

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Butcher's Pet Care Ltd

Crick Pet Food
Dockham Way
Crick
Northamptonshire
NN6 7TZ

Variation application number

EPR/BN3316IU/V009

Permit number

EPR/BN3316IU

Crick Pet Food

Permit number EPR/BN3316IU

Introductory note

This introductory note does not form a part of the notice

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made. All the conditions of the permit have been varied and are subject to the right of appeal.

This consolidated permit has been issued following a full review against the best available techniques (BAT) conclusions for the Food, Drink and Milk Industries published on 4th December 2019 in the official journal of the European Union.

We have implemented the requirements of the Medium Combustion Plant directive and incorporated post-dated requirements for 2025.

The schedules specify the changes made to the permit.

The main features of the permit are as follows:

The Installation, Crick Pet Food, is located at approximately 7 kilometres East of Rugby town, just off M1, at NGR SP 58448 73633. The main activity carried out at this site the processing of meat products, including by mixing it with dry ingredients, to produce canned pet food. The primary processes involved in production are intake of raw materials, processing, mixing, and heating. A number of directly associated activities are used, including storage of raw materials and finished products, ice making plant, storage of waste generated within the installation, and an effluent treatment plant.

The biological wastewater treatment plant processes water resulted from production process and cleaning activities. The effluent is discharged to Clifton Brook via water emission point W2. Uncontaminated surface water resulted from the installation's roofs and pavement is discharged to a reed bed via interceptor through emission point W3.

For the scope of pet food production, there are 2 boilers on site with a capacity of 10.6 MWth each, used for steam generation. These Boilers release emissions to air through a common stack via air emission points A1 and A2 in the form of flue gases from the combustion of natural gas fuel.

On the site there is also a 1.5MWth combined heat and power (CHP) plant that generates heat and electrical energy that are used in the installation. This CHP releases flue gases through air emission point A3 resulted from the combustion of natural gas fuel.

There are no European sites in the vicinity of the installation and the nearest human receptor is 250m away from the installation's southern boundary. The Operator has an uncertified environmental management system (EMS).

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application received	Duly made 10/09/2004	Application received for the production of pet food

Status log of the permit		
Description	Date	Comments
EPR/BN3316IU/A001		
Additional information received	17/01/2005	
Additional information received	21/02/2005	
	24/02/2005	
Permit determined EPR/BN3316IU	20/06/2005	Permit issued to Butchers Pet Care Limited
Variation application EPR/BN3316IU/V002	Duly made 05/01/2006	
Variation application EPR/BN3316IU/V002	23/06/2006	Variation notice issued
Variation application EPR/BN3316IU/V003	Duly made 26/06/2010	
Variation application EPR/BN3316IU/V003	08/12/2010	Variation notice issued
Partial surrender application EPR/BN3316IU/S004	Duly made 10/09/2011	Application to surrender part of the installation area.
Additional information received	06/10/2011	Revised site plan.
Partial surrender determined EPR/BN3316IU/S004	06/10/2011	Partial surrender complete.
Variation application EPR/BN3316IU/V005 (dated 02/11/2011)	Issued 03/11/2011	Application for administrative variation to correct an error.
Variation application EPR/BN3316IU/V006	25/07/2013	Agency variation to implement the changes introduced by IED.
Application variation EPR/BN3316IU/007	Duly made 04/09/2017	Application to increase area of permit due to building extension.
Application variation EPR/BN3316IU/V007	13/09/2017	Varied permit issued.
Application variation EPR/BN3316IU/V008	Duly made 31/12/2020	Application to vary the permit (addition of a new MCP to existing gas fired boilers on site).
Additional information received	06/01/2021	Revised site plan showing emission points.
Additional information received	22/02/2021	Revised site plan showing emission points.
Variation application determined EPR/BN3316IU/V008	06/04/2021	Variation notice issued.
Application EPR/BN3316IU/V009 (variation and consolidation)	Regulation 61 Notice response received 08/07/2022	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.

