

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Dunhills (Pontefract) PLC

Haribo UK - Pontefract Confectionery
26 Front Street
Pontefract
West Yorkshire
WF8 1NJ

Variation application number

EPR/LP3232EG/V004

Permit number

EPR/LP3232EG

Haribo UK - Pontefract Confectionery

Permit number EPR/LP3232EG

Introductory note

This introductory note does not form a part of the notice

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

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

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

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

The schedules specify the changes made to the permit.

The Haribo UK - Pontefract Confectionery site is an installation located in Pontefract, West Yorkshire. The site is set in an urban area and is bound by public highways to all sides. The nearest residential receptors lie 55m northeast of the site, with further residential areas located 150m to the south and 165m to the west. The site undertakes the production of gelatine based confectionery.

The Environmental Permit is for the following scheduled activity:

Section 6.8 Part A (1) (d) (iii) (bb) - Treatment and processing, of 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 $[300 - (22.5 \times A)]$ tonnes per day (where 'A' is the portion of animal material in percent of weight of the finished product production capacity and is less than 10%).

The factory has the capacity to produce 180 tonnes of finished product per day with approximately 6% animal material (gelatine) content.

The key stages of the process undertaken at the installation are receipt and storage of raw materials, preparation and cooking of ingredients, chilling, and packaging. The fully prepared and packaged product is sent off site for storage and distribution.

Jelly confectionery is produced by mixing glucose syrup, sugar dextrose and gelatine or starch. Colouring and flavours are added to the mixture on the production line. Liquorice confectionary is produced by mixing sugar, glucose, gelatine, liquorice extract and molasses. The recipe mix is then poured into form trays which are made from corn starch moulds. The form trays are stored in ambient conditions or air-conditioned rooms for a number of days to cure. Once cured the trays are fed back into the production machine which separates jellies and liquorice from the starch. The jellies are either then coated with oil, wax, or a sugar and citric acid mix. All products are packaged on site and sent for storage and distribution by a third party.

There are no direct emissions to surface water or groundwater from the site. Surface water run-off drains into two Yorkshire Water combined sewers at three locations, one serving the North of the site on Front Street and two to the South of the site at Watergate. There is an additional drainage system which collects all process effluent from the production processes. All process effluent is collected and removed from the site by road tanker for disposal.

Point source emissions to air arise from the operation of two 7MWth natural gas fired boilers for the generation of steam and the venting of steam and vapours from production processes and washing.

Particulates also arise from the silos, starch conditioning plant, sanding and dust extraction filters serving the starch conditioning plant and the sieving room. Particulate emissions may arise in emergency situations from the starch sieve and the colour kitchen vents.

There are no SACs, SPAs or Ramsar's within 10km, or SSSIs within 2km, of the installation boundary. There is one Local Nature Reserve and three Local Wildlife Sites within 2km of the installation boundary.

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

Status log of the permit		
Description	Date	Comments
Application received EPR/LP3232EG/A001	Duly made 17/03/2015	Application for an environmental permit for a confectionery production facility.
Response to Schedule 5 Notice	13/10/2016	Confirmation of site boundary, clarification of noise attenuation, confirmation of point source emissions to air.
Additional information received	07/11/2016	Confirmation of refrigerants used.
Permit determined	07/12/2016	Permit issued to Dunhills (Pontefract) PLC.
Application EPR/LP3232EG/V002 (received 30/01/2018)	Returned 14/02/2018	Application returned due to incorrect variation type being applied for.
Application EPR/LP3232EG/V003 (variation and consolidation)	Duly made 17/09/2018	Application to extend the site boundary, add 10 emission monitoring points and remove monitoring for emergency silo vents.
Response to Schedule 5 Notice	29/10/2018	Revised site boundary, confirmation of effluent containment measures, and revised site drainage plan.
Variation determination and consolidated permit	27/11/2018	Varied permit issued.
Application EPR/LP3232EG/V004 (variation and consolidation)	Regulation 61 Notice response received 26/01/2023	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.
Additional information received	24/01/2024	ISO 50001 certification Relevant Hazardous Substances Risk Assessment
Variation determined and consolidation issued EPR/LP3232EG	14/03/2024	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/LP3232EG

Issued to

Dunhills (Pontefract) PLC (“the operator”)

whose registered office is

26 Front Street

Pontefract

West Yorkshire

WF8 1NJ

company registration number 00160251

to operate a regulated facility at

Haribo UK - Pontefract Confectionery

26 Front Street

Pontefract

West Yorkshire

WF8 1NJ

to the extent set out in the schedules.

