



Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Warburtons Limited

Warburtons Enfield Bakery
Delta Park
112 Millmarsh Lane
Enfield
London
EN3 7XG

Variation application number

EPR/AP3137EM/V004

Permit number

EPR/AP3137EM

Warburtons Enfield Bakery

Permit number EPR/AP3137EM

Introductory note

This introductory note does not form a part of the notice

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

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

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

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

The schedules specify the changes made to the permit.

The main features of the permit are as follows.

Warburtons Limited operates a bakery in Enfield, London (NGR TQ 36644 97159). It is set on an industrial estate with a mixture of commercial units. As this is an existing site and has the capacity to produce up to 380 tonnes of bread products per day. The Environmental Permit is for the following scheduled activity:

6.8 Part A(1) (ii) Treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed (where the weight of the finished product excludes packaging) - only vegetable raw materials with a finished product production capacity greater than 300 tonnes per day or 600 tonnes per day where the installation operates for a period of no more than 90 consecutive days in any year.

There is also an additional scheduled activity:

5.4 A(1) (a) (ii) - disposal of non-hazardous waste in a facility with a capacity exceeding 50 tonnes per day by physico-chemical treatment.

The on-site effluent treatment plant discharges to public foul sewer – it settles and doses effluent before being discharged. The discharge to the sewer is controlled under a trade effluent consent granted by Thames Water Services.

Raw materials are received on site, mixed, divided, proved, baked, cooled, packaged and dispatched off-site.

There are several ovens, burners and boilers on site that use natural gas and there are numerous emission points to air. There are no other types of fuel used for combustion. The main source emissions identified are NO_x, CO and ethanol with the potential fugitive emissions of odour, noise, dust from flour silos and surface run-off. The bakery has 5 production lines; 2 bread lines and 3 crumpet lines.

There are two ecological sensitive receptors within 500m of the installation; Lee Valley Navigation LWS and Chingford Reservoir SSSI. There are human sensitive receptors to the west of the installation, mainly residential areas and schools.

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 EPR/AP3137EM/V004	Duly made 24/03/2015	Application for new bespoke permit for a bakery.
Additional information received	15/04/2016	Additional information from applicant in relation to additional crumpet line: <ul style="list-style-type: none"> • Updated Appendix E – Site Layout Plan; • Updated Appendix F – Air Dispersion Modelling Report; • Updated Appendix G – Air Emission Points; Additional supporting information.
Additional information received	14/06/2016	Information received in response to request made 06/06/2016: <ul style="list-style-type: none"> • Additional supporting information processes and operations; • Updated consent to discharge trade effluent to sewer; • Effluent treatment schematic; Additional information on meeting EPR 6.10.
Additional information received	12/07/2016	Information received in response to request made 23/06/2016: <ul style="list-style-type: none"> • Updated H1 tool; • Updated Air dispersion Modelling Report; • Modelling files; Information on VOCs.
Additional information received	27/01/2017	Information received in response to request made 04/01/2017: <ul style="list-style-type: none"> • Revised air emissions plan – W/109/300 Rev. D, dated 27/01/2017 • Confirmation of thermal inputs; • Confirmation of space heaters; Confirmation of point source emission to air references.
Permit determined EPR/AP3137EM	28/02/2017	Permit issued to Warburtons Limited.
Application EPR/AP3137EM/V004 (variation and consolidation)	Duly made 20/07/2020	Application to vary the permit to include a 2.5MWth CHP engine and update the permit to modern conditions.
Additional information received	26/01/2021	Response to request for information dated 10/12/2020. Information to address risk of exceedance of NO ₂ critical level at habitat receptors.
Additional information received	30/03/2021	Response to request for information dated 02/03/2021. Additional information to address risk of exceedance of NO ₂ critical level at habitat receptors.
Variation determined and consolidation issued EPR/AP3137EM	24/06/2021	Varied and consolidated permit issued in modern format.