Status log of the permit		
Description	Date	Comments
Request for further information (23/03/2023)	Received 06/04/2023	Information provided regarding ETP discharge, energy efficiency measures, refrigerants, buffer capacity, BAT-AELs to water, and SCR.
Clarifications request (11/04/2023)	Received 13/04/2023	CHP capacity correction.
Variation determined and consolidation issued EPR/BN3316IU (Billing ref. HP3446QM).	24/05/2023	Varied and consolidated permit issued in modern format.

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

Permit number

EPR/BN3316IU

Issued to

Butcher's Pet Care Ltd ("the operator")

whose registered office is

Baker Group House

Dockham Way

Crick

Northamptonshire

NN6 7TZ

company registration number 01716195

to operate a regulated facility at

Crick Pet Food

Dockham Way

Crick

Northamptonshire

NN6 7TZ

to the extent set out in the schedules.

The notice shall take effect from 24/05/2023.

Name	Date
Marcus Woodward	24/05/2023

Authorised on behalf of the Environment Agency

Schedule 1

All conditions have been varied by the consolidated permit as a result of an Environment Agency initiated variation.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

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Conditions

1 Management

1.1 General management

1.1.1 The operator shall manage and operate the activities:

- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
- (b) using sufficient competent persons and resources.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.2 Energy efficiency

1.2.1 The operator shall:

- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
- (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
- (c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

1.3.1 The operator shall:

- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
- (b) maintain records of raw materials and water used in the activities;
- (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
- (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

1.4.1 The operator shall take appropriate measures to ensure that:

- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
- (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
- (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

2.2 The site

2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

2.3 Operating techniques

2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.

2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.

2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.

2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:

- (a) the nature of the process producing the waste;
- (b) the composition of the waste;
- (c) the handling requirements of the waste;
- (d) the hazardous property associated with the waste, if applicable; and
- (e) the waste code of the waste.

2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.4 Improvement programme

2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.

2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

3 Emissions and monitoring

3.1 Emissions to water, air or land

3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1 and 3.2

- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.
- 3.1.4 For the following activities referenced in Table S1.1 (AR3 – Boiler 1 & Boiler 2): The first monitoring measurements shall be carried out within four months of 01/01/2025 or of the date when the MCP is first put into operation, whichever is later.

3.2 Emissions of substances not controlled by emission limits

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
 - (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Odour

- 3.3.1 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.
- 3.3.2 The operator shall:
 - (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.4 Noise and vibration

- 3.4.1 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.
- 3.4.2 The operator shall:
 - (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period

specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;

- (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Monitoring

- 3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
 - (a) point source emissions specified in tables S3.1 and S3.2.
- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1 and S3.2 unless otherwise agreed in writing by the Environment Agency.

3.6 Pests

- 3.6.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.
- 3.6.2 The operator shall:
 - (a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution from pests;
 - (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

- 4.1.1 All records required to be made by this permit shall:
 - (a) be legible;
 - (b) be made as soon as reasonably practicable;
 - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
 - (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and

(ii) matters which affect the condition of the land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.

4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
- (b) the annual production/treatment data set out in schedule 4 table S4.2; and
- (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.

4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.

