

## **Environment Agency permitting decisions**

### **Bespoke permit**

We have decided to grant the permit for Wixland Mill operated by NWF Agriculture Limited.

The permit number is EPR/UP3131RB/A001

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:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

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

### **Structure of this document**

- Description of main features of the installation
- Key issues
- Annex 1 the decision checklist
- Annex 2 the consultation and web publicising responses

## Description of the main features of the Installation

Wixland Mill is an animal feed manufacturing facility, operated by NWF Agriculture Limited, sited in Wixland, Atherington, Devon. The mill installation manufactures compound animal feeds, which are suitable for consumption by an animal without further processing and has been in operation since the early 1970s. The site was previously regulated under the LAPPC regime but now requires a Part A environmental permit, following the 2013 update to the Environmental Permitting Regulations which implemented the Industrial Emissions Directive (IED). This redefined the thresholds for the food and drink sector based on the maximum production capacity of the installation.

*Section 6.8, Part A(1) (d) (ii) (a): Treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed from only vegetable raw materials with a finished product production capacity of more than 300 tonnes per day.*

The key stages being receipt and storage of raw materials, weighing, grinding, mixing, conditioning, pressing, cooling and coating. Finished products are stored prior to being automatically loaded to bulk vehicles for delivery to customers. Typical production totals 100,000 tonnes per annum of compound feeds according to the requirements of the market. The installation operates continuously with production scheduled 24 hours a day and for 6 days a week during most of the year, with week-round operation during periods of peak demand during the winter months.

The main emissions to air arise from two product coolers, a raw material grinder and the boiler plant. There are no emissions to watercourse or sewer. The effluent produced by the installation consisting of condensate from the compressors which is collected and undergoes oil-water separation, small volumes of boiler water blowdown and vehicle washings water, are combined with the surface water run-off (site drainage) and is discharged to groundwater via a series of soakaways.

The following directly associated activities also occur on site:

### Raw material handling and storage

The receipt and storage of raw materials is undertaken in dedicated areas of the installation. Different handling techniques are used dependent upon the nature of the materials and the volumes in which they are received to site. Delivery of raw materials are generally limited to daylight hours and are supervised fully by site operatives such that:

- Only the correct materials are delivered to site, which ensures product quality and minimises waste generation;
- Proper unloading procedures are followed, so that accidental releases of the raw materials are avoided; and
- In the event of a spill during a delivery, the overspill materials are promptly and properly dealt with according to site procedures.

All bulk materials (both solid and liquid) are conveyed around the main building using enclosed mechanical conveying systems or pumped pipe systems as applicable.

#### Finish product storage and dispatch

Finished products are conveyed to one of the dedicated finished product silos located within the main process building, prior to dispatch to third party customers. The internal finished product bins are fitted with high level probes linked to the process control system to prevent overfilling. The delivery conveyors are also fitted with detection equipment that will automatically stop the conveyor to prevent overfilling. Product despatch is conducted within a covered drive-through outloading bay attached to the main building. Bulk delivery vehicles are positioned onto the discharge weighbridge and products are then conveyed from the finished product holding bins to the appropriate discharge pipe and into the vehicle for delivery to the customer. Prior to vehicle dispatch from the installation all vehicles are covered with a ground operated roll over sheet.

#### Utilities

In support of the production processes there are a number of site utilities:

##### 1. Steam Raising

A dedicated steam-raising plant is operated within the installation. The steam generation plant is a single steam raising boiler fuelled by kerosene, which is the only readily available and commercially viable fuel at the installation due to its location. Steam is supplied to a ring main and is primarily used in the conditioning process. Steam may also be used to heat viscous liquid materials (vegetable oils) so that they can be readily pumped to their points of use. The boiler, which has a thermal input of 1.6MW, is of a conventional water tube design with the heated fluid contained in a fully welded tube bank. The boiler undergoes regular maintenance and its combustion efficiency is checked and optimised by appropriately trained third party contractors.

##### 2. Boiler feed water treatment

Potable water is used for boiler feed water. The water is softened before use, pH adjusted and dosed with a scale inhibitor and an oxygen scavenging chemical to prevent corrosion. Blowdown of water from the boiler is undertaken periodically to prevent the build-up of solids; the blowdown is routed to the surface water soakaway system.

