

# Notice of variation and consolidation with introductory note

**The Environmental Permitting (England & Wales) Regulations 2016**

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Nestle Purina UK Manufacturing Operations Limited

Southbrink Factory  
Cromwell Road  
Wisbech  
Cambridgeshire  
PE13 2RG

**Variation application number**

EPR/BT3714IY/V013

**Permit number**

EPR/BT3714IY

# Southbrink Factory

## Permit number EPR/BT3714IY

### 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 4<sup>th</sup> December 2019 in the official journal of the European Union.

The schedules specify the changes made to the permit.

The Southbrink Factory produces and packages moist meat cat and dog food into 85g and 100g pouches. The pet food is made primarily from category 3 animal by-products (materials not intended for human consumption) mixed with other raw materials to form to a dough which is then shaped before cutting into meat pieces. The dough is transferred to one of three different technology streams depending on the final product:

- Grill – The dough is pumped into the grill process and the resultant cooked meat pieces are then chopped.
- HPP – The dough is pumped to the siefer, where colour can be added if required, and then through the grill plate which creates a meaty flaked texture. The cooked material is then chopped.
- Tunnel – The dough is pumped to the tunnel machine via the colour skid where colour can be added as required. The dough is then pushed out into ribbons where it is cooked in the steam tunnel before being chopped at the exit point.

The meat chunks are then mixed with gravy or jelly before being filled into the pouch and sealed. The sealed pouches are then sterilised and cooked in a high pressure enclosed retort before being packed into reusable boxes that are then shipped to a third-party packer for packing into the outer packaging as purchased. A very small amount is packed direct into cardboard boxes for direct shipping to the customer.

The site operates 24 hours a day 7 days a week. The daily processing capacity is 622 tonnes a day.

The Environmental Permit is for the main listed activity falling under Section 6.8 Part A1 (d)(iii)(aa)

*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 (where the weight of the finished product excludes packaging)—*

*(iii) 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*

*(aa) 75 if A is equal to 10 or more*

where 'A' is the portion of animal material in percent of weight of the finished product production capacity.

The main emissions to air are from the four on site boilers all operated on Natural Gas, boilers 1, 2 & 3 all have a thermal input of 5.6 MWth. Boiler 4 has a thermal input of 8.7 MWth. The boilers are considered to be existing under the Medium Combustion Directive (MCPD). The limits and monitoring requirements for the boilers have been retained since the original permit was issued.

Process effluent is treated within the sites effluent treatment plant prior to discharge the foul sewer (S1) under consent from the sewage undertaker. Uncontaminated surface water originating from the roofs of the site and uncontaminated areas run into a culvert (W1) that runs under the site. The culvert forms part of the Middle Level drainage system.

The installation covers an area of approximately 23.7 acres (9.6 hectares) and is centred on National Grid Reference TF 457880 9320. The installation is situated within the town of Wisbech on the B198 South Brink Road, which forms a link from the town centre to the A47. The city of Peterborough is approximately 29Km to the southwest of the installation. The site has housing on the immediate site boundary to the east and northeast and within 200m on the western and northern boundary.

The Nene Washes which is designated as a Special Area of Conservation (SAC). Special Protection Area (SPA) and a Ramsar site is located within 10km of the installation boundary. There are no Sites of Special Scientific Interest (SSSI) within 2km of the site boundary but there is a single Local Wildlife Site (River Nene) within 2km of the installation boundary.

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

<b>Status log of the permit</b>		
Description	Date	Comments
Application BT3714IY	Duly made 27/08/2004	Application for a new installation.
Additional information received in response to request dated 05/01/2005	04/02/2005	
Additional information received in response to request dated 11/01/2005	03/06/2005	
Request to extend determination dated 01/02/2005	04/02/2005	Request accepted
Permit determined EPR/BT3714IY	27/07/2005	Original permit under Section 6.8 A(1)(d)(i) issued to Nestle Purina Petcare (U.K.) Limited.
Application BT3714IY/V002 (Variation & consolidation)	13/03/2006	Variation for the addition of grill 2, installation of an enclosure around grill 1 and installation of two 30 tonne flour silos.
Additional information received	18/04/2006	
Variation determined EPR/BT3714IY	05/05/2006	Varied permit issued
Application BT3714IY/V003 (variation)	02/02/2009	
Request to extend determination	21/05/2009	
Variation determined	15/07/2009	
Application EPR/BT3714IY/V004 (Variation)	Duly made 25/06/2010	Variation for the addition of a pouch line within the canning production unit, installation of a new modular biofilter system and installation of palletising equipment.
Variation determined EPR/BT3714IY	03/11/2010	Varied permit issued
Variation EPR/BT3714IY/V005 raised at pre-application stage and withdrawn	03/11/2010	

