

# Notice of variation and consolidation with introductory note

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

---

Nestle Purina UK Manufacturing Operations Limited

Chilton Site  
Windham Road  
Chilton Industrial Estate  
Sudbury  
Suffolk  
CO10 2XD

### **Variation application number**

EPR/TP3932PV/V007

### **Permit number**

EPR/TP3932PV

# Chilton Site

## Permit number EPR/TP3932PV

### 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.

We have implemented the requirements of the Medium Combustion Plant directive and incorporated post-dated requirements for 2030.

The schedules specify the changes made to the permit.

Nestle Purina Petcare (U.K.) Limited operate an installation where the primary activity is the manufacture of a range of dry and semi-moist meat based pet food. The process involves the following steps:

- acceptance, storage and handling of raw materials;
- processing, which includes batching and mixing;
- grinding and extrusion;
- coating and
- cooling and packaging

Directly associated activities include the operation of an on-site effluent treatment plant and use of two natural gas fired boilers to produce steam and hot water.

Potential emissions to air, from the processes, are oxides of nitrogen, carbon monoxide and particulates. These have been assessed and no releases are regarded as significant.

All effluent passes through the effluent treatment plant on site prior to being discharged to the River Stour via Bures Road Sewage Treatment Plant, which is operated by Anglian Water.

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>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Application received TP3932PV	Received 02/09/2004	Application for an Environmental Permit.
Response to request for information	Request dated 24/01/2005	04/03/2005, 14/03/2005 and 18/03/2005
Request to extend determination	Request dated 14/01/2005, 05/04/2005	15/02/2005, 19/04/2005
Permit determined	19/04/2005	Permit issued.

Variation application EPR/TP3932PV/V002	Duly made 19/12/2006	Application to vary the permit.
Variation determined EPR/TP3932PV	18/07/2007	Varied permit issued.
Variation application EPR/TP3932PV/V003	Received 13/05/2013	Application not duly made and returned on 21/06/2013 after withdrawal request from the operator.
Variation application EPR/TP3932PV/V004	Duly made 12/11/2013	Application to vary and consolidated the permit.
Variation determined EPR/TP3932PV	13/01/2014	Varied and consolidated permit issued.
Variation application EPR/TP3932PV/V005	Duly made 18/06/2018	Application to vary the permit following significant changes to odour control measures.
Additional information received in response to Schedule 5 Notice, dated 02/10/2018	Received 27/11/2019	Additional information relating to the proposed odour abatement.
Additional information received in response to Schedule 5 Notice, dated 14/01/2019	21/01/2019	Additional information relating to line 7 odour abatement and updated site plan showing the installation boundary.
Additional information received	04/03/2019	Updated site plan showing correct emission point references.
Additional information received	29/03/2019	Updated site plan showing revised installation boundary and tank relocation details.
Additional information received	02/04/2019	Confirmation of bunding and containment capacity.
Draft decision EPR/TP3932PV/V005	05/04/2019	Consultation 05/04/2019 to 08/05/2019.
Variation determined EPR/TP3932PV	09/05/2019	Varied permit issued to Nestle Purina Petcare (U.K.) Limited.
Variation Application EPR/TP3932PV/V006 Notified of change of Company name	04/03/2020	Company name changed from Nestle Purina Petcare (U.K.) Limited to Nestle Purina UK Manufacturing Operations Limited
Variation issued EPR/TP3932PV	07/05/2020	Varied permit issued to Nestle Purina UK Manufacturing Operations Limited
Application EPR/TP3932PV/V007 (variation and consolidation)	Regulation 61 Notice response received 24/05/2022	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.
Additional information received in response to request dated 19/05/2023	22/05/2023	Boiler replacement
Additional information received in response to request for information dated 10/05/2023	11/07/2023	Information provided regarding production capacity, BATc 3, 5, 6, 7, 8, 9, 11, 14, 17, energy consumption
Variation determined and consolidation issued EPR/TP3932PV	13/10/2023	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/TP3932PV

### 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

**Chilton Site  
Windham Road  
Chilton Industrial Estate  
Sudbury  
Suffolk  
CO10 2XD**

to the extent set out in the schedules.

The notice shall take effect from 13/10/2023.

