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Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Mars Petcare UK

Castle Petcare Blackworthy Road Castle Cary Somerset BA7 7PH

Variation application number

EPR/WP3437QD/V003

Permit number

EPR/WP3437QD

Castle Petcare Permit number EPR/WP3437QD

Introductory note

This introductory note does not form a part of the notice

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

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

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

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

The schedules specify the changes made to the permit.

The main features of the permit are as follows.

The installation is located on the outskirts of Castle Cary, in a semi-rural environment in Somerset. The grid reference for the site is ST 62928 32659. The food and drink installation manufactures dried pet food with a production capacity of up to 30,000 tonnes per year of final product. The process involves five main steps: raw materials reception, weighing, grinding, and mixing, extrusion, drying, coating and cooling, packaging, storage and shipping.

The operation of this installation is regulated under:

Section 6.8 Part A(1) (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 - 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—75 if A is equal to 10 or more tonnes.

Raw materials are received by road transport with samples taken for quality testing before the transport is unloaded. Raw materials are logged and issued with a unique code which remains with the raw material during the lifetime of the product. Products are stored in silos before being weighed, finely ground and then mixed together to a precise recipe. After grinding, flour is mixed in followed by vitamins and minerals. Water is then added to the mixture to give a homogenous paste.

The paste is cooked at 120°C and under 10bar pressure before it is pushed through a die plate to produce a string of paste, which is then cut to size. The kibbles are dried on beds until the water content drops from 20% to 8%. The kibbles are sieved to remove any fines or particles produced when the kibbles are stirred. These particles are reintroduced to the feeders to keep waste to a minimum. Once dried the kibbles are coated with liquids and powders to add flavour.

They are then cooled from 60°C to 20°C to avoid condensation. All of the above activities are controlled by automated systems. A control sample is taken every 30 minutes. The kibbles are weighed and bagged in 90g – 15kg bags ready for shipping. The operator checks for content, bag closure, weight, traceability information, sealing and oxygen levels.

For the generation of steam used in production, the site uses two boilers of 4.4-megawatt thermal (MWth) combined input fuelled by natural gas only. The exhaust gases are released through air emission point A2.

Other emission points releasing particulates and odour: A3, A4, A6, and A7 are abated with cartridge and carbon filters respectively.

The site operates its own effluent treatment plant (ETP) for treating the process effluent generated prior to discharging it to sewer under consent. The ETP process consists of neutralisation, chemical dosing, dissolved air floatation (DAF), coagulation and flocculation. Uncontaminated surface water runoff is discharged via interceptor through water emission point W1 in a local attenuation pond situated within the site's boundary. This water eventually reaches the River Brue.

There are no protected European sites or Sites of Special Scientific Interest within 10km or 2km (respectively) of the installation. Two Local Wildlife Sites are within the relevant screening distances.

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

Status log of the permit						
Description	Date	Comments				
Application received EPR/XP3336SR/A001	Duly made 25/01/2006	Application received for the production of dry pet food				
Permit determined EPR/XP3336SR	22/09/2006	Permit issued to Pet Food Holdings Ltd				
Application Variation EPR/XP3336SR/V002	Duly made 23/06/2008	Variation application to upgrade the odour abatement plant to a three-stage odour removal process.				
Variation determined EPR/XP3336SR	31/07/2008	Varied permit issued.				
Application EPR/WP3437QD/T001 (full transfer of permit EPR/XP3336SR)	Duly made 21/06/2019	Application to transfer the permit in full to Mars Petcare UK.				
Application EPR/WP3437QD/V002 (variation and consolidation)	Duly made 17/10/2019	Application to add a point source emission to air with odour abatement and update the permit to modern conditions.				
Variation determined EPR/WP3437QD	27/06/2019	Varied permit issued.				
Application EPR/WP3437QD/V003 (variation and consolidation)	Regulation 61 Notice response received 31/05/2022	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.				
Additional information received	15/12/2023	Further information regarding BATcs 1, 5, 6, 7, 11, 12, EPLs, 17, MCPs, air emission points, containment, updated site emission points plan.				
Variation determined and consolidation issued EPR/WP3437QD	19/02/2024	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/WP3437QD

Issued to

Mars Petcare UK ("the operator")

whose registered office is

3d Dundee Road Slough Berkshire SL1 4LG

company registration number 06649984

to operate a regulated facility at

Castle Petcare
Blackworthy Road
Castle Cary
Somerset
BA7 7PH

to the extent set out in the schedules.

The notice shall take effect from 19/02/2024.