Status log of the permit		
Description	Date	Comments
Application EPR/AP3137EM/V003 (variation and consolidation)	Duly made 10/02/2023	Application to vary the permit to replace a CHP to a larger CHP and to operate the CHP and all boilers concurrently.
Additional information received	12/04/2023	Information received in response to the request made on 03/04/2023 <ul style="list-style-type: none"> Air Dispersion Modelling report Issue 1a April 2023 (updated) Modelling files (updated) Non-technical Summary (updated)
	10/05/2023	Information received in response to the request made on 03/05/2023 <ul style="list-style-type: none"> Updated site plan with all emission points marked Additional information from applicant in relation to the Air Dispersion modelling report Updated modelling result
	01/06/2023	Information received in response to the request made on 18/05/2023 Non-Technical Summary Issue 2 June 2023 (includes BAT assessment)
Variation determined and consolidation issued EPR/AP3137EM/V003 (Billing ref. DP3723PY)	Determined 10/07/2023	Varied and consolidated permit issued in modern format.
Application EPR/AP3137EM/V004 (variation and consolidation)	Regulation 61 Notice response received 02/02/2023	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.
Additional information requested	21/03/2024	Additional information request regarding BATc 6 Energy Efficiency Plan, BATc 7 wastewater minimisation and MCP.
Variation determined and consolidation issued EPR/AP3137EM/V004 (DP3723PY).	16/05/2024	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/AP3137EM

Issued to

Warburtons Limited (“the Operator”)

whose registered office is

Back O' Th' Bank House
Hereford Street
Bolton
Lancashire
BL1 8HJ

company registration number 0178711

to operate a regulated facility at

Warburtons Enfield Bakery
Delta Park
112 Millmarsh Lane
Enfield
London
EN3 7XG

to the extent set out in the schedules.

The notice shall take effect from [DD/MM/YYYY]

Name	Date
Sandra Cavill	16/05/2024

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/AP3137EM

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/AP3137EM/V004 authorising,

Warburtons Limited (“the Operator”),

whose registered office is

**Back O' Th' Bank House
Hereford Street
Bolton
Lancashire
BL1 8HJ**

company registration number 0178711

to operate an installation at

**Warburtons Enfield Bakery
Delta Park
112 Millmarsh Lane
Enfield
London
EN3 7XG**

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

Name	Date
Sandra Cavill	16/05/2024

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.

2.4 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 (AR4) 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.
- 3.3.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.4 Noise and vibration

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

3.5 Monitoring

- 3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
- (a) point source emissions specified in tables S3.1, S3.2 and S3.3;
- 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

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
AR1	Section 6.8 Part A1 (d) (ii)	Treating and processing of animal and vegetable raw materials (other than milk only) both in combined and separate products – ready to eat meals.	From receipt of raw materials to production of finished bread product including storage and dispatch offsite. Production capacity is limited to 380 tonnes per day.
AR2	Section 5.4 Part A1 (a) (ii)	Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving physico-chemical treatment. Physico-chemical Treatment of non-hazardous waste waters by dissolved air flotation/pH adjustment.	From receipt of effluent into the onsite effluent treatment plant for treatment involving settlement and the pH adjustment of effluent prior to discharge to sewer or despatch off-site. Treatment and discharge of up to 140m ³ of effluent per day from utensil and equipment cleaning, basket washers, boiler blowdown, Cleaning-in-Place (CIP) cleaning activities.
Directly Associated Activity			
AR3	Raw material storage and handling	Storage and handling of raw materials at the installation	From receipt of raw materials to dispatch of final product.
AR4	Steam supply and electrical power supply	Medium combustion plant 1x 1.4MWth natural gas boiler (Cochrane) 2x 0.7MWth natural gas boilers (Fulton 1 and 2) 1 x 3.8MWth natural gas CHP engine 9.390MWth (total) natural gas fired bread ovens and crumpet hotplates	From receipt of fuel to release of products of combustion to air.
AR5	Cooling of baked products	Operation of boilers utilising hot and cold water to cool baked goods	Combustion of natural gas in closed loop cooling system not exceeding 80 kW to cool baked products prior to slicing.
AR6	Basket wash	Operation of 4 stage basket wash process	From receipt of baskets for washing to despatch for re-use.