Name	Date
Rebecca Brough	13/10/2023

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/TP3932PV**

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/TP3932PV/V007 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

**Chilton Site  
Windham Road  
Chilton Industrial Estate  
Sudbury  
Suffolk  
CO10 2XD**

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

<b>Name</b>	<b>Date</b>
<b>Rebecca Brough</b>	<b>13/10/2023</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 and S3.2
- 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 schedule 1, table S1.1, (AR3 Boiler 2) the first monitoring measurements shall be carried out within four months of 01/01/2030 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.

### **3.4 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
  - (b) process monitoring specified in table S3.3
- 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

<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 A(1) (d) (i): Treatment and processing materials intended for the production of food products from animal raw materials (other than milk only) with a finished product production capacity greater than 75 tonnes per day	Production of dry and semi-moist pet food including batching, mixing, grinding, extrusion, coating and cooling.	From receipt of raw materials through to dispatch of final product. Production capacity is limited to 280,000 tonnes per year.
<b>Directly Associated Activity</b>			
AR2	Effluent treatment	Treatment of non-hazardous waste waters by dissolved air flotation/pH adjustment.	From generation of waste water to discharge to foul sewer
AR3	Steam supply	Medium Combustion plants: 1 x 4.4 MWth steam raising boiler fired on natural gas (Boiler 1) 1 x 3.2 MWth steam raising boiler fired on natural gas (Boiler 2)	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.
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	The response to questions 2.1 and 2.2 given in pages/sections B2 of the application and the information submitted as further information on 04/03/2005	02/09/2004

<b>Table S1.2 Operating techniques</b>		
<b>Description</b>	<b>Parts</b>	<b>Date Received</b>
	<p>Excluding the following sections:</p> <ul style="list-style-type: none"> <li>• Section B2.3 and all references to emissions to air when main scrubber bypassed;</li> <li>• Section B2.2 Point Source Emissions to Air including B2.2.1, B2.2.2, B2.2.3, B2.2.5, B2.2.7, B2.2.13, B2.2.15, B2.2.19, B2.2.20;</li> <li>• Section B2.2 Point Source Emissions to Surface Water and Sewer including sections B2.2.22, B2.2.23; and</li> <li>• Section B2.2 Odour including section B2.2.58 and B2.2.59.</li> </ul>	
Application for variation EPR/TP3932PV/V004	<p>Sections 1.1 “Non-Technical Summary”, 1.5 “Administrative Changes”, and 2.0 “Site Emissions” of the Variation Supporting Information Report (ref. 12514540721.504/A.0) Sections 5, 6 and 7 of “Odour Management Plan” (ref. 12514540721.500/A.2)</p> <p>Excluding the following sections:</p> <ul style="list-style-type: none"> <li>• Section 1.1 Non-Technical Summary;</li> <li>• Section 2.1 Proposed Changes – Emissions to Air;</li> <li>• Section 2.4.2 Monitoring – Odour from Point Source Emissions to Air; and</li> <li>• Appendix C Site Odour Management Plan.</li> </ul>	Duly made 12/11/2013
Application for variation EPR/TP3932PV/V005	<p>Responses to Part C2 and C3 of the application forms and referenced supporting documentation.</p> <p>Excluding the following:</p> <ul style="list-style-type: none"> <li>• Appendix F - Odour Management Plan, June 2018 (reference 1772447.604.A0); and</li> <li>• Appendix C – Abatement Plant Specifications</li> </ul>	Duly made 18/06/2018
Response to Schedule 5 Notice, dated 02/10/2018	<p>Responses to questions 1 to 47 of the Schedule 5 Notice and referenced supporting documentation including:</p> <ul style="list-style-type: none"> <li>• Attachment 1 – BAT Assessment - Odour Abatement BAT Assessment – November 2018 Update, November 2018 (reference 1772447.501/A.1B.0)</li> <li>• Attachment 2 – Design Basis and Process Flow Diagram for Each System, including: <ul style="list-style-type: none"> <li>○ Process Line 7 Scrubber, Design Basis, AP4850A/DB01, T2, 26 October 2018</li> <li>○ SCB5 Scrubber, Design Basis, AP4825/DB01, T2, 26 October 2018</li> <li>○ SCB Main Scrubber, Design Basis, AP4383C/DB01, T2, 26 October 2018</li> </ul> </li> <li>• Attachment 3 – Updated Odour Management Plan, November 2018 (reference 1772447.604/A.1)</li> <li>• Appendix C – Abatement Plant Specifications</li> </ul>	27/11/2018
Response to Schedule 5 Notice date, 14/01/2019	<p>Responses to questions 1 to 3 of the Schedule 5 Notice providing the following:</p> <ul style="list-style-type: none"> <li>• clarification on the proposed line 7 calculations for humidity, temperature and media life expectancy;</li> <li>• regenerated carbon media specification from supplier;</li> </ul>	21/01/2019