##### 3. Air compressors

The site operates a number of screw compressors for the generation of compressed air, which serves the production lines and is also used for material conveyance around the installation. Condensate from the compressors is collected and undergoes oil-water separation prior to discharge to ground via a soakaway.

### Cleaning and sanitation

The installation operates a cleaning and sanitation programme, as part of the site's Quality Management System (QMS). In order to minimise pollution during cleaning, production is planned to sequence similar product batches together, therefore minimising changeovers and the need for cleaning. Cleaning and maintenance activities are typically scheduled for one day per week. The intent of this programme is to minimise process downtime due to breakdowns and to maximise product yield and quality. The following practices are employed:

- All areas of the plant are cleaned on a routine basis;
- All waste is properly disposed of where recycling into the process is not possible;
- Raw material, work in progress and product spills are immediately cleaned up and assessed and, where practicable, re-used in the process;
- All process operators keep their work areas clean and orderly;

The installation uses cleaning chemicals for general cleaning around the site to maintain an acceptable standard of housekeeping, to complement pest control programmes and to support the corrective actions implemented for minor environmental incidents (such as spillages).

The feed mill is located in a predominantly rural location. The nearest sensitive receptor is a single residential property located 10m from the northern installation boundary (50m from the works façade).

There are no SACs, SPAs, or Ramsars within 10km of the site. There are no SSSI within 2km of the site.

## **Key issues of the decision**

The application submission contains a number of supporting documents that describe the controls and operating techniques at the installation, having regard for Best Available Techniques (BAT) requirements, as specified in our guidance and to ensure compliance with the environmental permit conditions. These key controls and techniques are described in the following sections.

### **General Management**

An Environmental Management System (EMS) covering the activities at the Wixland feed mill site is currently being implemented. The system is being developed to be consistent with the requirements and principles of the ISO 14001 standard and will be formally certified to the standard by accredited external assessors. These procedures and controls will be subject to regular review so that they remain relevant both to the operation of the site and to the legislative environment in which it operates. Procedures that are included in the EMS ensure that the personnel responsible for any activities with the potential for significant environmental impact are both qualified and competent to carry out their duties. We have imposed improvement conditions to ensure that the Operator produces and implements an Environment management system in accordance with Environment Agency guidance within 6 months of permit issue.

### **Odour**

Odorous raw materials are consumed in the process and the installation has the potential for causing odorous emissions primarily through the conditioning process and associated product cooling and through the storage of odorous raw materials such as molasses. The products themselves are not significantly odorous. The conditioning and cooling processes can lead to the release of Volatile Organic Compounds (VOCs), which are frequently associated with odour. However, monitoring of odours at the boundary of the installation (sniff testing) undertaken by the operator appears to indicate that the off-site impact is not significant.

The systems employed to reduce odorous emissions from the installation are summarised below:

- Raw material delivery and storage : All bulk raw materials used in the installation are transferred within enclosed systems to their ultimate point of storage, such as bulk storage tanks. Packed materials are kept within their primary packaging and are stored in the main warehouse until required for use.
- Materials conveyance: All odorous materials used in the process are stored in appropriate sealed containers, such as bulk storage tanks prior to incorporation into the product. Conveyance is all within enclosed systems which do not vent externally
- Conditioning and cooling: While it is recognised that low levels of odours are emitted from the conditioning and cooling processes (i.e.

from the cooler exhaust stacks), it is unlikely that these odours result in the creation of significant off-site nuisance.

The feed mill is located in a predominantly rural location. The nearest sensitive receptor is a single residential property located 10m from the northern installation boundary (50m from the works façade) Whilst this property is considered to be ancillary to the installation, it falls outside of the permitted boundary. Therefore, consideration must be given to the potential impact on amenity and human health of the occupants of the property from particulate matter. However, the installation has been in operation since the 1970s and there have been no known complaints from the property. Other residential properties are located 350m southwest of the site. The applicant states that the site has never been the source of any odour complaints. At this time we do not require a site specific Odour Management Plan, however the permit conditions enable the Environment Agency to require the operator to develop and implement an OMP if deemed necessary.

