated from the installation itself and not associated wastes from areas outside the installation boundary such as offices or canteens.

4. Take care to properly classify materials. You should only report **waste** to the Pollution Inventory. Certain wastes are now classified as by-products or non-wastes. This is proven by recent case law or the application of waste protocols. If you are uncertain of the status of materials you should seek advice from your local inspector.
5. Tallow used as a fuel is not considered as a waste if an End of Waste application has been accepted by the Environment Agency.
6. Abattoir lairage material, where lawfully landspread, is considered to be a by-product and not a waste and you should not report it under the PI.
7. The revised Waste Framework Directive (rWFD) makes special provision for animal by-products. This is relevant when deciding if your waste needs reporting to the Pollution Inventory.

Animal by-products covered by the Animal By-Product Regulations (ABPR) are excluded from the scope of the rWFD except where destined for landfill, incineration (including co-incineration), biogas or composting. This means that where ABPR requires animal by-products to be sent for incineration, landfill, biogas or composting, they will continue to be considered as waste and must be reported under the PI.

In contrast, animal by-products sent to other routes such as rendering will not be considered as waste and should not be reported under the PI. The status of outputs from rendering activities will be determined by the ultimate fate of the material as described above.

Table 3 indicates the relevant Waste Framework code to be used for various disposal or recovery activities.

Table 3 Relevant Waste Framework codes

Waste operation	WFD code
Landspreading for agricultural benefit of sludges , liquids and solid wastes	R10
Treatment of sludges/liquids on sacrificial land	D2
Use of biomass as a fuel to generate energy, for example, tallow , MBM	R1 ¹
Incineration in dedicated facility (including incineration of animal by-products where required by Animal By-Product legislation)	D10
Disposal to engineered landfills (including animal by-products where required by Animal By-Product legislation)	D5
Anaerobic digestion (AD) where digestate is to be landspread (except where AD waste protocol compliant)	R3
Anaerobic digestion where digestate is landfilled	D8
Composting	R3

¹ To qualify for R1(recovery) status the incinerator must comply with the energy efficiency criterion set out on our guidance at www.environment-agency.gov.uk

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