Table S1.2 Operating techniques		
Description	Parts	Date Received
	<ul style="list-style-type: none"> <li>confirmation ensure this specification of media to be used as a minimum; and</li> <li>updated site plan showing installation boundary.</li> </ul>	
Additional information received	Updated site plan showing correct emission point references.	04/03/2019
Additional information received	Updated site plan showing revised installation boundary and tank relocation details.	29/03/2019
Additional information received	Confirmation of bunding and containment capacity.	02/04/2019
Regulation 61 (1) Notice – Responses to questions dated 31/01/2022	All parts	Received 24/05/2022
Regulation 61(1) Notice – request for further information dated 10/05/2023	Confirmation there has been no change to hazardous substance risk assessment included within the SPMP.	11/07/2023

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC14	<p>The Operator shall submit a written report on the commissioning of the additional odour abatement. The report shall compare the environmental performance of the abatement, as installed against the design parameters set out in the application. This should include but not be limited to:</p> <ul style="list-style-type: none"> <li>odour emission levels (based upon olfactometry and total volatile organic compound (VOC) monitoring); and</li> <li>the bedlife of the carbon media based on the performance curve and demonstration that the changes are of adequate frequency.</li> </ul> <p>In the event the report shows that the abatement is performing to different standards, than those set out in the application, the Operator shall outline the details of the differences and if the changes will have any impact on the conclusions presented within the odour impact assessment reference <i>'Sudbury Odour Impact Assessment, Odour Dispersion Modelling – Proposed Changes, 1772447.603/B.0'</i>.</p> <p>If it shown to result in a potential increase in environmental impact, the Operator shall carry out a further investigation and where appropriate propose further mitigation to ensure this shall not result in unreasonable off-site pollution. In this instance a detailed monitoring program shall be completed to identify the specific substances/substance groups that could cause an impact, including, but not limited to, gas chromatography spectrometry (GCMS) analysis.</p>	31/10/2023
IC16	<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"> <li>1) Methodology for achieving BAT</li> <li>2) Associated targets /timelines for reaching compliance by 4 December 2023.</li> <li>3) Associated targets/timelines, if applicable, for reaching compliance by 4 December 2023.</li> </ol>	04/12/2023

<b>Table S1.3 Improvement programme requirements</b>		
<b>Reference</b>	<b>Requirement</b>	<b>Date</b>
	The report shall address the BAT Conclusions for Food, Drink and Milk Industries with respect to BAT 3, 5, 6, 11 and 17. Refer to BAT Conclusions for a full description of the BAT requirement.	
IC17	The Operator shall submit a written report to the Environment Agency of monitoring carried out to determine the size distribution of particulate matter in the exhaust gas emissions to air from emission point [A3, A4 and A5], identifying the fractions within the PM10 and PM2.5 ranges. The monitoring shall be carried out under representative operating conditions and shall be in accordance with EN ISO 23210 unless otherwise agreed with the Environment Agency.	12 months from permit issue
IC18	The operator shall submit, for approval by the Environment Agency, a report setting out progress to achieving the Environmental Performance Levels (EPLs) for specific energy consumption, where the EPL is not currently achieved. The report shall include, but not be limited to, the following: 1) Methodology for achieving EPL in accordance with general techniques given in section 1.3 of the BAT conclusions 2) Associated targets /timelines for reaching compliance by 4 December 2023, or any other date as agreed in writing by the Environment Agency. The report shall address the BAT Conclusions for Food, Drink and Milk Industries with respect to sections 1.3 and 2.1 of the BAT conclusions. Refer to BAT Conclusions for a full description of the requirements.	04/12/2023
IC19	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.  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.  The plan should include, but not be limited to, the following: • Where practicable, retro filling systems containing high GWP refrigerants e.g. R-404A with lower GWP alternatives as soon as possible. • An action log with timescales, for replacement of end-of-life equipment using refrigerants with the lowest practicable GWP.	04/12/2023
IC20	The Operator shall undertake a survey of the primary, secondary and tertiary containment at the site and review measures against relevant standard including: • 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 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 • current containment measures • any deficiencies identified in comparison to relevant standards, • improvements proposed • time scale for implementation of improvements. The operator shall implement the proposed improvements in line with the timescales agreed by the Environment Agency.	12 Months from permit issue
IC21	The operator shall review and update the H1 risk assessment for particulate emissions to air at the capacity levels stated within table S1.1 of this permit. The H1 shall be submitted to the Environment Agency for review.	6 Months from permit issue