Name	Date
Marcus Woodward	19/02/2024

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/WP3437QD

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/WP3437QD/V003 authorising,

Mars Petcare UK ("the operator"),

whose registered office is

3d Dundee Road Slough Berkshire SL1 4LG

company registration number 06649984

to operate an installation at

Castle Petcare
Blackworthy Road
Castle Cary
Somerset
BA7 7PH

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

Name	Date
Marcus Woodward	19/02/2024

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;
 - 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 For the following activities referenced in schedule 1, table S1.1 (AR1) 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.
- 3.1.4 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 table S3.1;
- 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

Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR1	Section 6.8 Part A 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. 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.	From receipt of raw materials through to dispatch of final product, dried pet food. Production capacity is limited to 86 tonnes per day.
Directly Asso	ociated Activity		
AR2	Water treatment	Physico-chemical Treatment of non-hazardous waste waters by pH adjustment.	From generation of waste water to discharge to sewer.
AR3	Steam supply	Medium Combustion plants: Boiler 1: 0.9 MWth Boiler 2: 3.5 MWth Natural gas fired	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.

Table S1.2 Operating techniques						
Description	Parts	Date Received				
Application	The response to questions B2.1.17, B2.2.1, B2.2.6, B2.2.13, B2.2.44, B2.2.50, B2.2.56, B2.2.57 and paragraphs 6.9 – 6.12, 7.13 and 14.6 – 14.7 of the supplementary information in the application.	25/01/2006				
Application	 Application supporting document: Details of new emission point and abatement system, Investigation of Extraction Requirements for Existing Odour Abatement Biofilter System. Ref AP5029. 	Duly made 17/08/2018				
Response to Schedule 5 Notice dated 30/01/2019	 Schedule 5 notice response including the following operating techniques: Schedule 5 response letter, excluding points, 1, 5, 6, 7, 12, 14, 15, 16 and 17. Particulate and dust control measures, Design Risk Assessment, Ref AP5029A 	19/02/2019				
Response to Schedule 5 Notice dated 14/03/2019	Schedule 5 notice response including the following operating techniques: • Schedule 5 response letter including BAT statement on dust and odour abatement proposals excluding points, Schedule 7, Schedule 8, Schedule 9 and Schedule 10.	09/04/2019				
Additional information	Response to email dated 18/04/2019 requesting further information on BAT for the odour abatement system. Operating techniques include: • Email dated 25/04/2019. • Odour testing, Odour Discrimination Testing. Ref PR-27665	25/04/2019				
Regulation 61 (1) Notice – Responses to questions dated 31/01/2022	All parts	Received 31/05/2022 Resubmitted 05/12/2023				
Request for further information dated 15/12/2023	Supplementary information regarding BATcs 1, 5, 6, 7, 11, 12, EPLs, 17, MCPs, air emission points, containment, updated site emission points plan	18/12/2023				

Table S1.3 Improvement programme requirements							
Reference	Requirement	Date					
IC26	The operator shall confirm, achievement of the 'Narrative' BAT conclusions as identified in the Food, Drink and Milk Bref published on 4 December 2019 where BATc 6 and 7 are currently not demonstrated or achieved with respect to BATc. Refer to BAT Conclusions for a full description of the BAT requirement.	3 months from date of issue or as agreed in writing by the Environment Agency					

Table S1.3 li	Table S1.3 Improvement programme requirements					
Reference	Requirement	Date				
IC27	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.	3 months from date of issue or as agreed in writing by the				
	To demonstrate compliance against BAT 9, the operator shall produce a plan for the onsite refrigerant system(s) at the installation. The plan is to be assessment by the Environment Agency and shall be incorporated within the existing environmental management system.	Environment Agency				
	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.					
IC28	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 [A4], 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 or other date as agreed in writing with the Environment Agency				
IC29	The operator shall produce a climate change adaptation plan, which will form part of the EMS.	12 months from permit issue or other date as agreed in writing with the Environment				
	The plan shall include, but not be limited to:					
	Details of how the installation has or could be affected by severe weather;					
	The scale of the impact of severe weather on the operations within the installation;	Agency				
	An action plan and timetable for any improvements to be made to minimise the impact of severe weather at the installation.					
	The Operator shall implement any necessary improvements to a timetable agreed in writing with the Environment Agency.					

Schedule 2 – Waste types, raw materials and fuels

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

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 0.9 MWth Natural gas fired	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	No limit included			
		Carbon monoxide	No limit included			
A2 [Point A2 on site plan in Schedule 7]	Boiler 2 3.5 MWth Natural gas fired [Note 1]	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	250 mg/m ³	Periodic	Every three years	BS EN 14792
		Carbon monoxide	No Limit	Periodic	Every three years	MCERTS BS EN15058
A3 [Point A3 on site plan in Schedule 7]	Raw materials area exhaust via cartridge filter	Particulate matter	20 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A4 [Point A4 on site plan in Schedule 7]	Grinder via cartridge filter	Particulate matter	10 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A6 [Point A6 on site plan in Schedule 7]	Combined exhaust outlets from condenser and carbon abatement	Odour	No limit set			
A7 [Point A7 on site plan in Schedule 7]	Exhaust outlet from carbon abatement (for coater plant via fabric filter)	Odour	No limit set			

Note 1: This emission limit and monitoring requirement are applicable from 01 January 2030, unless otherwise advised by the Environment Agency.