4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

4.3 Notifications

4.3.1 In the event:

- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
 - (i) inform the Environment Agency,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
- (b) of a breach of any permit condition the operator must immediately—
 - (i) inform the Environment Agency, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
- (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:
- Where the operator is a registered company:
- (a) any change in the operator's trading name, registered name or registered office address; and
 - (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.
- Where the operator is a corporate body other than a registered company:
- (a) any change in the operator's name or address; and
 - (b) any steps taken with a view to the dissolution of the operator.
- In any other case:
- (a) the death of any of the named operators (where the operator consists of more than one named individual);
 - (b) any change in the operator's name(s) or address(es); and
 - (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.
- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
- (a) the Environment Agency shall be notified at least 14 days before making the change; and
 - (b) the notification shall contain a description of the proposed change in operation.
- 4.3.6 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.
- 4.3.7 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:
- (a) a decision by the Secretary of State not to re-certify the agreement;
 - (b) a decision by either the operator or the Secretary of State to terminate the agreement; and
 - (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR1	Section 6.8 Part A(1) d (iii) (aa)	<p>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</p> <p>Animal and vegetable raw materials (other than milk only), both in combined and separate products, with a finished product production capacity in tonnes per day greater than—</p> <p>(aa)75 if A is equal to 10 or more,</p> <p>where 'A' is the portion of animal material in percent of weight of the finished product production capacity.</p>	<p>From receipt of raw materials through to dispatch of final product, wet-canned pet food.</p> <p>Production capacity is limited to 272 tonnes per day.</p>
AR2	Section 5.4 Part A(1) (a) (i)	Biological treatment of non-hazardous wastewater.	<p>From generation of wastewater to discharge to Clifton Brook.</p> <p>The ETP process consists of primary filtration, balancing, DAF and chemical dosing, sludge dewatering, secondary filtration, bioreactor, second sludge dewatering, MBR, discharge.</p>
Directly Associated Activity			
AR3	Steam and electrical power supply	<p>Medium Combustion plants:</p> <p>Boiler 1: 10.6 MWth</p> <p>Boiler 2: 10.6 MWth</p> <p>CHP: 1.5 MWth</p> <p>All natural gas fired</p>	From receipt of fuel to release of products of combustion to air.
AR4	Raw material storage and handling	Storage and handling of raw materials at the installation	From receipt of raw materials to dispatch of final product.
AR5	Use of refrigerants	Use of refrigerants in cooling, chilling and/or freezing systems at the installation.	From receipt of raw materials to dispatch of final product.
AR6	Storage and use of chemicals and oils	Storage and use of chemicals and oils at the installation.	From receipt of chemicals and oils to disposal of wastes arising.

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR7	Waste storage and handling	Storage and handling of waste materials	From generation of waste to storage pending removal for disposal or recovery.
AR8	Process cooling waters	Operation of three cooling towers	From operation of cooling towers, including chemical dosing.
AR9	Surface water drainage	Collection of uncontaminated site surface waters	Handling and storage of site drainage until discharge to the site surface water system.
AR10	Ice making plant	Making of ice for use in the production process	Generation of ice within the permitted installation.
AR11	Fished goods storage pre-despatch	Storage of finished goods pre-despatch	From receipt of finished goods to despatch from the permitted installation.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application BN3316IU	Responses to questions 2.1 to 2.8 given in pages 4 to 47 of the Application, and the Application Site Report.	10/09/2004
Request for further information	Addition to Table D2A of the Application Site Report.	17/02/2005
Application for variation EP3939LF	Application and drawings including Drawing No 1, Revise IPPC boundary	05/01/2006
Request for further information	Responses providing further information	21/02/2006 07/03/2006 10/03/2006
Variation application UP3137TE (EPR/ BN3316IU/V003)	The response to questions in the following parts of the application form: Part C2 – Table 1, Part C3 – Tables 1a to 5 Part C3 – sections 4 to 6 – Information on sections 5 to 16 of the supporting documents of the application.	29/07/2010
Request for further information	Response to Schedule 5 Notice served 31/08/2010.	26/09/2010 28/09/2010
Regulation 61 (1) Notice – Responses to questions dated 31/01/2022	All parts	Received 08/07/2022
Request for further information dates 23/03/2023	Information received in relation to BATcs 4, 5, 6(a), 7, 9, 11, 12, AELs to water, AELs to air, current capacity, RHS, SCR, discharge of uncontaminated surface water, updated site plan, and non-technical description of the listed activity.	06/04/2023
Additional information requested 11/04/2023	Clarifications received in relation to CHP capacity	13/04/2023

