



# Permitting decisions

## Variation

---

We have decided to grant the variation for **Poplar Farm Pig Unit** operated by **Mr Peter Stuart Kirkwood and Mrs Caroline Kirkwood**.

The variation number is **EPR/RP3037ML/V003**

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

### Purpose of this document

This decision document provides a record of the decision making process. It summarises the decision making process in the decision checklist to show how all relevant factors have been taken in to account.

This decision document provides a record of the decision making process. It:

- highlights key issues in the determination
- summarises the decision making process in the decision checklist to show how all relevant factors have been taken into account
- shows how we have considered the consultation responses

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit and the variation notice. The introductory note summarises what the variation covers.

## Key issues of the decision

### Introduction

- This is a substantial variation for increasing production pig numbers by 2512. This involves the introduction two new production pig buildings and an associated increase in the installation boundary. The operator has not at this time applied to the local council for planning permission for the new production pig buildings.

## New Intensive Rearing of Poultry or Pigs BAT Conclusions document

The new Best Available Techniques (BAT) Reference Document (BREF) for the Intensive Rearing of poultry or pigs (IRPP) was published on the 21st February 2017. There is now a separate BAT Conclusions document which will set out the standards that permitted farms will have to meet.

The BAT Conclusions document is as per the following link

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017D0302&from=EN>

Now the BAT Conclusions are published **all new housing within variation applications** issued after the 21<sup>st</sup> February 2017 must be compliant in full from the first day of operation.

There are some new requirements for permit holders. The conclusions include BAT Associated Emission Levels for ammonia emissions which will apply to the majority of permits, as well as BAT associated levels for nitrogen and phosphorous excretion.

For some types of rearing practices stricter standards will apply to farms and housing permitted after the new BAT Conclusions are published.

This variation determination includes a review only of BAT compliance for new housing introduced with this variation.

### New BAT conclusions review

There are 34 BAT conclusion measures in total within the BAT conclusion document dated 21<sup>st</sup> February 2017.

We have sent out a duly made request requiring the Applicant to confirm that the new housing within the variation application comply in full with all the BAT conclusion measures.

The Applicant has confirmed their compliance with all BAT conditions for the new housing, in their document dated 12/12/17.

These documents have been referenced in Table S1.2 Operating techniques of the Permit.

The following is a more specific review of the measures the Applicant has applied to ensure compliance with the above key BAT measures. The measures are linked specifically to new production pig buildings

BAT measure	Applicant compliance measure
BAT 3 - Nutritional management Nitrogen excretion	The Applicant has confirmed it will demonstrate it achieves levels of Nitrogen excretion below the required BAT-AEL of 13 kg N/animal place/year by an estimation using manure analysis for total Nitrogen content.  Table S3.3 of the Permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.
BAT 4 Nutritional management Phosphorous excretion	The Applicant has confirmed it will demonstrate it achieves levels of Phosphorous excretion below the required BAT-AEL of 5.4 kg P <sub>2</sub> O <sub>5</sub> animal place/year by an estimation using manure analysis for total Phosphorous content. This confirmation was in response to the Not Duly Made Request for further information.  Table S3.3 of the Permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.
BAT 24 Monitoring of emissions and process parameters  - Total nitrogen and phosphorous excretion	Table S3.3 Process monitoring requires the operator to undertake relevant monitoring that complies with these BAT conclusions. Monitoring will be based on calculations using a mass balance of nitrogen and phosphorus based on the feed intake, not manure analysis  Table S3.3 of the Permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions
BAT 25 Monitoring of emissions and process parameters	Table S3.3 of the Permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.