The notice shall take effect from 14/03/2024

Name	Date
Stacey Tapsell	14/03/2024

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/LP3232EG

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/LP3232EG/V004 authorising,

Dunhills (Pontefract) PLC (“the operator”),

whose registered office is

26 Front Street

Pontefract

West Yorkshire

WF8 1NJ

company registration number 00160251

to operate an installation at

Haribo UK - Pontefract Confectionery

26 Front Street

Pontefract

West Yorkshire

WF8 1NJ

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

Name	Date
Stacey Tapsell	14/03/2024

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;
- (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 (AR2) the first monitoring measurements shall be carried out within four months of 01/01/2025 or of the date when the MCP is first put into operation, whichever is later.

3.2 Emissions of substances not controlled by emission limits

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

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 The operator shall:
 - (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.4 Noise and vibration

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.4.2 The operator shall:
 - (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;

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

3.5 Monitoring

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

3.6 Pests

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

4 Information

4.1 Records

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

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

4.2 Reporting

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

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

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

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

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

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

4.3 Notifications

4.3.1 In the event:

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

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

4.4 Interpretation

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

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR1	Section 6.8 A(1)(d)(iii)(bb)	Treatment and processing, of 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 165 tonnes per day.	From receipt of raw materials to dispatch of finished packaged products of jelly confectionery. Production capacity is limited to 180 tonnes per day.
Directly Associated Activity			
AR2	Steam supply	<u>Medium Combustion plants:</u> 2 x 7MWth natural gas-fired boilers.	From receipt of fuel to release of products of combustion to air.
AR3	Use of refrigerants	Use of refrigerants in cooling/ chilling systems at the installation.	From receipt refrigerants to despatch of final product.
AR4	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.
AR5	Waste storage and handling	Storage and handling of waste materials.	From generation of waste to storage pending removal for disposal or recovery.
AR6	Starch conditioning	Operation of starch conditioning plant for the recycling of starch for reuse in the process.	From receipt of starch to re-use onsite.
AR7	Surface water drainage	Collection of uncontaminated site surface waters.	Handling and storage of site drainage until discharge to Yorkshire Water combined sewer.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Regulation 61 (1) Notice – Responses to questions dated 30/09/2022	All parts	Received 26/01/2023
Additional information request dated 12/01/2024	Updated R61 Response Tool	Received 24/01/2024

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC5	<p>The operator shall use refrigerants without ozone depletion potential and with a low global warming potential (GWP) in accordance with BAT 9 from the Food, Drink and Milk Industries BATCs.</p> <p>To demonstrate compliance against BAT 9, the operator shall develop a replacement plan for the refrigerant system(s) at the installation. This shall be incorporated within the existing environmental management system by the specified date.</p> <p>The plan should include, but not be limited to, the following:</p> <ul style="list-style-type: none"> • 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. • Replacement of systems containing HCFCs as soon as possible. 	14/06/2024
IC6	<p>The operator shall produce a monitoring plan detailing how the management of relevant hazardous substances which pose a risk during abnormal/ emergency situations, based on the RHS baseline assessment, will be maintained and monitored to mitigate the risks of pollution. The plan shall be submitted for approval.</p> <p>The plan shall be implemented in accordance with the Environment Agency's written approval, including timescales to undertake any infrastructure improvements.</p>	14/03/2025
IC7	<p>The operator shall produce a climate change adaptation plan, which will form part of the EMS.</p> <p>The plan shall include, but not be limited to:</p> <ul style="list-style-type: none"> • Details of how the installation has or could be affected by severe weather; • The scale of the impact of severe weather on the operations within the installation; • An action plan and timetable for any improvements to be made to minimise the impact of severe weather at the installation. <p>The Operator shall implement any necessary improvements to a timetable agreed in writing with the Environment Agency.</p>	14/03/2025