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC18	<p>The operator shall submit, for approval by Environment Agency, a report setting out progress to achieving the 'Narrative' BAT where BAT is currently not achieved, but will be achieved before 4 December 2023. The report shall include, but not be limited to, the following:</p> <ol style="list-style-type: none"> 1) Methodology for achieving BAT 2) Associated targets /timelines for reaching compliance by 4 December 2023 3) Any alterations to the initial plan (in progress reports). <p>The report shall address the BAT Conclusions for Food, Drink and Milk Industries with respect to BAT 1, 4, 6, 11, and 12.</p> <p>Refer to BAT Conclusions for a full description of the BAT requirement.</p>	04/12/2023
IC19	<p>The Operator shall undertake a survey of the site effluent treatment plant (ETP) primary, secondary and tertiary containment and review measures against relevant standard including:</p> <ul style="list-style-type: none"> • CIRIA Containment systems for the prevention of pollution (C736) – Secondary, tertiary and other measures for industrial and commercial premises, • EEMUA 159 - Above ground flat bottomed storage tanks <p>The operator shall submit a written report to the Environment Agency approval which outlines the results of the survey and the review of standard and provide details of</p> <ul style="list-style-type: none"> • current containment measures • any deficiencies identified in comparison to relevant standards, • improvements proposed • time scale for implementation of improvements. <p>The operator shall implement the proposed improvements in line with the timescales agreed by the Environment Agency.</p>	12 months from permit issue
IC20	<p>The operator shall submit, for approval by the Environment Agency, a report setting out progress to achieving the Best Available Techniques Conclusion Associated Emission Levels (BAT-AELs) where BAT is currently not achieved but will be achieved before 4 December 2023. The report shall include, but not be limited to, the following:</p> <ol style="list-style-type: none"> 1) Current performance against the BAT-AELs. 2) Methodology for reaching the BAT-AELs. 3) Associated targets /timelines for reaching compliance by 4 December 2023. 4) Any alterations to the initial plan (in progress reports). <p>The report shall address the BAT Conclusions for Food, Drink and Milk industries with respect to the following:</p> <ul style="list-style-type: none"> • BAT 12 Table 1 (compliance with BAT-AELs for direct discharges to a receiving water body) <p>Refer to BAT Conclusions for a full description of the BAT requirement.</p>	04/12/2023
IC21	<p>The operator shall produce a climate change adaptation plan. The approved plan will form part of the EMS.</p> <p>The plan shall include, but not be limited to:</p> <ul style="list-style-type: none"> • Details of how the installation has or could be affected by severe weather; • The scale of the impact of severe weather on the operations within the installation; • An action plan and timetable for any improvements to be made to minimise the impact of severe weather at the installation. 	12 months from permit issue

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	The Operator shall implement any necessary improvements to a timetable agreed in writing with the Environment Agency.	

Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
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Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1 [Point B1 on site plan in Schedule 7] through shared stack	Boiler 1 10.6 MWth Natural gas fired	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	200 mg/m ³ [Note 1]	Periodic	Annually [Note 2]	BS EN 14792 [Note 3]
		Carbon monoxide	No Limit	Periodic	Annually [Note 2]	MCERTS BS EN15058
A2 [Point B1 on site plan in Schedule 7] through shared stack	Boiler 2 10.6 MWth Natural gas fired	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	200 mg/m ³ [Note 1]	Periodic	Annually [Note 2]	BS EN 14792 [Note 3]
		Carbon monoxide	No Limit	Periodic	Annually [Note 2]	MCERTS BS EN15058
A3 [Point B1 on site plan in Schedule 7] through shared stack	CHP 1 1.5 MWth Natural gas fired	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	95 mg/m ³	Periodic	Annually	BS EN 14792 [Note 3]
		Carbon monoxide	No Limit	Periodic	Annually	MCERTS BS EN15058
A4 [Point B2 on site plan in Schedule 7] through shared stack	Maintenance workshop welding plant	No parameter set	No limit set	--	--	--
Note 1: Limits apply from 01/01/2025 Note 2: Monitoring requirements apply from 01/01/2025 Note 3: certification to the MCERTS performance standards indicates compliance with BS EN 14792						