BAT measure	Applicant compliance measure
- Ammonia emissions	The Operator will base monitoring on ammonia emission factors.
BAT 26 Monitoring of emissions and process parameters - Odour emissions	The approved OMP includes the following details for on Farm Monitoring and Continual Improvement: • The staff will perform a daily boundary walk to check the surrounding area for high levels of odour.
BAT 27 Monitoring of emissions and process parameters -Dust emissions	Table S3.3 Process monitoring requires the operator to undertake relevant monitoring that complies with these BAT conclusions.  The Applicant has confirmed they will report the dust emissions to the Environment Agency annually by multiplying the dust emissions factor for each type of pig type and housing by the number of pigs in the relevant building.
BAT 30 Ammonia emissions from pig houses	We have reviewed the Applicant techniques and can confirm they will comply with levels of ammonia below the required BAT-AEL for the following pig types and new pig buildings:  Pigs > 30kg with FSF with weekly (frequent) slurry removal: 2.6 kg NH3/animal place/year.  More detailed assessment provided below.

#### **More detailed assessment of specific BAT measures**

##### **Ammonia emission controls**

A BAT Associated Emission Level (AEL) provides us with a performance benchmark to determine whether an activity is BAT.

##### **Ammonia emission controls – BAT conclusion 30(pigs)**

The new BAT conclusions include a set of BAT-AEL's for ammonia emissions to air from animal housing for pigs. There is a footnote in some of the Ammonia BAT-AELs allowing a higher AEL for existing plant. 'New plant' is defined as plant first permitted at the site of the farm following the publication of the BAT conclusions. 'Existing plant' is defined in the BREF as any plant that is not a 'new plant'. The key phrase is 'first permitted'.

The scope of the variation application determination is to ensure all new housing on existing farms will meet the BAT-AEL's.

The consolidated permit variation will include the addition of BAT AEL'S for existing plant for NH3. The review of the compliance of the installation of these existing plant BAT AEL's will be the subject of a future sector permit review.

The 'existing plant' BAT-AEL will apply indefinitely to any existing housing on any site permitted before 21<sup>st</sup> February 2017 or at least until the next revision of the BREF.

##### **More detailed assessment of AEL's**

##### **Pig housing**

The new production pig buildings are based on weekly frequency of slurry removal and Fully Slatted Floor.

The standard ammonia emission factor for such pig types and buildings is 3.1 kg NH3/animal place/year versus a BAT AEL of 2.6 kg NH3/animal place/year.

However for this specific case we have reviewed the latest data on production pig FSF ammonia emission levels from AHDB Pork trade association research monitoring report dated September 2017. We have validated this report and accept the overall ammonia levels as able to be utilized in relevant cases. The data show ammonia emission factors of less than 2 kg NH<sub>3</sub>/animal place/year for shallow pits as here with slurry frequency removal rates of 7 weeks.

As the slurry removal rate for this installation will be weekly, we have concluded that the BAT AEL of 2.6 kg NH<sub>3</sub>/animal place/year can be complied with for these specific new production pig buildings and specific operating techniques.

## Industrial Emissions Directive (IED)

The Environmental Permitting (England and Wales) (Amendment) Regulations 2013 were made on the 20 February 2013 and came into force on 27 February 2013. These Regulations transpose the requirements of the IED.

This permit implements the requirements of the European Union Directive on Industrial Emissions.

## Groundwater and soil monitoring

As a result of the requirements of the Industrial Emissions Directive, all permits are now required to contain a condition relating to protection of soil, groundwater and groundwater monitoring. However, the Environment Agency's H5 Guidance states **that it is only necessary for the operator to take samples** of soil or groundwater and measure levels of contamination where there is evidence that there is, or could be existing contamination and:

- The environmental risk assessment has identified that the same contaminants are a particular hazard; or
- The environmental risk assessment has identified that the same contaminants are a hazard and the risk assessment has identified a possible pathway to land or groundwater.

H5 Guidance further states that it is **not essential for the Operator** to take samples of soil or groundwater and measure levels of contamination where:

- The environmental risk assessment identifies no hazards to land or groundwater; or
- Where the environmental risk assessment identifies only limited hazards to land and groundwater and there is no reason to believe that there could be historic contamination by those substances that present the hazard; or
- Where the environmental risk assessment identifies hazards to land and groundwater but there is evidence that there is no historic contamination by those substances that pose the hazard.