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

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
-	-

## 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 Plant 1. 4.4 MWth New medium combustion plant fuelled on natural gas	Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> )	100 mg/m <sup>3</sup>	Periodic	Every three years	BS EN 15267-3 [Note 1]
		Carbon monoxide	No Limit	Periodic	Every three years	MCERTS BS EN15058
A2 [Point A1 on site plan in Schedule 7]	Boiler Plant 2. 3.2 MWth Existing medium combustion plant fuelled on natural gas	Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> )	250 mg/m <sup>3</sup> limit applies from 01/01/2030	Periodic	Every three years	BS EN 15267-3 [Note 1]
		Carbon monoxide	No Limit	Periodic	Every three years	MCERTS BS EN15058
A3 [Point A3 on site plan in schedule 7]	SCB Main odour control unit stack	Particulate matter	20 mg/m <sup>3</sup> [Note 2]	Average over sampling period	Annually	BS EN 13284-1
A4 [Point A4 on site plan in schedule 7]	SCB 5 Odour control unit stack	Particulate matter	10 mg/m <sup>3</sup> [Note 2]	Average over sampling period	Annually	BS EN 13284-1
A5 [Point A5 on site plan in schedule 7]	Line 7 odour control unit stack	Particulate matter	20 mg/m <sup>3</sup> [Note 2]	Average over sampling period	Annually	BS EN 13284-1
Note 1: certification to the MCERTS performance standards indicates compliance with BS EN 15267-3						
Note 2 – This emission limit applies from 4 December 2023, unless otherwise advised by the Environment Agency. (Existing plant only).						

<b>Table S3.2 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 emission to Anglian Water Services Sewage Treatment Works [as shown on the site plan in Schedule 7]	On site effluent treatment plant	No parameters	No limits set	--	--	--
S2 emission to Anglian Water Services Sewage Treatment Works [as shown on the site plan in Schedule 7]	Uncontaminated surface water	No parameters	No limit set	--	--	--

<b>Table S3.3 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>
Wet scrubber systems on SCB Main, SCB5 and Process Line 7	Key process parameters to include pH, air temperature, differential pressure, blowdown flow rate	In accordance with manufacturer's recommendations	None specified	Odour abatement system shall be regularly checked and maintained to ensure appropriate temperature and moisture content
Olfactometry monitoring before and after the carbon filtration beds	Odour concentration	Annually unless otherwise agreed with the Environment Agency	UKAS/MCERTs accredited	< 1000 OUE/m <sup>3</sup>

## Schedule 4 – Reporting

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

<b>Table S4.1 Reporting of monitoring data</b>			
<b>Parameter</b>	<b>Emission or monitoring point/reference</b>	<b>Reporting period</b>	<b>Period begins</b>
Point source emissions to air Parameters as required by condition 3.5.1	A3, A4, A5	Every 12 months	1 January
	A1 and A2	First monitoring undertaken in accordance with Condition 3.1.4 to be reported within 3 months, and then every 3 years thereafter.	From first monitoring requirements in accordance with Condition 3.1.4

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

<b>Table S4.3 Performance parameters</b>		
<b>Parameter</b>	<b>Frequency of assessment</b>	<b>Units</b>
Water usage	Annually	m <sup>3</sup>
Energy usage	Annually	MWh
Waste	Annually	tonnes
Food waste	Annually	Tonnes
COD efficiency	Annually*	COD te/te product

\*COD efficiency to be calculated on a weekly frequency, reported annually

<b>Table S4.4 Reporting forms</b>		
<b>Parameter</b>	<b>Reporting form</b>	<b>Form version number and date</b>
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
Food waste	Food waste Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1 06/02/2023
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	

<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>	
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>	
<b>To be notified within 24 hours of detection</b>	
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>	
<b>To be notified within 24 hours of detection</b>	
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.