### **Noise and vibration**

Noise assessments for key operational equipment are undertaken and corrective action is taken in the event that a specific item of equipment is emitting an abnormal noise. The majority of noise sources associated with the facility, such as the processing line, grinding and mixing plant, and conveyance systems, are internal to the process buildings. The site is not known to be the source of any significant off-site noise. Key noise sources are:

- Internal noise sources: The majority of noise sources associated with the facility, such as the processing line, grinding and mixing plant, and conveyance systems, are internal to the process buildings. According to the operator, the building is well-maintained and operational procedures dictate that doors and windows are kept closed when possible. Consequently, the potential for the internal noise environment to affect the external environment is minimised.
- External noise sources: A range of fixed plant is located external to the main production building, including:
  - Bulk grain intake;
  - Product despatch bay;
  - Pumps; and
  - Ventilation fans.

There is currently no quantitative data available on the noise emissions from these, but a subjective assessment undertaken by the operator appears to indicate that these are not clearly audible at the site boundary. The subjective assessment was a desk based exercise which identified the potential noise receptors and potential sources of noise from the operation of the Installation. The qualitative assessment collated all current information relating to noise, drawing conclusions from site records and anecdotal evidence from site operatives. The subjective assessment identified the most significant sources of noise

will be enclosed within the main processing building or other suitable noise enclosure.

- **Mobile Noise Sources:** There are a number of mobile external noise sources, which predominately relate to Heavy Goods Vehicle (HGV) movements during loading and unloading activities. The potential for excessive noise from vehicle movements will be controlled through careful management and through scheduled maintenance. Wherever possible, delivery and despatch activities are scheduled for normal working hours.
- **Maintenance:** Poorly maintained process equipment is a potential source of noise generation. As part of the ongoing operating and maintenance programmes implemented by NWF, noise assessments for key operational equipment are undertaken and corrective action is taken in the event that a specific item of equipment is emitting an abnormal noise. This preventative action minimises the likelihood of noise being generated as parts degrade.

The applicant states that the site has not been the subject of any complaints regarding noise and vibration. In the event of any complaint in future, NWF will ensure that it is thoroughly investigated and appropriate remedial action is carried out promptly.

At this time we do not require a site specific Noise Management Plan, however the permit conditions enable the Environment Agency to require the operator to develop and implement an NMP if deemed necessary.

## **Fugitive Emissions**

### Emissions to air and water

The installation has the potential to release fugitive emissions, in particular particulate matter to air. The applicant has identified the source of fugitive emissions, management and plant controls are in place for fugitive emissions to air. These controls include:

- Preventative and reactive maintenance programmes to minimise leaks from the process.
- The storage and maintenance of dusty materials within enclosed or covered areas (such as silos for bulk materials, primary packaging for packaged materials and skips for waste).
- All bulk materials (both solid and liquid) are conveyed around the main building using enclosed mechanical conveying systems or pumped pipe systems as applicable. The use of enclosed conveyance minimises the potential for fugitive emissions. Any dust captured within the system is returned into the process.
- Areas liable to produce fugitive dust are inspected on a regular basis and corrective action to minimise these losses is taken where appropriate.
- The use of abatement equipment:

- Dust filters and Dust Separation Units (DSUs), as required, for the various stages of processing (grinding and cooling operations); and
- Local exhaust ventilation, where required.
- Effective housekeeping, including external cleaning of the process building and stockyards.

#### Emissions to sewer, surface water and ground water

The site has been designed to limit the risk of substances inadvertently entering surface water, foul drainage systems or groundwater. Chemicals are stored in appropriate containers (such as the supplier's primary packaging or bulk storage tanks) that are fit for purpose in bunded areas or on hardstanding in designated storage areas. Spill kits are available in the unlikely event that an environmental incident may occur.

### **Point source emissions**

#### Emissions to air

Throughout the process, appropriate controls, both manual and automated, are applied to ensure that emissions to air are minimised and where appropriate abated. Suitable controls are in place for the handling of raw materials, wastes and products such that the potential for emissions from these activities is minimised. A range of abatement systems are employed throughout the process to remove particulate matter:

- Dust filters and Dust Separation Units (DSUs), as required, for the various stages of processing (grinding and cooling operations); and
- Local exhaust ventilation, where required.

The applicant has undertaken a H1 assessment on the impact of particulate matter. The results of this show that the emission of PM2.5 and PM10 from the site screen out as insignificant when assessed against the long-term standard. In terms of the short-term standard, emissions of PM2.5 also screen out, whilst PM10 emissions cannot be fully deemed as insignificant as the short-term PC is greater than 20%.