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
			Combustion of natural gas in the basket wash burner and 3 water heaters with an aggregated thermal input not exceeding 0.346 MWth.
AR7	Space heaters	Operation of space heaters	Combustion of natural gas to power 7 space heaters with an aggregated thermal input of 0.735 MWth.
AR8	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.
AR9	Cleaning in place (CIP)	Cleaning activities during and after production runs	From receipt of cleaning chemicals to despatch for treatment of effluent.
AR10	Waste storage and handling	Storage and handling of waste materials	From generation of waste to storage pending removal for disposal or recovery

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application	Part B3 Section 3a – Technical Standards (refers to ERP 6.10) Inclusive of section 4 (Operating techniques) from the additional supporting information received 15/04/2016	24/03/2015
Additional information received	Information received in response to request made 06/06/2016: <ul style="list-style-type: none"> • Additional supporting information processes and operations; Additional information on complying with EPR 6.10.	14/06/2016
Additional information received	Information received in response to request made 04/01/2017: <ul style="list-style-type: none"> • Revised air emissions plan – W/109/300 Rev. D, dated 27/01/17; • Confirmation of thermal inputs; • Confirmation of space heaters; Confirmation of point source emission to air references.	27/01/2017
Additional information received	Information received in response to request made 10/12/2020 Additional information to address risk of exceedance of NO ₂ critical level at SSSI. Proposed scenario to operate CHP and two boilers alternately.	26/01/2021
Variation application EPR/AP3137EM/V003 additional information	WARB.04.01/NTS Issue 2 (Non-Technical Summary June 2023 includes BAT assessment)	01/06/2023
Regulation 61 (1) Notice – Responses to questions dated 03/10/2022	All parts	Received 02/02/2023

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC3	The operator shall submit, for approval by the Environment Agency, a report demonstrating achievement of the 'Narrative' BAT conclusions as identified in the Food, Drink and Milk BREF published on 4 December 2019 where BAT is currently not demonstrated or achieved. The report shall include, but not be limited to, the following: <ul style="list-style-type: none"> • Methodology applied for achieving BAT • Demonstrating that BAT has been achieved. The report shall address the BAT Conclusions for Food, Drink and Milk Industries with respect to BATc 6. Refer to BAT Conclusions for a full description of the BAT requirement.	3 months from the issuing of the permit variation or as otherwise agreed by the Environment Agency.
IC4	The Operator shall review the adequacy and suitability of existing bund provisions, unloading points and containment at the installation, with reference to <i>CIRIA Containment systems for the prevention of pollution</i>	12 months from date of permit issue.

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<p><i>(C736) - Secondary, tertiary and other measures for industrial and commercial premises.</i></p> <p>A report of the review shall be submitted to the Environment Agency for approval which includes, as a minimum, details of:</p> <ul style="list-style-type: none"> • bunds; • any deficiencies identified, including jetting risks; • control measures on surface water run-off discharged to controlled water, including proposals for continuous monitoring of the quality of the run-off and options for auto-isolation prior to discharge where appropriate; and <p>improvements proposed and timescales for implementation.</p>	

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 ¹	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1-A7	Space heater x 7	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	--	--	--	--
		Carbon monoxide				
A8-A10	Hot plate 2 gas burner	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	--	--	--	--
		Carbon monoxide (expressed as CO)				
		Volatile organic compounds (expressed as VOC)				
A11-A13	Hot plate 1 gas burner	NO _x	--	--	--	--
		CO				
		VOC				
A14i	Boiler – HP wash room	NO _x	--	--	--	--
A14ii		CO				
A14iii		VOC				
A15	Basket wash burner	NO _x	--	--	--	--
		CO				
A16	Basket wash steam extract	Steam	--	--	--	--
A17-A18	Cooler smaller boiler	NO _x	--	--	--	--
		CO				
A19-A21	Oven burners BP1	NO _x	--	--	--	--
		CO				
		VOC				
A22	Prover BP1 gas burner	NO _x	--	--	--	--
		CO				

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location ¹	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
		VOC				
A23	Prover BP2 gas burner	NOx	--	--	--	--
		CO				
		VOC				
A24-A26	Oven burners BP2	NOx	--	--	--	--
		CO				
		VOC				
A27i	Water heaters	NOx	--	--	--	--
A27ii		CO				
A28	Boiler 1 Cochran 1x 1.4MWth running on natural gas	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	250 mg/m ³ [Note 2]	Periodic	Every three years	BS EN 14792
		Carbon monoxide	No Limit [Note 2]	Periodic	Every three years	MCERTS BS EN15058
A29	Boiler 2 Fulton 1 1x 0.7MWth running on natural gas	No parameters set	No limit set	--	--	--
A30	Boiler 3 Fulton 2 1x 0.7MWth running on natural gas	No parameters set	No limit set	--	--	--
A31	Industrial washer (external wash room)	Steam	--	--	--	--
A32	Industrial washer (external wash room)	Steam	--	--	--	--
A33i	Flour silo 1 intake filter	--	--	--	--	--
A33ii	Flour silo 2 intake filter	--	--	--	--	--
A33iii	Flour silo 3 intake filter	--	--	--	--	--
A33iv	Flour silo 4 intake filter	--	--	--	--	--