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W2 on site plan in schedule 7	Effluent treatment plant	Total daily volume of discharge	960 m ³ /day	24-hour total	Continuous	MCERTS self-monitoring of effluent

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
emission to Clifton Brook						flow scheme
W2 on site plan in schedule 7 emission to Clifton Brook	Effluent Treatment Plant	Biological oxygen demand (BOD)	10 mg/l	24-hour proportional flow	Monthly	EN 1899-1
W2 on site plan in schedule 7 emission to Clifton Brook	Effluent Treatment Plant	Ammoniacal nitrogen (expressed as N)	5 mg/l	24-hour proportional flow	Monthly	BS EN ISO 11732:1997
W2 on site plan in schedule 7 emission to Clifton Brook	Effluent Treatment Plant	pH	6 – 9	24-hour proportional flow	Monthly	BS 6068-2.50
W2 on site plan in schedule 7 emission to Clifton Brook	Effluent Treatment Plant	Chemical oxygen demand (COD) ^{Note1}	From 04/12/2023 100 mg/l	24-hour proportional flow	Daily	--
W2 on site plan in schedule 7 emission to Clifton Brook	Effluent Treatment plant	Total suspended solids (TSS)	15mg/l	24-hour proportional flow	Daily	BS EN 872
W2 on site plan in schedule 7 emission to Clifton Brook	Effluent Treatment Plant	Total nitrogen (TN)	From 04/12/2023 20 mg/l	24-hour proportional flow	Daily	EN 12260, EN ISO 11905-1.
W2 on site plan in schedule 7 emission to Clifton Brook	Effluent Treatment Plant	Total phosphorus (TP)	From 04/12/2023 2 mg/l	24-hour proportional flow	Daily	EN ISO 6878, EN ISO 15681-1 and -2, ENISO 11885.
W3 not shown on site plan in schedule 7 emission to Clifton Brook	Uncontaminated surface water via interceptor to reed bed	No parameters set	No limit set	--	--	--

Note 1: TOC and COD are alternatives. TOC is the preferred option because it does not rely upon the use of very toxic chemicals.

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Point source emissions to air Parameters as required by condition 3.5.1	MCPs plant A1 – Boiler 1 A2 – Boiler 2 A3 – CHP 1	Annually.	1 January
Point source emissions to water (other than sewer) Parameters as required by condition 3.5.1	W2	Quarterly	1 January, 1 April, 1 July & 1 October

Table S4.2: Annual production/treatment	
Parameter	Units
Pet food	tonnes

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	m ³
Energy usage	Annually	MWh
Waste	Annually	tonnes
COD efficiency	Annually*	COD te/te product
*COD efficiency to be calculated on a weekly frequency, reported annually		

Table S4.4 Reporting forms		
Parameter	Reporting form	Form version number and date
Point source emissions to air	Emissions to Air Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Point source emissions to water (other than sewer)	Emissions to Water Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Water usage	Water Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Energy usage	Energy Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Food waste	Food waste Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1 06/02/2023

Table S4.4 Reporting forms		
Parameter	Reporting form	Form version number and date
Other performance parameters	Other Performance Parameters Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021

Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the breach of permit conditions not related to limits	
To be notified within 24 hours of detection	
Condition breached	
Date, time and duration of breach	
Details of the permit breach i.e. what happened including impacts observed.	
Measures taken, or intended to be taken, to restore permit compliance.	

(d) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“Medium Combustion Plant” or “MCP” means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW. An “existing medium combustion plant” is combustion plant operating before 20 December 2018.

“Medium Combustion Plant Directive” or “MCPD” means Directive 2015/2193/EU of the European Parliament and of the Council on the limitation of emissions of certain pollutants into the air from medium combustion plants, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“Pests” means Birds, Vermin and Insects.