Application EPR/BT3714IY/V006 (Variation)	Duly made 04/07/2011	Variation to introduce second pouch production line within the canning production unit.
Variation determined EPR/BT3714IY	01/08/2011	Varied permit issued
Agency variation determined EPR/BT3714IY/V007	09/08/2013	Agency variation to implement the changes introduced by IED.
Application EPR/BT3714IY/V008 (Variation & consolidation)	Duly made 17/12/2013	Variation to install an additional grill plate line disconnect a unit steaming tunnel and implement the changes introduced by IED
Variation determined EPR/BT3714IY	17/03/2014	Varied and consolidated permit issued.
Application EPR/BT3714IY/V009 (Variation)	Duly made 22/07/2015	Variation to add enclosed odour abatement system to Grill Tube Line 1 and remove existing housing structure
Variation determined EPR/BT3714IY	29/09/2015	Varied permit issued
Application EPR/BT3714IY/V010 (Variation)	Duly Made 23/12/2015	Application to vary the permit to install an enclosed pneumatic product transfer system (Grill Tube 2 Chunkfly) and remove the existing open conveyor system.
Variation determined EPR/BT3714IY/V010	17/03/2016	Varied permit issued
Application EPR/BT3714IY/V011 (Variation and consolidation)	Duly made 28/09/2017	Application to replace grill plate tube with new like for like technology and to update the permit to modern conditions.
Variation determined EPR/BT3714IY	02/11/2017	Varied and consolidated permit issued.
Notified of change of Company Name	31/01/2020	Name changed to Nestle Purina UK Manufacturing Operations Limited
Variation issued EPR/BT3714IY/V012	07/02/2020	Varied permit issued to Nestle Purina UK Manufacturing Operations Limited
Application EPR/BT3714IY/V013 (variation and consolidation)	Regulation 61 Notice response received 30/11/2021	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.
Request for Further Information dated 25/01/2022	25/03/2022	Further information provided regarding the following BATc 1, 6, 8, 9, 11 & 14
Request for Further Information dated 08/03/2023	28/04/2023	Further information provided regarding the following, use of standby fuel, BATc 6, BATc 9, EPL for water use and onsite containment.
Variation determined and consolidation issued EPR/BT3714IY (Billing ref. AP3341QT).	20/06/2023	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/BT3714IY

### Issued to

**Nestle Purina UK Manufacturing Operations Limited** (“the operator”)

whose registered office is

**1 City Place  
Beehive Ring Road  
Gatwick  
RH6 0PA**

company registration number 00121700

to operate a regulated facility at

**Southbrink Factory  
Cromwell Road  
Wisbech  
Cambridgeshire  
PE13 2RG**

to the extent set out in the schedules.

The notice shall take effect from 20/06/2023

Name	Date
Rebecca Brough	20/06/2023

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.

# Permit

## The Environmental Permitting (England and Wales) Regulations 2016

### Permit number

**EPR/BT3714IY**

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/BT3714IY/V013 authorising,

**Nestle Purina UK Manufacturing Operations Limited** (“the operator”),

whose registered office is

**1 City Place  
Beehive Ring Road  
Gatwick  
RH6 0PA**

company registration number 00121700

to operate an installation at

**Southbrink Factory  
Cromwell Road  
Wisbech  
Cambridgeshire  
PE13 2RG**

to the extent authorised by and subject to the conditions of this permit.

<b>Name</b>	<b>Date</b>
<b>Rebecca Brough</b>	<b>20/06/2023</b>

Authorised on behalf of the Environment Agency

# 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, S3.2 and S3.3.
- 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.

### **3.2 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, S3.2 and S3.3; and
  - (b) process monitoring specified in table S3.4.
- 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, S3.2 and S3.3 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

<b>Table S1.1 activities</b>			
<b>Activity reference</b>	<b>Activity listed in Schedule 1 of the EP Regulations</b>	<b>Description of specified activity</b>	<b>Limits of specified activity</b>
AR1	Section 6.8 Part A1 (d) (iii) (aa)	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 (where the weight of the finished product excludes packaging)— (iii) 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 (aa) 75 if A is equal to 10 or more where 'A' is the portion of animal material in percent of weight of the finished product production capacity.	Manufacturing of pet food, from the receipt of raw materials (including raw meat) to the storage, handling and sterilising/cooking of sealed product through to despatch of finished product and wastes produced by the process  Production capacity is limited to 622 tonnes per day.
AR2	Section 5.4 Part A1 (a) (ii)	Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving Physico-chemical Treatment	From generation of wastewater to treatment including dissolved air filtration and settled sludge storage through to discharge to discharge to Anglian Water sewer.
<b>Directly Associated Activity</b>			
AR3	Steam and electrical power supply	Medium Combustion plants 4 x natural gas fired boilers: Boiler 1: 5.6 MWth Boiler 2: 5.6 MWth Boiler 3: 5.6 MWth Boiler 4: 8.7 MWth	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.