“average over the sampling period” means the average value of three consecutive measurements of at least 30 minutes each, unless otherwise stated, as defined in the General Considerations section of the Food, Drink & Milk Industries BAT Conclusions. For batch processes, the average of a representative number of measurements taken over the total batch time or the result of a measurement carried out over the total batch time can be used.

“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.

“Food waste” reporting: Reporting of food waste to use a methodology such as the global Food Loss and Waste Accounting and Reporting Standard (FLW standard) , WRAP’s Target Measure Act initiative or similar.

“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:

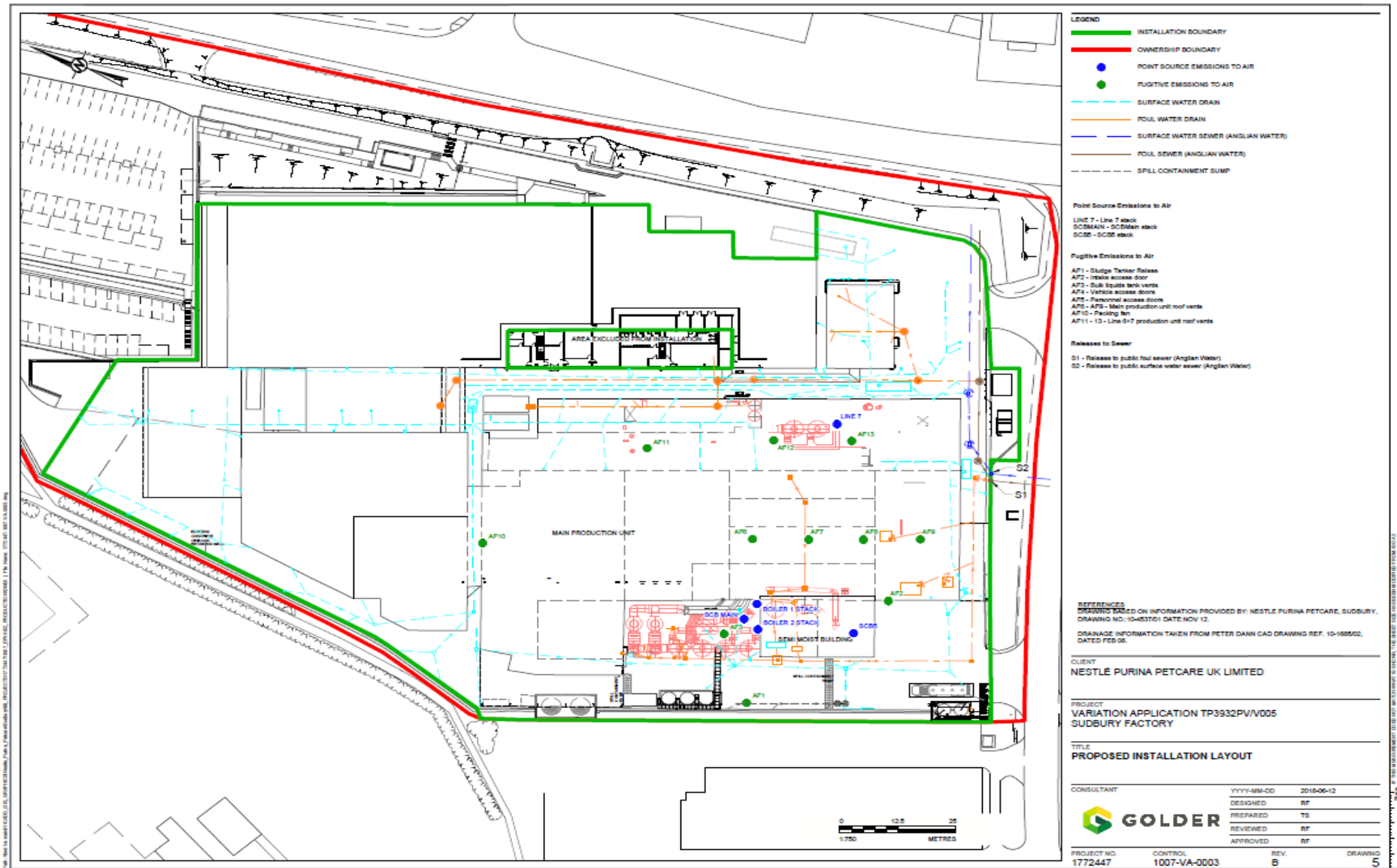
- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels 6% dry for solid fuels; and/or
- in relation to emissions from gas engines or gas turbines, the concentration 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