However, the feed mill is located in a predominantly rural location with the nearest residential properties located approx. 350m southwest of the site. The emissions from the three point sources on site emit from short stacks, with zero effective height, meaning that the impacts are very localised. There is a single residential property located 10m from the northern installation boundary (50m from the works façade). Whilst this property is considered to be ancillary to the installation (it is a mill workers residence), it falls outside of the permitted boundary and therefore, consideration must be given to the potential impact on amenity and human health of the occupants of the property from particulate matter. However, given that the installation has been



in operation since the 1970s and there have been no known complaints from the property we are satisfied that there has been no known negative impact from the mill on the inhabitants on this property. The local background concentration, which takes into consideration the existing impacts from this site, do not exceed the Air Quality Standard at  $12.2\mu\text{g}/\text{m}^3$  for PM10 and  $8.06\mu\text{g}/\text{m}^3$  for PM2.5 respectively. In addition, the applicant used abatement systems on the three point source emissions and the level of particulates are below the Benchmark levels which is considered to demonstrate BAT for the sector.

The combustion gas emissions from the boiler plant are not measured and are not considered to be significant. Combustion plants with a thermal input less than 20MW are only covered by EPR if they are an associated activity to any of the listed activities. As stand-alone units, they are not considered to be major sources of pollution. The boiler thermal input is 1.6MW. The boiler combustion efficiency is regularly tested on a 12 monthly basis.

Emissions from grinder vents, silo or tank breather vents, extraction systems servicing material intakes, conveyancing systems and despatch systems are not considered to be significant. This is because they are typically characterised by low volume flows and almost entirely fitted with bag filters, which are considered a suitable BAT option for dust control.

#### Emissions to sewer, surface water and ground water

There are no emissions to sewer or surface water. The effluent produced by the installation consisting of condensate from the compressors which is collected and undergoes oil-water separation, small volumes of boiler water blowdown and vehicle washings water, are combined with the surface water run-off (site drainage) and is discharged to groundwater via a series of soakaways. There are no permitted abstractions or source protection zones nearby and the site sits on sandstone, which will allow natural attenuation, and is not on a principal aquifer.

### **Resource efficiency and waste management**

#### Raw materials

Raw materials are selected to meet the requirements of the end market. All raw materials used in the product are approved for use under the Agriculture Feeding Stuffs Regulations 2000 and the Medicated Feeding Stuffs Regulations 2002. As part of the EMS other raw materials consumed (such as process oils) will be frequently reviewed, with the aim to improve process performance and to minimise potential environmental impact. The installation product yield on raw materials consumed is close to 100% (based on dry mass). All raw materials are delivered by approved hauliers who are registered as being competent in delivering animal feed under the UFAS-accredited scheme for hauliers (Trade Assurance Scheme for Combinable Crops (TASCC)). All packaged materials (both solid and liquid) are stored in their original primary packaging prior to use.

### Waste minimisation

The installation has been designed to minimise process losses and waste generation. Only the correct materials are delivered to site, which ensures product quality. The installation product yield on raw materials consumed is close to 100% (based on dry mass).

### Waste storage

The storage locations for the various waste streams are well-established. The waste storage areas are also located away from sensitive boundaries and watercourses. The waste storage areas are regularly inspected and all non-conformities (such as leaking containers or de-segregation of waste streams) are reported, investigated and corrected. These inspection procedures will be reinforced on implementation of the site's EMS to ensure ongoing application of BAT to the waste handling undertaken at the site.

### Waste handling

The installation generates and subsequently handles only small quantities of waste. As part of the management system these wastes are appropriately handled. Specific areas within the installation are designated for waste handling in which waste streams arising from the installation are appropriately segregated, the installation generates non-hazardous waste and very small quantities of hazardous waste, such as waste oils. The waste storage areas are appropriately designed and maintained. These areas have adequate capacity for the quantity of wastes generated.

### Pests

The building structure is maintained to prevent access to the production and dispatch areas from birds, rodents and insects which may adversely affect the quality of the finished goods. Pest control programmes are operated by approved third party contractors, in accordance with the UFAS code of practice. Records are maintained of all pesticides utilised and the type of applications employed.