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location¹	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A33v	Flour silo 5 intake filter	--	--	--	--	--
A33vi	Flour silo 6 intake filter	--	--	--	--	--
A33vii	Flour silo 7 intake filter	--	--	--	--	--
A33viii	Flour silo 8 intake filter	--	--	--	--	--
A34i	Flour silo 1 explosion vent	--	--	--	--	--
A34ii	Flour silo 2 explosion vent	--	--	--	--	--
A34iii	Flour silo 3 explosion vent	--	--	--	--	--
A34iv	Flour silo 4 explosion vent	--	--	--	--	--
A34v	Flour silo 5 explosion vent	--	--	--	--	--
A34vi	Flour silo 6 explosion vent	--	--	--	--	--
A34vii	Flour silo 7 explosion vent	--	--	--	--	--
A34viii	Flour silo 8 explosion vent	--	--	--	--	--
A35	BP2 oven infeed hood	VOC	--	--	--	--
A36	BP2 oven outfeed hood	VOC	--	--	--	--
A37	BP1 oven infeed hood	VOC	--	--	--	--
A38	BP1 oven outfeed hood	VOC	--	--	--	--
A39	Hot plate 3 gas burner	NOx	--	--	--	--
		CO	--	--	--	--

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location¹	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
		VOC				
A40	Hot plate 3 gas burner	NOx				
		CO				
		VOC				
A41	Hot plate 3 gas burner	NOx				
		CO				
		VOC				
A42	CHP exhaust stack (3.8MWth)	NOx	95 mg/m ³	Periodic	Every 3 years	MCERTS BS EN 14792
		CO	No limit set	Periodic	Every 3 years	MCERTS BS EN 15058

1 Point source emissions to air are shown on drawing W/109/300 Revision D, dated 27/01/17.
 2 Emission limit and/or monitoring requirements apply from 1 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 on site plan in schedule 7 emission to Lee Valley Navigation.	Uncontaminated surface runoff	Visible oils, fats and grease	Non Visible	--	Monthly	Visual Inspection

Table S3.3 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 on site plan in schedule 7 emission to Thames Water Services' Deephams Wastewater Treatment Works	Site effluent treatment plant	--	--	--	--	--

Schedule 4 – Reporting

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

Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Point source emissions to air Parameters as required by condition 3.5.1	A28 (Boiler 1) A42 (CHP)	First monitoring undertaken in accordance with Condition 3.1.4 to be reported within 3 months, and then every 3 years thereafter.	1 January

Parameter	Units
Production of baked goods produced	tonnes

Parameter	Frequency of assessment	Units
Water usage	Annually	m ³
Energy usage	Annually	MWh
Total raw material used	Annually	tonnes
Waste	Annually	Tonnes
COD loss efficiency	Annually*	COD te/te product
Refrigerant Consumption	Annually	kg
Food waste	Annually	Tonnes

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

Parameter	Reporting form	Form version number and date
Point source emissions to air	Emissions to Air Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Water usage	Water Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Energy usage	Energy Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
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	

OFFICIAL

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.

“combined heat and power” (CHP) or Cogeneration means the simultaneous generation in one process of thermal energy and electrical or mechanical energy.

“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.

“first put into operation” means when fuel is first combusted in the MCP. The plant must have been fired with its design fuel up to its full load. This can be, but does not have to be, during commissioning.

“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.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

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.