The site condition report (SCR) for Farm Name (dated 04/10/17) demonstrates that there are no hazards or likely pathway to land or groundwater and no historic contamination on site that may present a hazard from the same contaminants. **Therefore, on the basis of the risk assessment presented in the SCR, we accept that they have not provided base line reference data for the soil and groundwater at the site at this stage and although condition 3.1.3 is included in the permit no groundwater monitoring will be required.**

## Odour

Intensive farming is by its nature a potentially odorous activity. This is recognised in our 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 guidance ([http://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/297084/qeho0110brsb-e-e.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297084/qeho0110brsb-e-e.pdf)).

Condition 3.3 of the environmental permit reads as follows:

"Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour."

EPR/RP3037ML/V003  
Date issued: 31/01/2018

Under section 3.3 of the guidance an Odour Management Plan (OMP) is required to be approved as part of the permitting process, if as is the case here, sensitive receptors (sensitive receptors in this instance excludes properties associated with the farm) are within 400m of the Installation boundary. The closest relevant sensitive receptor is approximately 220 metres to the east of the installation boundary. It is appropriate to require an OMP when such sensitive receptors have been identified within 400m of the installation to prevent, or where that is not practicable, to minimise the risk of pollution from odour emissions.

The risk assessment for the Installation provided with the Application lists key potential risks of odour pollution beyond the Installation boundary. These activities are as follows:

#### Odour Management Plan Review

**The Odour Management Plan dated 12/12/17** covers a list of potentially odorous activities covering both normal and abnormal scenarios, complete with control measures for each scenarios to minimize the risk of odour pollution beyond the installation boundary

The scenarios cover:

- Litter management
- Animal movement
- Slurry and feed management and fugitive emissions
- Pig housing ventilation emissions
- Pig housing clean outs.

The odour monitoring proposed is in the form of daily odour perimeter tours. The OMP also includes a contingency plan with a list of abnormal scenarios with potential for elevated odour levels and remedial actions to minimize risk of odour pollution beyond the installation boundary.

After a review of the OMP we are able to approve it as providing relevant measures to minimize the risk of odour pollution beyond the installation boundary,

#### **Noise**

Intensive farming by its nature involves activities that have the potential to cause noise pollution. This is recognised in our 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 guidance. Under section 3.4 of this guidance a Noise Management Plan (NMP) must be approved as part of the permitting determination, if there are sensitive receptors within 400m of the Installation boundary.

Condition 3.4 of the Permit reads as follows:

Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan, to prevent or where that is not practicable to minimise the noise and vibration.

There are sensitive receptors within 400 metres of the Installation boundary as stated in odour section above. The Operator has provided a noise management plan (NMP) dated September 2 as part of the Application supporting documentation.

The risk assessment for the Installation provided with the Application lists key potential risks of noise pollution beyond the Installation boundary. These activities are as follows:

- Litter management
- Animal movement
- Slurry and feed management and fugitive emissions
- Pig housing ventilation emissions

- Pig housing clean outs.
- Vehicle movements

We have assessed the NMP and the H1 risk assessment for noise and conclude that the Applicant has followed the guidance set out in EPR 6.09 Appendix 5 'Noise management at intensive livestock installations'. We are satisfied that all sources and receptors have been identified, and that the proposed mitigation measures will minimise the risk of noise pollution / nuisance.

**Commented [TGC1]:** Is this paragraph needed as it is repeated in the conclusion below??

### Conclusion

We have assessed the NMP and the H1 risk assessment for noise and conclude that the Applicant has followed the guidance set out in EPR 6.09 Appendix 5 'Noise management at intensive livestock installations'. We are satisfied that all sources and receptors have been identified, and that the proposed mitigation measures will minimise the risk of noise pollution / nuisance.

### **Dust and Bio aerosols**

The use of Best Available Techniques and good practice will ensure minimisation of emissions. There are measures included within the Permit (the 'Fugitive Emissions' conditions) to provide a level of protection. Condition 3.2.1 'Emissions of substances not controlled by an emission limit' is included in the Permit. This is used in conjunction with condition 3.2.2 which states that in the event of fugitive emissions causing pollution following commissioning of the Installation, the Operator is required to undertake a review of site activities, provide an emissions management plan and to undertake any mitigation recommended as part of that report, once agreed in writing with the Environment Agency.