<b>Table S1.1 activities</b>			
<b>Activity reference</b>	<b>Activity listed in Schedule 1 of the EP Regulations</b>	<b>Description of specified activity</b>	<b>Limits of specified activity</b>
AR7	Waste storage and handling	Storage and handling of waste materials	From generation of waste to storage pending removal for disposal or recovery.
AR8	Surface water drainage	Collection of uncontaminated site surface waters	Handling and storage of site drainage until discharge to the site surface water system.

<b>Table S1.2 Operating techniques</b>		
<b>Description</b>	<b>Parts</b>	<b>Date Received</b>
Application BT3714IY	The response to questions 2.1 and 2.2 of the application (excluding sections 2.2.58 to 2.2.60 inclusive), and letter dated 04/02/05, and response to Schedule 4 Notice dated June 2005	27/08/2004
		04/02/2005
		03/06/2005
Variation application CP3538LQ	The response to questions 2.1 and 2.2 given in the variation application and letter dated 18 April 2006	13/03/2006
Variation application NP3734GB	The response to questions 2.1 and 2.2 of the variation application.	02/02/2009
Variation application EPR/BT3714IY/V004	The response to questions 2a, 2b, 2d, 2e Letter dated 15/10/10 regarding odour control of Effluent Treatment plant	04/05/2010
		15/10/2020
Variation application EPR/BT3714IY/V006	The operating techniques described in the application for variation	04/07/2011
Variation application EPR/BT3714IY/V008	The operating techniques: Document Ref: 13514540014/5/V.0	17/12/2013
Variation application EPR/BT3714IY/V009	The response to questions in Section 3, form EPC – Part C3 and covering letter of the application paperwork.	16/07/2015
Variation application EPR/BT3714IY/V010	The response to question 3 of the Part C3 of the application form given in covering letter REF: EPWISMTC20152 dated 7 <sup>th</sup> December 2015 and associated appendix.	07/12/2015
Variation application EPR/BT3714IY/V011	The response to question 3, Part C3 of the application forms and document prepared by Golder Associates dated 25/09/2017 'Nestlé Purina Petcare Wisbech – Notification of proposed Minor Technical Change – HPP2 Grill Plate Project' Project Number: 1783421.601/A.0.	26/09/2017
Regulation 61 (1) Notice – Responses to questions dated 30/07/2021	All parts	Received 30/11/2021
Request for further information dated 25/01/2022	Further information provided regarding the following BATc 1, 6, 8, 9, 11 & 14	25/03/2022
Request for further information dated 08/03/2023	Further information provided regarding the following, use of standby fuel, BATc 6, BATc 9, EPL for water use and onsite containment.	28/04/2023

<b>Table S1.3 Improvement programme requirements</b>		
<b>Reference</b>	<b>Requirement</b>	<b>Date</b>
IC12	<p>The operator shall use refrigerants without ozone depletion potential and with a low global warming potential (GWP) in accordance with BAT 9 from the Food, Drink and Milk Industries BATCs.</p> <p>To demonstrate compliance against BAT 9, the operator shall develop a replacement plan for the refrigerant system(s) at the installation. This shall be incorporated within the existing environmental management system by the specified date.</p> <p>The plan should include, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>• Where practicable, retro filling systems containing high GWP refrigerants with lower GWP alternatives as soon as possible.</li> <li>• An action log with timescales, for replacement of end-of-life equipment using refrigerants with the lowest practicable GWP.</li> </ul>	04/12/2023
IC13	<p>The operator shall produce a monitoring plan detailing how the management of relevant hazardous substances which did not screen out as low risk, based on the RHS baseline assessment, will be maintained and monitored to mitigate the risks of pollution. The plan shall be submitted for approval including timescales to undertake any infrastructure improvements.</p> <p>The plan shall be implemented in accordance with the Environment Agency's written approval.</p>	20/06/2024 or other date as agreed in writing with the Environment Agency
IC14	<p>The operator shall produce a climate change adaptation plan. The approved plan will form part of the EMS. The plan shall include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• Details of how the installation has or could be affected by severe weather;</li> <li>• The scale of the impact of severe weather on the operations within the installation;</li> <li>• An action plan and timetable for any improvements to be made to minimise the impact of severe weather at the installation.</li> </ul> <p>The Operator shall implement any necessary improvements to a timetable agreed in writing with the Environment Agency.</p>	20/06/2024 or other date as agreed in writing with the Environment Agency



## Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials	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 A1 on site plan in Schedule 7]	Boiler 1 5.6MWth fired on Natural gas	Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>x</sub> )	140 mg/m <sup>3</sup>	Periodic	Annual	BS EN 14792 [Note 1]
		Carbon monoxide	No Limit	Periodic	Annual	MCERTS BS EN15058
A2 [Point A2 on site plan in Schedule 7]	Boiler 2 5.6MWth fired on Natural gas	Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>x</sub> )	140 mg/m <sup>3</sup>	Periodic	Annual	BS EN 14792 [Note 1]
		Carbon monoxide	No Limit	Periodic	Annual	MCERTS BS EN15058
A3 [Point A3 on site plan in Schedule 7]	Boiler 3 5.6MWth fired on Natural gas	Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>x</sub> )	140 mg/m <sup>3</sup>	Periodic	Annual	BS EN 14792 [Note 1]
		Carbon monoxide	No Limit	Periodic	Annual	MCERTS BS EN15058
A4[Point A4 on site plan in Schedule 7]	Boiler 4 8.11 MWth fired on natura gas	Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>x</sub> )	140 mg/m <sup>3</sup>	Periodic	Annual	BS EN 14792 [Note 1]
		Carbon monoxide	No Limit	Periodic	Annual	MCERTS BS EN15058
A5 [Point A5 on site plan in Schedule 7]	P4 Biofilter Discharge	Odour	No limit	--	--	--
A6 [Point A6 on site plan in Schedule 7]	Pouch 3 Biofilter	Odour	No limit	--	--	--
A7 [Point A7 on site plan in Schedule 7]	Pouch 1 Biofilter	Odour	No limit	--	--	--
A8 [Point A8 on site plan in Schedule 7]	Pouch 2 Biofilter	Odour	No limit	--	--	--

<b>Table S3.1 Point source emissions to air – emission limits and monitoring requirements</b>						
<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (including unit)</b>	<b>Reference period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
A9 [Point A9 on site plan in Schedule 7]	ETP Air Extraction UV / Carbon Filter	Odour	No limit	--	--	--
A10 [Point A10 on site plan in Schedule 7]	ETP Air Extraction UV / Carbon Filter	Odour	No limit	--	--	--
A11 [Point A11 on site plan in Schedule 7]	Flour and Gluten Silos (P1 & P2 Silos)	Dust	No limit	--	--	--
A12 [Point A12 on site plan in Schedule 7]	Flour and Gluten Silos (P4 Silo)	Dust	No limit	--	--	--

Note 1: certification to the MCERTS performance standards indicates compliance with BS EN 14792

<b>Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements</b>						
<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (incl. unit)</b>	<b>Reference Period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
W1 [Point W1 on site plan in schedule 7] emission to Middle Level Drainage system at Oldfield Lane.	Uncontaminated surface runoff	No parameter set	No limit set	--	--	--

<b>Table S3.3 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements</b>						
<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (incl. Unit)</b>	<b>Reference period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
S1 [Point S1 on site plan in schedule 7] emission to Anglian Water foul sewer	Treated process effluent from onsite effluent treatment plant	No parameters Set	No limit set	--	--	--

<b>Table S3.4 Process monitoring requirements</b>				
<b>Emission point reference or source or description of point of measurement</b>	<b>Parameter</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>	<b>Other specifications</b>
A5, A6, A7, A8	Air Flow from Biofilters serving P1&2, P3 and P4	Continuous	-	-
A5, A6, A7, A8	Pressure Drop from Biofilters serving P1&2, P3 and P4	Continuous	-	-
A5, A6, A7, A8	pH (drain fluid) from Biofilters serving P1&2, P3 and P4	Continuous	-	-
A5, A6, A7, A8	Temperature from Biofilters serving P1&2, P3 and P4	Continuous	-	-
A5, A6, A7, A8	Condition of biomass from Biofilters serving P1&2, P3 and P4	Annual	-	-
A9	Condition of carbon in carbon filter serving the effluent treatment plant	Annual	-	-
A5, A6, A7, A8, A9	Olfactory assessment (Odour units) from Biofilters serving P1&2, P3 and P4, UV abatement plant and carbon filter discharge serving the effluent treatment plant	Annual	BS EN 13725	-