Schedule 2 – Waste types, raw materials and fuels

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

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1 on site plan in Schedule 7	Byworth Boiler 1 7.0 MWth natural gas fired	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	200 mg/m ³ [NOTE 1]	Periodic	Every three years	MCERTS BS EN14792
		Carbon monoxide	No limit set	Periodic	Every three years	MCERTS BS EN15058
	Marshall Boiler 2 7.0 MWth natural gas fired	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	200 mg/m ³ [NOTE 1]	Periodic	Every three years	MCERTS BS EN14792
		Carbon monoxide	No limit set	Periodic	Every three years	MCERTS BS EN15058
A2 – A3 on site plan, in Schedule 7	Sugar silo vents	Particulate matter	No limits set	--	--	--
A4 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A4.1 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A5 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A5.1 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A6 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A6.1 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A7 on site plan, in Schedule 7	Starch conditioning	Particulate matter	50 mg/m ³	Average over	Annually	BS EN 13284-1

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
	plant vents via bag filter			sampling period		
A8 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A9 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A10 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A10.1 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A11 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A11.1 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A12 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A13 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A13.1 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A13.2 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A13.3 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A14 on site plan, in Schedule 7	Starch conditioning plant vents via bag filters	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1

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
A14.1 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A14.2 on site plan, in Schedule 7	Starch conditioning plant vents via bag filter	Particulate matter	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A15 - A17 on site plan, in Schedule 7	Sanding plant vents	Water vapour	No limits set	--	--	--
A18 on site plan, in Schedule 7	Steam extraction vent	Water vapour	No limits set	--	--	--
A19 on site plan, in Schedule 7	Tray wash vent	Water vapour	No limits set	--	--	--
A20 on site plan, in Schedule 7	Starch sieve vent via bag filters	Particulate matter	No limits set	--	--	--
A21 on site plan, in Schedule 7	Colour kitchen vent	Particulate matter	No limits set	--	--	--
NOTE 1 – Emission limits and monitoring apply from 1 January 2025, unless otherwise advised by the Environment Agency.						

Table S3.2 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements						
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 Yorkshire Water combined sewer.	Uncontaminated surface water runoff	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 to air Parameters as required by condition 3.5.1	A4, A4.1, A5, A5.1, A6, A6.1, A7, A8, A9, A10, A10.1, A11, A11.1, A12, A13, A13.1, A13.2, A13.3, A14, A14.1, A14.2	Every 12 months	1 January
	A1	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
Confectionery produced	tonnes

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	m ³
Energy usage	Annually	MWh
Waste	Annually	tonnes
Total raw material used	Annually	tonnes
Refrigerant used	Annually	tonnes
Food waste	Annually	tonnes

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
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	

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

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

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Measures taken, or intended to be taken, to stop the emission	

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

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

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

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	

Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

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

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

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

“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.

“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.