There is one sensitive receptor within 100m of the Installation boundary. This is the Poplar Farm farmhouse which located at National Grid Reference TA30626 28658.

Guidance on our website concludes that applicants need to produce and submit a dust and bio aerosol risk assessment with their applications only if there are relevant receptors within 100 metres of their farm, e.g. the farmhouse or farm worker's houses. Details can be found via the link below:

[www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-dust-and-bioaerosols](http://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-dust-and-bioaerosols).

As there are receptors within 100m of the Installation, the Applicant was required to submit a dust and bio aerosol risk assessment in this format.

In the guidance mentioned above it states that particulate concentrations fall off rapidly with distance from the emitting source. This fact, together with the proposed good management of the Installation such as keeping areas clean from build-up of dust, and other measures in place to reduce dust and risk of spillages (e.g. litter and feed management/delivery procedures) all reduce the potential for emissions impacting the nearest receptors. The Applicant has confirmed the following measures in their operating techniques to reduce dust:

- Contained feed systems
- Shrubbery acting as natural abatement between installation and Poplar Farm residence
- Contained and lockable carcass storage
- Pig buildings door closed as far as possible.

### Conclusion

We are satisfied that the measures outlined in the Application will minimise the potential for dust and bio aerosol emissions from the Installation.

## Ammonia

The applicant has demonstrated that the housing will meet the relevant NH3 BAT-AEL.

There are three Special Area(s) of Conservation (SAC), /Special Protection Area(s) (SPA), /Ramsar sites located within 10 kilometres of the installation. There is one Sites of Special Scientific Interest (SSSI) located within 5 km of the installation. There are also one Local Wildlife Site(s) (LWS) within 2 km of the installation.

### Ammonia assessment – SAC/SPA/Ramsar

The following trigger thresholds have been designated for the assessment of European sites:

- If the process contribution (PC) is below 4% of the relevant critical level (CLe) or critical load (CLo) then the farm can be permitted with no further assessment.
- Where this threshold is exceeded an assessment alone and in combination is required.
- An in combination assessment will be completed to establish the combined PC for all existing farms identified within 10 km of the SAC/SPA/Ramsar.

### **Where sites screen out as <4%**

Screening using the ammonia screening tool version 4.5 dated 08/08/17 has determined that the PC's on the relevant SAC/SPA/Ramsar as listed below for ammonia emissions/nitrogen deposition/acid deposition from the installation are under the 4% significance threshold and can be screened out as having no likely significant effect. See results below.

**Table 1– Ammonia emissions**

Site	Critical level ammonia µg/m <sup>3</sup>	Predicted PC µg/m <sup>3</sup>	PC % of Critical level
Humber Estuary SPA/Ramsar	3*	0.052	1.7
Humber Estuary SAC	3*	0.044	1.5

\* Critical level values taken from APIS website ([www.apis.ac.uk](http://www.apis.ac.uk)) – 08/08/17

**Table 2 – Nitrogen deposition**

Site	Critical load kg N/ha/yr*	Predicted PC kg N/ha/yr.	PC % of critical load
Humber Estuary SPA/Ramsar	8*	0.27	3.4
Humber Estuary SAC	8*	0.228	2.9

\* Critical load values taken from Air Pollution Information System (APIS) website ([www.apis.ac.uk](http://www.apis.ac.uk)) – 08/08/17.

**Table 3 – Acid deposition**

Site	Critical load keq/ha/yr*	Predicted PC keq/ha/yr.	PC % of critical load
Humber Estuary SPA/Ramsar	0.643	0.019	3.0
Humber Estuary SAC	0.643	0.016	2.5

\* Critical load values taken from APIS website ([www.apis.ac.uk](http://www.apis.ac.uk)) – 08/08/17.

No further assessment is necessary.

### Ammonia assessment – SSSI

The following trigger thresholds have been applied for assessment of SSSIs:

- If the process contribution (PC) is below 20% of the relevant critical level (CLe) or critical load (CLo) then the farm can be permitted with no further assessment.

- Where this threshold is exceeded an assessment alone and in combination is required. An in combination assessment will be completed to establish the combined PC for all existing farms identified within 5 km of the SSSI.