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W1 [Point W1 on site plan in schedule 7] emission to River Brue	Uncontaminated surface water from site via interceptor, shut off valves and attenuation pond	No parameter set	No limit set			

Emission point ref. & location	Source	Parameter	Limit (incl. Unit)	Reference period	Monitoring frequency	Monitoring standard or method
S1 [Point S1 on site plan in schedule 7] emission to Wessex Water Services Limited sewage treatment works	Treated process effluent from onsite effluent treatment plant	No parameters set	No limit set			

Schedule 4 – Reporting

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

Table S4.1 Reporting of monitoring data						
Parameter	Emission or monitoring point/reference	Reporting period	Period begins			
Point source emissions	A3 and A4	Every 12 months	1 January			
to air Parameters as required by condition 3.5.1	A2 – Boiler 2	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			

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

Table S4.3 Performance parameters			
Parameter	Frequency of assessment	Units	
Water usage	Annually	m³	
Energy usage	Annually	MWh	
Waste	Annually	tonnes	
COD efficiency	Annually *	COD te/te product	
Total raw material used	Annually	tonnes	
*COD efficiency to be calculated on a weekly frequency, reported annually			

Table S4.4 Reporting forms			
Parameter	Reporting form	Form version number and date	
Point source emissions to air	Emissions to Air Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021	
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				
(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution				
To be notified within 24 hours of	detection			
Date and time of the event				
Reference or description of the location of the event				
Description of where any release into the environment took place				
Substances(s) potentially released				
Best estimate of the quantity or rate of release of substances				
Measures taken, or intended to be taken, to stop any emission				
Description of the failure or accident.				
(b) Notification requirements for the breach of a limit				
To be notified within 24 hours of	detection unless otherwise specified below			
Emission point reference/ source				
Parameter(s)				

Measured value and uncertainty

Date and time of monitoring

	the breach of a limit	
To be notified within 24 hours of	detection unless otherw	rise specified below
Measures taken, or intended to be taken, to stop the emission		
Time periods for notification follo	wing detection of a brea	ach of a limit
Parameter		Notification period
(c) Notification requirements for	he breach of permit cor	nditions not related to limits
To be notified within 24 hours of de	ection	
Condition breached		
Date, time and duration of breach		
Details of the permit breach i.e. what happened including impacts observed.		
Measures taken, or intended to be taken, to restore permit compliance.		
(d) Notification requirements for	the detection of any sign	nificant adverse environmental effect
To be notified within 24 hours of		
Description of where the effect on the environment was detected		
Substances(s) detected		
Concentrations of substances detected		

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

"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 or background concentration 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.

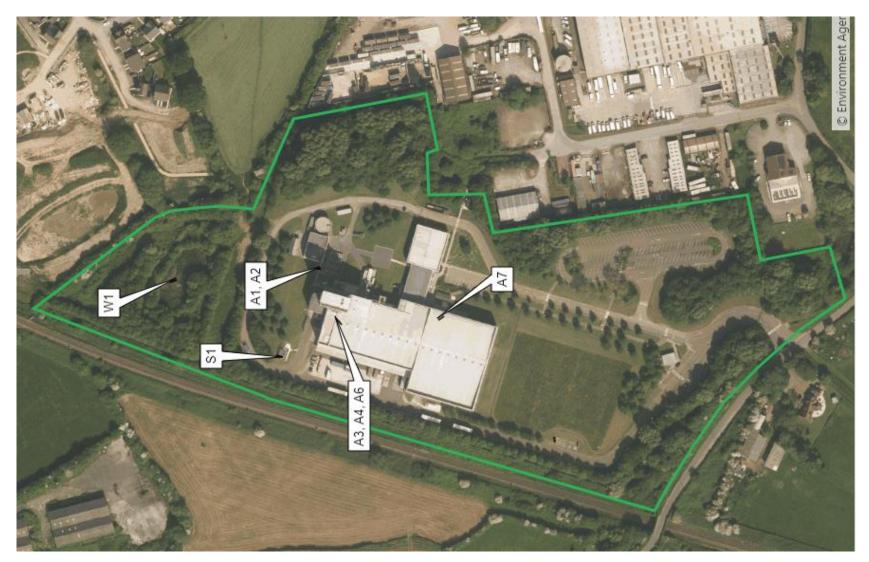
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

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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