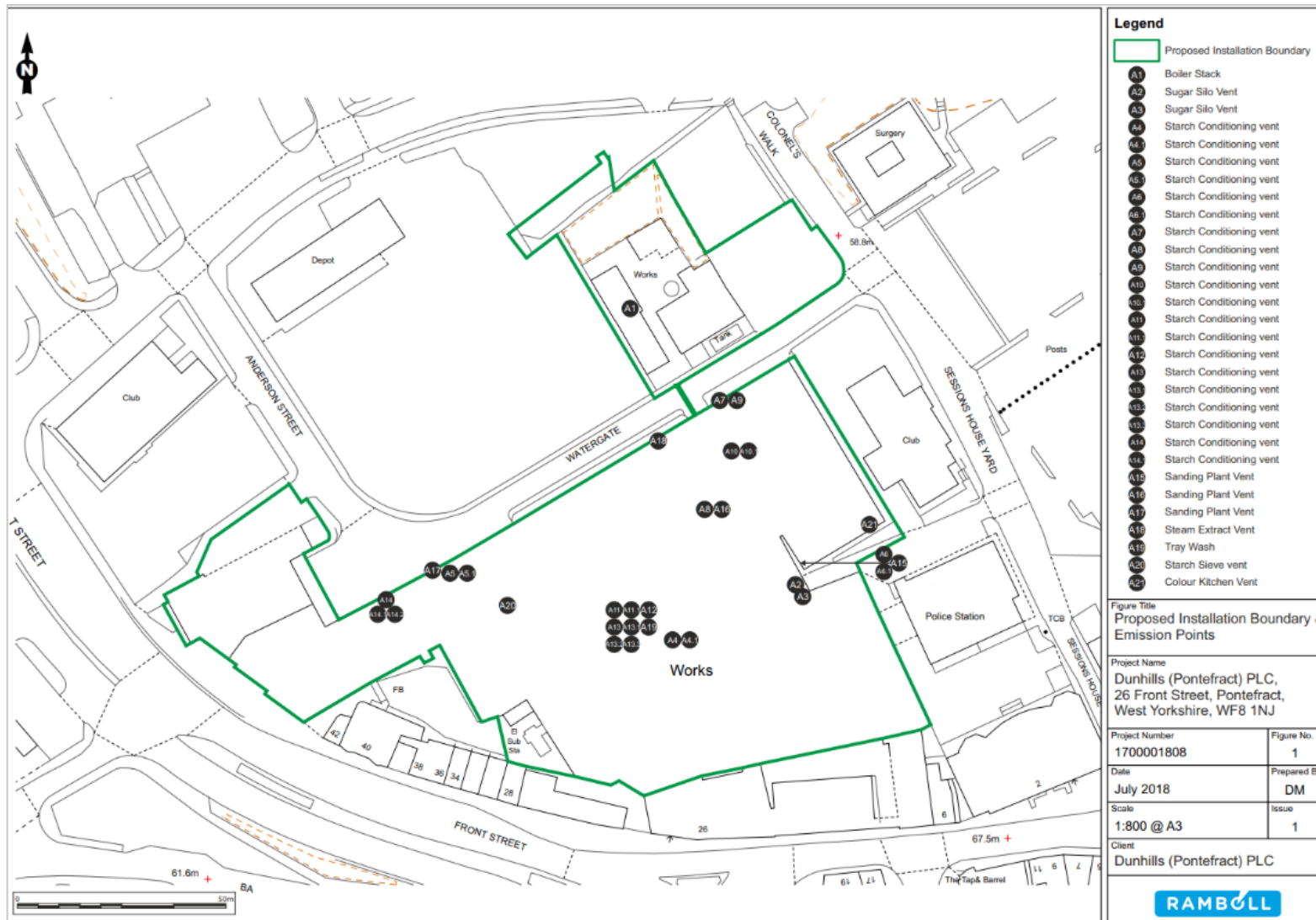
Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- 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 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



END OF PERMIT

Emission point	Substance / parameter	Emission Limit Value	Reference period	Test method ¹	Result ²	Sample dates and times ³	Uncertainty ⁴

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.

¹ 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.

² 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.

³ 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.

⁴ 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/LP3232EG*

Operator: *Dunhills (Pontefract) P L C*

Facility name: *Haribo UK - Pontefract Confectionery*

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

Reporting of water usage for the year [YYYY]

Water source	Water usage (m³)	Specific water usage (m³/tonne of product) ²
Mains water	<i>[insert annual usage in m³ where mains water is used]</i>	Not Applicable
Site borehole	<i>[insert annual usage in m³ where water is used from a site borehole]</i>	Not Applicable
River abstraction	<i>[insert annual usage in m³ 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 m³ where applicable]</i>	Not Applicable
Total water usage	<i>[insert total annual water usage in m³]</i>	<i>[insert total water use per tonne of product produced m³/t]</i>

Operator's comments

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Operator's comments

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.

Energy Usage Reporting Form

Permit number: *EPR/LP3232EG*

Operator: *Dunhills (Pontefract) P L C*

Facility name: *Haribo UK - Pontefract Confectionery*

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) ²
Electricity imported as delivered - source [specify source, e.g. supplied from the national grid]	<i>[insert annual consumption in MWh where electricity is imported]</i>	Not Applicable
Electricity imported as primary energy ¹ – conversion factor of [specify conversion factor used to convert electricity delivered to primary energy]	<i>[insert annual consumption in MWh where electricity is imported]</i>	Not Applicable
Natural gas	<i>[insert annual consumption in MWh where natural gas is used]</i>	Not Applicable
Imported heat	<i>[insert annual consumption in MWh where heat is imported]</i>	Not Applicable
Other – <i>[specify other energy source and conversion factors where applicable, e.g. renewable fuel. Add extra rows where needed]</i>	<i>[insert annual consumption in MWh where applicable]</i>	Not Applicable
Total	<i>[insert total energy use in MWh]</i>	<i>[insert total energy use per tonne of product MWh/tonne of product]</i>

Food Waste Reporting Form

Permit number: *EPR/LP3232EG*

Operator: *Dunhills (Pontefract) P L C*

Facility name: *Haribo UK - Pontefract Confectionery*

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

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

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

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

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

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).

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.