### Waste recovery or disposal

The efficient use of raw materials is a key element of process control at the installation. Wherever possible, waste products and work-in-progress materials are recovered for reuse in the process. Site targets have been set to minimise and, ultimately, eliminate the disposal of biodegradable waste from the site to landfill. Appropriately licensed third parties are contracted to collect and dispose of and/or recover, off site, all of the site's waste. NWF has an ongoing programme to review potential opportunities to increase the recovery of usable materials from its waste streams.

### Energy usage

The operations undertaken at the Wixland Feed Mill site are party to a negotiated Climate Change Levy Agreement (CCA) through the Agricultural Industries Confederation (AIC) trade body. NWF is committed to the implementation of appropriate cost-effective energy efficiency measures and,

as part of a trade body initiative, has implemented an energy efficiency plan and the site is accredited to ISO 50001.

As part of the management objective to bring about continuous improvement at the site, NWF has developed an energy efficiency plan to minimise the use of energy at the installation:

- The purchase of energy efficient equipment, where appropriate;
- Maintenance and operation of equipment in an efficient manner; and
- Continual and periodic review of operations and identification of areas or practices that would result in improved energy efficiency

The plant is designed to maximise the use of gravity feed conveyance where possible, which minimises the energy consumption associated with material handling.

### Water Use

Overall water usage at the installation is relatively low. Given the hygiene requirements of the food manufacturing process, only potable water may be used in the installation and water recovery techniques are not considered appropriate for use at the site. The principal uses of water in the installation are:

- As a product ingredient;
- Cleaning activities;
- Boiler water (steam is used directly in the conditioning process and indirectly for elements of process heating. Fresh water is required to make up the boiler blow down); and
- Domestic-type use.

All water systems in use on the installation are subject to preventative maintenance to minimise leaks.

## Annex 1: decision checklist

This document should be read in conjunction with the application, supporting information and permit/notice.