END OF PERMIT

Permit number  
EPR/TP3932PV

## Emissions to Air Reporting Form

**Permit number:** EPR/TP3932PV/V007

**Operator:** Nestle Purina Petcare (UK) Limited

**Facility name:** Chilton Site

**Emissions to Air Reporting Form: version 1, 08/03/2021**

Reporting of emissions to air for the period from *[DD/MM/YY]* to *[DD/MM/YY]*

<b>Emission point</b>	<b>Substance / parameter</b>	<b>Emission Limit Value</b>	<b>Reference period</b>	<b>Test method <sup>1</sup></b>	<b>Result <sup>2</sup></b>	<b>Sample dates and times <sup>3</sup></b>	<b>Uncertainty <sup>4</sup></b>
<i>[e.g. A1]</i>	<i>[e.g. Oxides of nitrogen (NO and NO<sub>2</sub> expressed as NO<sub>2</sub>)]</i>	<i>[e.g. 200 mg/m<sup>3</sup>]</i>	<i>[e.g. daily average]</i>	<i>[e.g. BS EN 14181]</i>	<i>[State result]</i>	<i>[State relevant dates and time periods]</i>	<i>[State uncertainty if not 95% confidence interval]</i>

**Signed:** *[Name]*

**Date:** *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

---

**Guidance for use:** Use this form to report your monitoring results.

Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Complete columns 1 to 5 using the information from schedule 3 of your permit. Complete columns 6 to 8 with your monitoring data. Add additional rows as necessary.

- <sup>1</sup> Where an internationally recognised standard test method is used, give the reference number. Where another method that has been formally agreed with the Environment Agency, give the appropriate identifier. In other cases state the principal technique, for example gas chromatography.
- <sup>2</sup> Give the result as the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, give the result as the 'minimum to maximum' of the measured values.
- <sup>3</sup> For non-continuous measurements give the date and time of the sample that produced the result. For continuous measurements give the percentage of the process operating time covered by the result.
- <sup>4</sup> Complete if the uncertainty associated with the result is not a 95% confidence interval. Leave blank for 95% confidence intervals.

## Water Usage Reporting Form

**Permit number:** EPR/TP3932PV/V007

**Operator:** Nestle Purina Petcare (UK) Limited

**Facility name:** Chilton Site

**Water Usage Reporting Form: version 1, 08/03/2021**

Reporting of water usage for the year [YYYY]

<b>Water source</b>	<b>Water usage (m<sup>3</sup>)</b>	<b>Specific water usage (m<sup>3</sup>/tonne of product) <sup>2</sup></b>
Mains water	<i>[insert annual usage in m<sup>3</sup> where mains water is used]</i>	Not Applicable
Site borehole	<i>[insert annual usage in m<sup>3</sup> where water is used from a site borehole]</i>	Not Applicable
River abstraction	<i>[insert annual usage in m<sup>3</sup> where abstracted river water is used]</i>	Not Applicable
Other – <i>[specify other water source where applicable. Add extra rows where needed]</i>	<i>[insert annual usage in m<sup>3</sup> where applicable]</i>	Not Applicable
Total water usage	<i>[insert total annual water usage in m<sup>3</sup>]</i>	<i>[insert total water use per tonne of product produced m<sup>3</sup>/t]</i>

**Operator's comments**

--

<b>Operator's comments</b>

**Signed:**     *[Name]*

**Date:**       *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

---

**Guidance for use:** Use this form to report your annual water usage.  
Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Add additional rows as necessary.