#### Humber Estuary SSSI

We have concluded this does not require further assessment for the following reasoning.

A response from Natural England on 23/07/2017 confirmed that advice given in 2011 stating that this site is purely geological, and, whilst they do have some interesting flora, these are not notified features of the SSSI. In line with guidance, no critical level will therefore apply and therefore as this advice still stands no further assessment is required

#### Ammonia assessment - LWS/AW/LNR

The following trigger thresholds have been applied for the assessment of these sites:

- If the process contribution (PC) is below 100% of the relevant critical level (CLe) or critical load (CLo) then the farm can be permitted with no further assessment.

#### Woods Plantation LWS

We have concluded this does not require further assessment for the following reasoning. An email response from the local council dated 21/07/17 confirmed the following

The site will be recommended for deletion based on the personal knowledge of an LWS Panel member. This person has emailed me to confirm that the site is used for pheasant rearing and consequently has a very poor ground flora and no significant ecological interest.

Therefore no further assessment is required.



## Decision checklist

Aspect considered	Decision
<b>Receipt of application</b>	
Confidential information	A claim for commercial or industrial confidentiality has not been made.
<b>Consultation/Engagement</b>	
Consultation	<p>The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement.</p> <p>The application was publicised on the GOV.UK website.</p> <p>We consulted the following organisations:</p> <ul style="list-style-type: none"> <li>• HSE</li> <li>• Local council Environmental Health Department</li> <li>• Public Health England/Director of Public Health. There is one sensitive receptors within 100 metres of the installation boundary.</li> </ul>
<b>The facility</b>	
The regulated facility	<p>We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN 2 'Defining the scope of the installation', Appendix 1 of RGN 2 'Interpretation of Schedule 1'.</p> <p>The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.</p>
<b>The site</b>	
Extent of the site of the facility	<p>The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility The plan is included in the <b>permit</b></p>
Site condition report	<p>The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports.</p>
Biodiversity, heritage, landscape and nature conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.</p> <p>We have assessed the application and its potential to affect all known sites of nature conservation, landscape and heritage and/or protected species or habitats identified in the nature conservation screening report as part of the permitting process.</p> <p>We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified.</p> <p>We have not consulted Natural England on the application. The decision was taken in accordance with our guidance. A HRA Stage 1 assessment has been sent to Natural England for information only (dated 17/01/18).</p>

Commented [TGC2]: Mention boundary change?

Aspect considered	Decision
<b>Environmental risk assessment</b>	
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p> <p>The assessment shows that, applying the conservative criteria in our guidance on environmental risk assessment [or similar methodology supplied by the operator and reviewed by ourselves], all emissions may be categorised as environmentally insignificant.</p>
<b>Operating techniques</b>	
General operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.</p> <p>The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.</p> <p><u>The operating techniques linked to the variation changes are as follows:</u></p> <ul style="list-style-type: none"> <li>• Non-technical summary</li> <li>• Pig feed storage and preparation.</li> <li>• Slurry and manure storage</li> <li>• Housing design</li> <li>• Drainage</li> <li>• Odour, Noise and Dust Management Plans.</li> <li>• BAT compliance responses.</li> </ul> <p>The proposed techniques for priorities for control are in line with the benchmark levels contained in the Sector Guidance Note EPR6.09 and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs.</p>
Odour management	<p>We have reviewed the odour management plan in accordance with our guidance on odour management.</p> <p>We, the Environment Agency, have reviewed and approved the Odour Management Plan and consider it complies with the requirements of our H4 Odour management guidance note. We agree with the scope and suitability of key measures but this should not be taken as confirmation that the details of equipment specification design, operation and maintenance are suitable and sufficient. That remains the responsibility of the operator.</p>
Noise management	<p>We have reviewed the noise management plan in accordance with our guidance on noise assessment and control.</p> <p>We consider that the noise management plan is satisfactory.</p>