## Schedule 4 – Reporting

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

Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Point source emissions to air Parameters as required by condition 3.5.1	A1, A2, A3, and A4,	Every 12 months	1 January
Point source emissions to sewer Parameters as required by condition 3.5.1	S1	Every 12 months	1 January
Process monitoring - Odour abatement performance Parameters as required by condition 3.5.1	As specified in schedule 3 table S3.4	Every 12 months	1 January

Parameter	Units
Production of Pouched Petfood	Tonnes

Parameter	Frequency of assessment	Units
Water usage	Annually	m <sup>3</sup>
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

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
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
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	

<b>(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</b>	
<b>To be notified within 24 hours of detection</b>	
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>(b) Notification requirements for the breach of a limit</b>	
<b>To be notified within 24 hours of detection unless otherwise specified below</b>	
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	

<b>Time periods for notification following detection of a breach of a limit</b>	
<b>Parameter</b>	<b>Notification period</b>

<b>(c) Notification requirements for the breach of permit conditions not related to limits</b>	
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.	

<b>(d) Notification requirements for the detection of any significant adverse environmental effect</b>	
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.

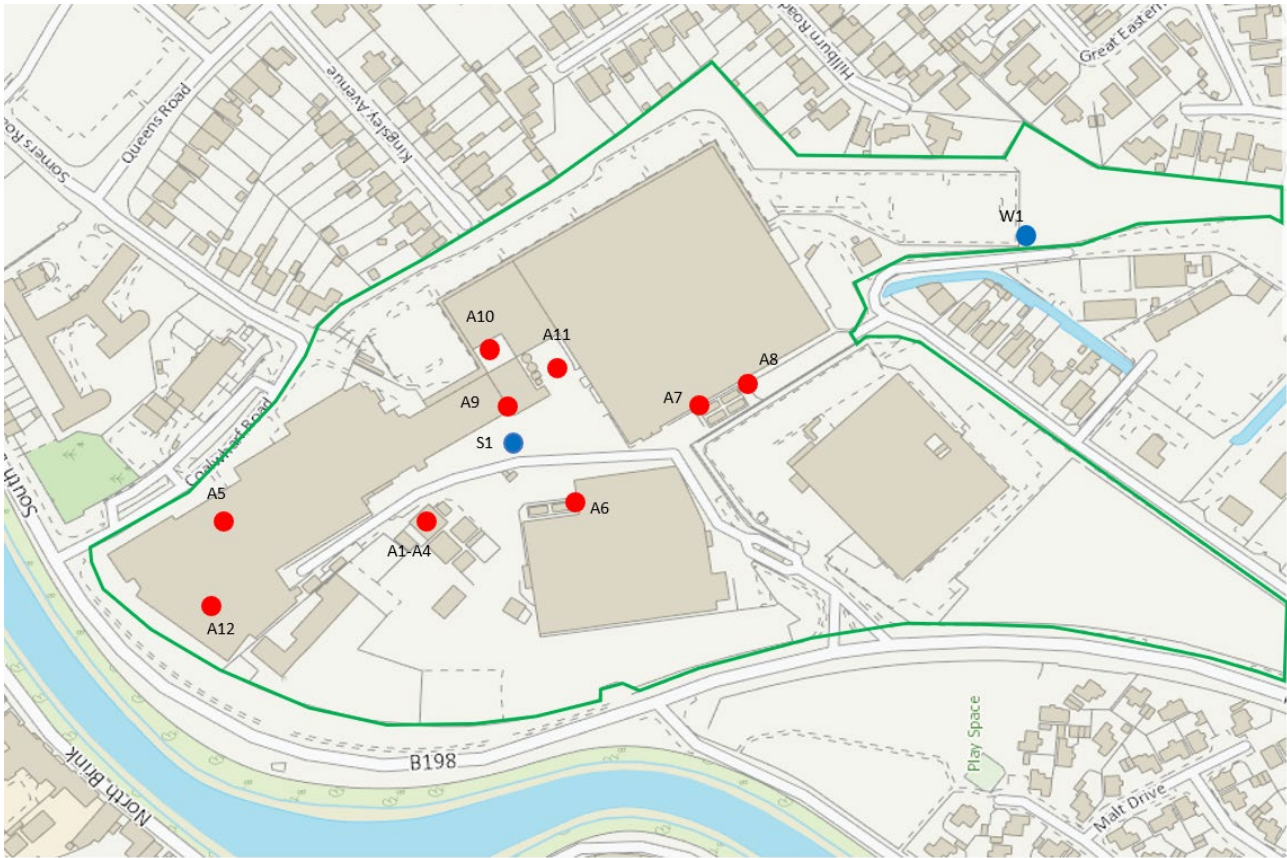
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

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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