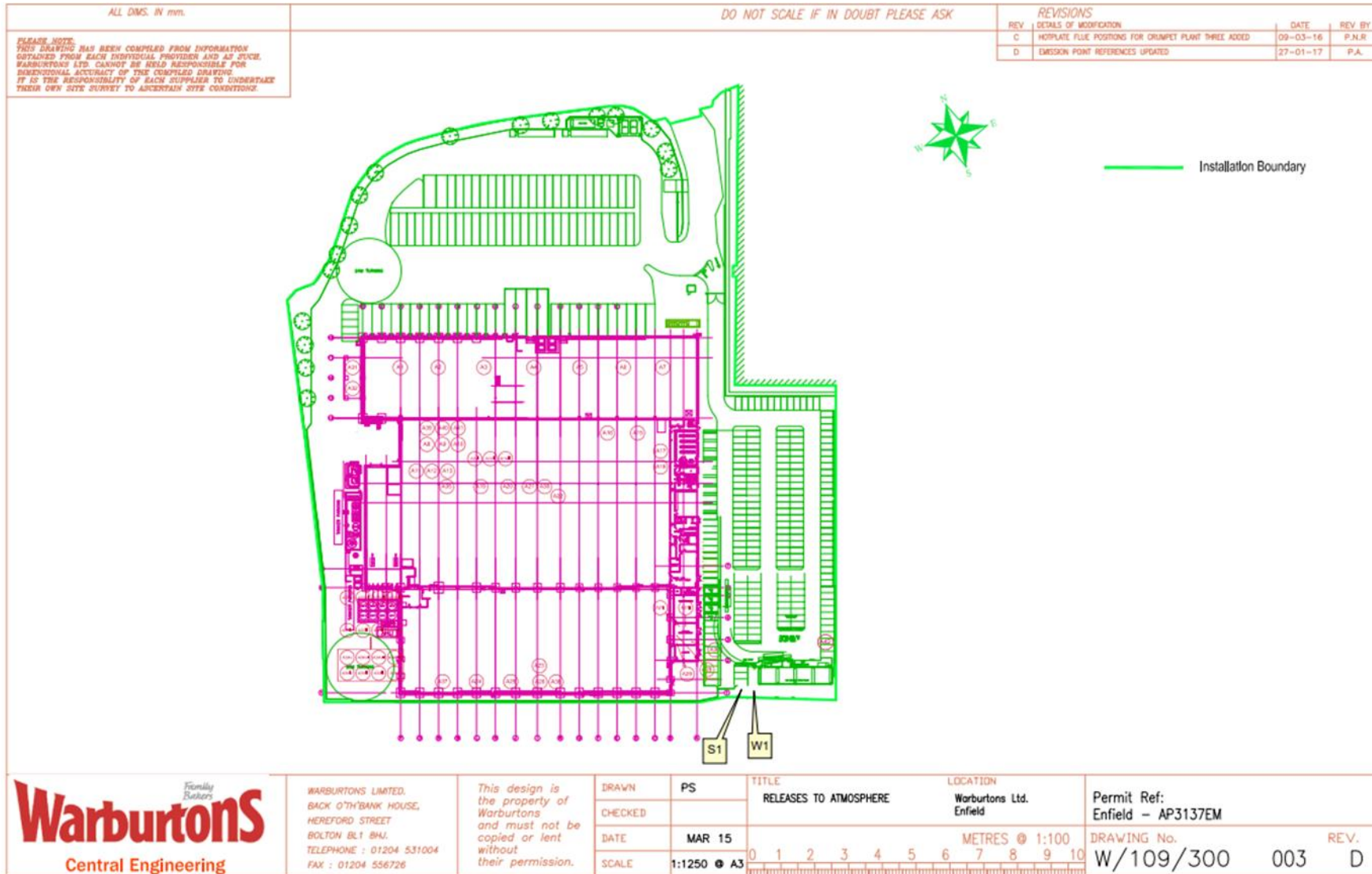
Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- 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



<p>Warburtons Central Engineering</p>	WARBURTONS LIMITED, BACK OTH'BANK HOUSE, HEREFORD STREET BOLTON BL1 8WJ, TELEPHONE : 01204 531004 FAX : 01204 556726	This design is the property of Warburtons and must not be copied or lent without their permission.	DRAWN PS CHECKED DATE MAR 15 SCALE 1:1250 @ A3	TITLE RELEASES TO ATMOSPHERE	LOCATION Warburtons Ltd. Enfield	Permit Ref: Enfield - AP3137EM DRAWING No. W/109/300 003	REV. D	
				METRES @ 1:100 0 1 2 3 4 5 6 7 8 9 10				
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END OF PERMIT