Aspect considered	Decision
<b>Permit conditions</b>	
Updating permit conditions during consolidation	We have updated permit conditions to those in the current generic permit template as part of permit consolidation. The conditions will provide the same level of protection as those in the previous permit(s).
Improvement programme	Based on the information on the application, we consider that we do not need to impose new improvement programmes. All the current improvement programs are confirmed as complete
Emission limits	We have decided that emission limits are required in the permit for ammonia BAT AEL's. The BAT AEL's have been added for both new and existing housing.
Monitoring	We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.
Reporting	These monitoring requirements have been imposed in order to ensure compliance with Intensive Farming BAT conclusions document dated 21/02/17.
<b>Operator competence</b>	
Management system	There is no known reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.
<b>Growth Duty</b>	
Section 108 Deregulation Act 2015 – Growth duty	<p>We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.</p> <p>Paragraph 1.3 of the guidance says:  “The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”</p> <p>We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.</p> <p>We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.</p>

## Consultation

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public and the way in which we have considered these in the determination process. The consultation and advertising ran from 14<sup>th</sup> December 17 to the 16<sup>th</sup> January 2018.

### Responses from organisations listed in the consultation section

<b>Response received from</b>
<b>Public Health England dated 20/12/17</b>
<b>Brief summary of issues raised</b>
Dust and Bio aerosol emissions
<b>Summary of actions taken or show how this has been covered</b>
Dust management plan in place

<b>Response received from public</b>
<b>Confidential response dated 21/12/17</b>
<b>This response has been repeated and sent in by an additional 412 people between 05/01/18 and 18/01/18.</b>
<b>Brief summary of issues raised</b>
Animal health issues. Specific issue relevant to our regulatory role is that of dead stock being left in the open with potential for pollution linked to odour and flies
<b>Summary of actions taken or show how this has been covered</b>
The operator has provided an action plan confirming controls and training improvements to ensure this will incident will not be repeated. This response is dated 10/01/18
The response from the operator specifically states as follows
<i>"We can confirm that all fallen stock are stored in a locked dedicated container until disposal. The occurrence cited in the public response report is an isolated incident and re-training has been given to all relevant staff to stress the importance of correct storage of deadstock. There is a dedicated, lockable store near the incinerator. Large carcasses, e.g. large sow, are stored in a bucket to contain any fluids and locked in a vermin-proof shed."</i>
The Environment Agency area compliance staff have confirmed that this is a well-managed site and there has not been any other specific concerns linked to this installation.
We consider that the operator has put adequate controls in place to minimize risk of re-occurrence of this specific incident linked to carcass containment under the scope of the Environment Agency and that they have shown themselves to be a competent operator to be granted a permit under the Environmental Permitting Regulations to operate such an intensive farming installation

<b>Response received from public</b>
<b>Confidential responses – grouped together as same point</b> <ul style="list-style-type: none"> <li>• Response 111 dated 04/01/18</li> <li>• Response 276 dated 05/01/18</li> <li>• Response 292 dated 05/01/18</li> <li>• Response 414 dated 15/01/18.</li> </ul>
<b>Brief summary of issues raised</b> <ul style="list-style-type: none"> <li>• General concerns linked to Animal Health at the installation.</li> </ul>
<b>Summary of actions taken or show how this has been covered</b> <p>The Environment Agency area compliance staff have confirmed that this is a well-managed site. The operator has put in a place an action plan to resolve the specific issue of carcass containment, as discussed above.</p> <p>We consider that the operator has put adequate controls in place to minimize risk of re-occurrence of this specific incident linked to carcass containment under the scope of the Environment Agency and that they have shown themselves to be a competent to be granted a permit under the Environmental Permitting Regulations to operate such an intensive farming installation</p> <p>Animal welfare is not an issue under the Environment Agency's remit. It does not form part of the Environmental Permit decision making process. The Environment Agency is responsible for ensuring that its legislative obligations are met and that the activities at the Installation do not have an unacceptable impact on the environment.</p> <p>The primary regulator for animal health is the Animal and Plant Health Agency (APHA), whose primary purpose is to help safeguard animal health and welfare and public health. Therefore they are primarily responsible for ensuring the farming industry has measures in place to effectively deal with any disease outbreaks on site.</p>