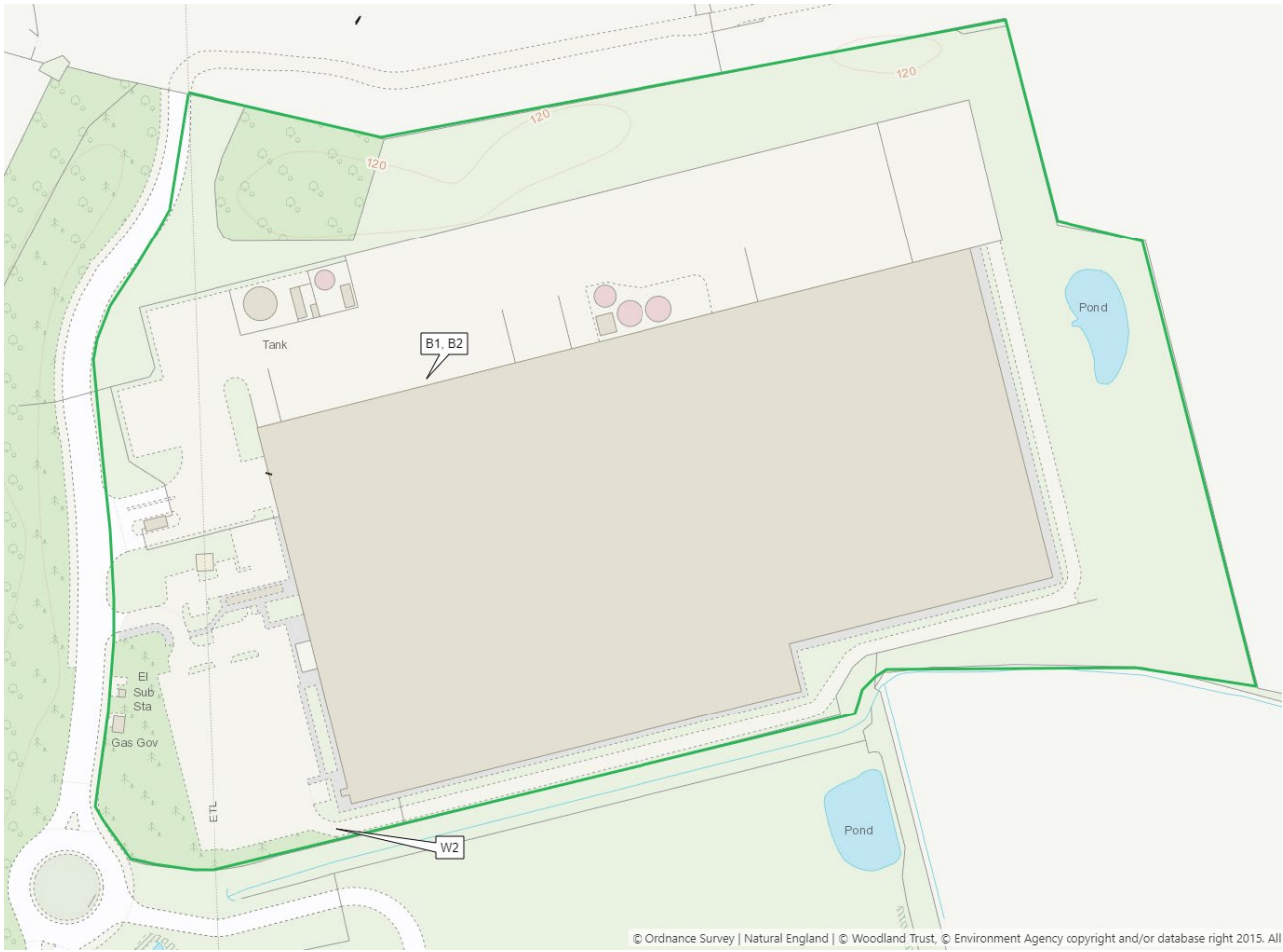
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels other than gas engines or gas turbines, 6% dry for solid fuels; and/or
- in relation to emissions from gas engines or gas turbines, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 15% dry for liquid and gaseous fuels ; and/or
- in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content

“year” means calendar year ending 31 December.

Schedule 7 – Site plan



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END OF PERMIT