## Food Waste Reporting Form

**Permit number:** EPR/TP3932PV/V007

**Operator:** Nestle Purina Petcare (UK) Limited

**Facility name:** Chilton Site

**Food Waste Reporting Form: version 1, 06/02/2023**

Reporting of food waste for the period from [DD/MM/YY] to [DD/MM/YY]

<b>Overall food waste (tonnes)</b>	
<b>Food waste as % of product</b>	
<b>Food waste disposal routes</b>	<i>As specified below</i>

<b>Source</b>	<b>Tonnage</b>
<b>Redistribution for human consumption</b>	
<b>Animal feed</b>	
<b>Bio-based materials/biochemical processing (e.g. feedstock for other industrial products)</b>	
<b>Anaerobic digestion/codigestion</b>	
<b>Composting/aerobic processes</b>	
<b>Incineration/controlled combustion</b>	



<b>Land application</b>	
<b>Landfill</b>	
<b>Sewer/wastewater treatment (e.g. as COD)</b>	
<b>Other (Please specify)</b>	

**Signed:** [Name]

**Date:** [DD/MM/YY]

(Authorised to sign as representative of the operator)

**Guidance for use:** Use this form to report your food waste metrics.

Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information.

**Rationale:** Avoidance of food waste is a key issue for the sector, both nationally and globally, and is subject to a United Nations Sustainable Development Goal: SDG 12.3: “By 2030, halve per capita global food waste at the retail and consumer levels and reduce food losses along production and supply chains, including post-harvest losses”.

This complements Defra’s Food and drink waste hierarchy: deal with surplus and waste - GOV.UK (www.gov.uk) and WRAP’s Target Measure Act Initiative.

Reporting of food waste should be to a set methodology such as the global Food Loss and Waste Accounting and Reporting Standard (FLW standard).

## Energy Usage Reporting Form

**Permit number:** EPR/TP3932PV/V007

**Operator:** Nestle Purina Petcare (UK) Limited

**Facility name:** Chilton Site

**Energy Usage Reporting Form: version 1, 08/03/2021**

Reporting of energy usage for the year [YYYY]

Energy source	Energy consumption / production (MWh)	Specific energy consumption (MWh/tonne of product) <sup>2</sup>
Total	<i>[insert total energy use in MWh]</i>	<i>[insert total energy use per tonne of product MWh/tonne of product]</i>

<b>Operator's comments</b>

**Signed:** *[Name]*

**Date:** *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

---

**Guidance for use:** Use this form to report your annual energy usage.

Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Add additional rows as necessary.

<sup>1</sup> Multiply delivered electricity by 2.4 to convert to primary energy where the electricity is supplied from the national grid. If the electricity is supplied from another source, specify the conversion factor used. Add additional rows as needed if electricity is imported from multiple sources.

<sup>2</sup> Divide energy consumption by an appropriate unit of raw material processed or product output.

## Other Performance Parameters Reporting Form

**Permit number:** EPR/TP3932PV/V007

**Operator:** Nestle Purina Petcare (UK) Limited

**Facility name:** Chilton Site  
**08/03/2021**

**Other Performance Parameters Reporting Form: version 1,**

Reporting of other performance parameters for the period from *[DD/MM/YY]* to *[DD/MM/YY]*

Parameter	Units
<i>[e.g. Total raw material usage]</i>	<i>[e.g. tonnes per production unit]</i>
Total raw material used	tonnes
Compound feed production	tonnes
Dry pet food production	tonnes
Wet pet food production	tonnes
Effluent treated	m3
Waste sent for recovery (specify route)	tonnes
Waste sent for recycling (specify route)	tonnes
Total product waste sent for disposal (specify route)	tonnes

**Operator's comments**

--

<b>Operator's comments</b>

**Signed:**     *[Name]*

**Date:**       *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

---

**Guidance for use:** Use this form to report the performance parameters (other than water and energy) required by your permit. Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. The parameters to report and units to be used can be found in the 'Performance parameters' table in schedule 4 of your permit. Add additional rows as necessary.