Aspect considered	Justification / Detail	Criteria met
		Yes
<b>Receipt of submission</b>		
Confidential information	A claim for commercial or industrial confidentiality has not been made.	✓
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on commercial confidentiality.	✓
<b>Consultation</b>		
Scope of consultation	<p>The consultation requirements were identified and implemented. The decision was taken in accordance with our Public Participation Statement and our Working Together Agreements.</p> <p>For this application we consulted the following bodies:</p> <ul style="list-style-type: none"> <li>• North Devon District Council</li> <li>• Health and Safety Executive</li> <li>• Public Health England</li> <li>• Director of Public Health</li> </ul>	✓
Responses to consultation and web publicising	<p>The web publicising and consultation responses (Annex 2) were taken into account in the decision.</p> <p>The decision was taken in accordance with our guidance.</p>	✓
<b>Operator</b>		
Control of the facility	We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on what a legal operator is.	✓
<b>European Directives</b>		
Applicable directives	All applicable European directives have been considered in the determination of the application.	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
<b>The site</b>		
Extent of the site of the facility	The operator has provided plans which we consider are satisfactory, showing the extent of the site of the facility including discharge points.	✓
Site condition report	<p>The operator has provided a description of the condition of the site.</p> <p>We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under IED–guidance and templates (H5).</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>Umberleigh Bushment, Stowford Down, Knapp Wood, Knowle Wood, Mill Wood &amp; Fisherton Wood and Brightley Barton Local Wildlife Sites are within 2 km of the installation. Knowle timber lee Woods, KnappWood, Brightley Wood and Mill/Fisherton Woods are Ancient Woodlands within 2km of the installation.</p> <p>On that basis that the site has been in operation for many years without any reported impacts, and there are no changes to operations proposed as part of this permit application, we are satisfied that the installation will not have a significant adverse impact on the designated sites.</p> <p>We have not formally consulted on the application. This decision was taken in accordance with our guidance.</p>	✓
<b>Environmental Risk Assessment and operating techniques</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>	✓
Operating techniques	We have reviewed the techniques used by the operator and compared these with the relevant guidance notes	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>and Sector Guidance (TGN EPR 6.10 and PGN 6/26(13)).</p> <p>It has been demonstrated that the emissions from the installation (detailed in the Key Issues section of this document) are not significant. The Environment Agency agrees that the Applicants techniques are BAT for the installation.</p>	
<b>The permit conditions</b>		
Raw materials	We have not specified limits and controls on the use of raw materials and fuels.	✓
Improvement conditions	<p>Based on the information on the application, we consider that we need to impose improvement conditions.</p> <p>We have imposed improvement conditions to ensure that:</p> <ul style="list-style-type: none"> <li>➤ The Operator shall produce and implement an Environment management system in accordance with Environment Agency guidance.</li> <li>➤ Appropriate measures are in place to ensure that effective containment measures are in place. Shortfalls in the bunding identified by us should be address and remediated to ensure they comply with the requirements set out in CIRIA Report C736.</li> </ul>	✓
Incorporating the application	<p>We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.</p> <p>These descriptions are specified in the Operating Techniques table in the permit.</p> <ul style="list-style-type: none"> <li>• B3 of the application section 3 - Answers to Section 3 on application form Part B3 including references to the Food and Drink Sector Guidance EPR 6.10 and the Food, Drink and Milk Industries BREF.</li> <li>• I. Management</li> <li>• IX. Environmental Risk Assessment</li> <li>• III. Process Description</li> </ul>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<ul style="list-style-type: none"> <li>• Appendix B.CCA Agreement</li> <li>• Schedule 5 responses dated 23/12/16, 30/01/16 and 10/02/17</li> </ul>	
Emission limits	<p>We have decided that emission limits should be set where appropriate in the permit.</p> <p>We have not set emission limits for the combustion plant as the plant is considered small and the emissions are likely to be insignificant.</p> <p>Whilst it has been demonstrated that vents in process areas will not emit particulate matter in insignificant quantities, ELVs have been set for particulates on these emission points in accordance with PGN 6/26(13)</p> <p>These decisions were made in accordance with our guidance.</p>	✓
Monitoring	<p>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.</p> <p>These monitoring requirements have been imposed in order to ensure emissions do not exceed benchmark levels.</p> <p>We made these decisions in accordance with TGN EPR 6.10 and PGN 6/26(13).</p> <p>Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.</p>	✓
Reporting	<p>We have specified reporting in the permit.</p> <p>The reporting requirements are in regard to emissions, annual production and performance parameters.</p> <p>We made these decisions in accordance with TGN EPR 6.10 and PGN 6/26(13).</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
<b>Operator Competence</b>		
Environment management system	<p>There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with our guidance on what a competent operator is.</p> <p>Operator currently in the process of implementing the system and it is being developed to be consistent with the requirements and principles of the ISO 14001 standard and will be formally certified to the standard by accredited external assessors. An improvement condition has been added to the permit to ensure this.</p>	✓
Relevant convictions	<p>The Case Management System and National Enforcement Database have been checked to ensure that all relevant convictions have been declared.</p> <p>No relevant convictions were found.</p>	✓
Financial provision	<p>There is no known reason to consider that the operator will not be financially able to comply with the permit conditions. The decision was taken in accordance with our guidance on what a competent operator is.</p>	✓



## Annex 2: External Consultation and web publicising responses

Summary of responses to consultation and web publication and the way in which we have taken these into account in the determination process.

<i>Response received from</i>
Devon Council – Planning & Environmental Health team
<i>Brief summary of issues raised</i>
No objection. Records confirm that there are no noise or amenity related conditions in placed on any of the planning applications approved at the site and there have not been any complaints received by the Planning Authority or any enforcement investigations with regard to amenity.
<i>Summary of actions taken or show how this has been covered</i>
No action necessary

<i>Response received from</i>
Devon Council – Environmental Health team
<i>Brief summary of issues raised</i>
No objection. Records confirm that there are no noise complaints in the last three years.
<i>Summary of actions taken or show how this has been covered</i>
No action necessary

<i>Response received from</i>
Public Health England
<i>Brief summary of issues raised</i>
No objection. Concerns raised regarding compliance with Part B Permit and potential odour issues from the site.
<i>Summary of actions taken or show how this has been covered</i>
LA contacted to confirm compliance with Part B Permit and confirmation of odour complaints, received the following  <i>The Council has no records of noise, odour or other amenity complaints relating to NWF Agriculture Limited's operation of this facility.</i>
No further action necessary.

No responses were received from the following:

- Local community via Web Publication
- Health and Safety Executive
- Director of Public Health