



Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Dunhills (Pontefract) PLC
Castleford Production Facility
Whitwood Common Lane
Castleford
West Yorkshire
WF10 5GT

Variation application number

EPR/SP3938DE/V003

Permit number

EPR/SP3938DE

Castleford Production Facility

Permit number EPR/SP3938DE

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 Castleford manufacturing facility is located in an urban area on Whitwood Common Lane, Castleford, West Yorkshire, WF10 5GT. The site undertakes the production of gelatine based confectionery and is permitted under:

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 installation has a daily production capacity of approximately 267 tonnes per day.

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.

There is a direct emission to surface water and to sewer from the site. Effluent associated with the production process is routed to an underground sump, which then pumps the effluent to an above ground tank prior to being removed from the installation by road tankers. The effluent drainage system is segregated from the surface water drainage system (which discharges to the Wain Dike Beck) and the wastewater system (which discharges to the municipal sewer).

Point source emissions to air arise from the operation of two natural gas fired boilers (8.7MWth and 8.35MWth) with a total capacity of 17.05MWth via emission points A10 and A35. There are also 28 air extraction emission points.

The following directly associated activities are also undertaken on site:

- Combustion - Operation of two gas fired boilers with a total power of 17.05MWth to generate steam used in the process.
- Storage of raw materials - All raw materials are stored onsite, in conditions appropriate for the protection of the materials. Storage includes silos, heated tanks, refrigeration units, and ambient warehousing.
- Generation, storage and handling of solid and liquid waste

- Cleaning – All production machines are cleaned daily (only if the machine has been used for production within the day). Cleaning chemicals for production plant is limited to a caustic solution and mild detergent.
- Storage and handling of chemicals - There are specific chemical stores for the storage of process cleaning chemicals on site.
- Starch conditioning plant – Throughout the production process starch is used to create moulds. The production machines are designed to maximize the recovery of the starch.
- Refrigeration – One central chiller serves eleven air handling units (AHUs) (nine of which are located on the roof of the production building and two of which are located on the mezzanine floor). Each AHU features a heating and cooling coil in addition to filtration of expelled air. Only one of the AHUs features a heat recovery module (the AHU serves the administrative offices), the remaining systems do not recover any heat for reuse in the heating coils or other processes. All of the air conditioned areas of the factory feature fast close doors. There are no chilled storage areas in the factory, with the exception of one mobile chilled trailer unit which operates independently of all chiller plant at the Installation, given the scale of the unit this is not considered significant.

There are two local wildlife sites and ancient woodlands 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 EPR/SP3938DE/A001	Duly made 20/03/17	Application for new bespoke environmental permit
Issued Schedule 5 Notice	16/05/2017	Requesting revised H1 assessment
Receipt of Schedule 5 response	14/08/2017	Revised H1 assessment
Permit determined EPR/SP3938DE PAS Billing ref. SP3938DE	05/09/2017	Permit issued to Dunhills (Pontefract) PLC
Application EPR/SP3938DE/V003	Duly made 16/03/2022	Application to add MCP to permit and update the permit to modern conditions
Request for information	16/03/2022	Air quality modelling report and data files
Request for information	25/03/2022	Environmental risk assessment report
Variation determined and consolidation issued EPR/SP3938DE (Billing ref: RP3603MM)	28/04/2022	Varied and consolidated permit issued in modern format
Application EPR/SP3938DE/V003 (variation and consolidation)	Regulation 61 Notice response received 30/01/2023	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review
Additional information request	24/01/2024	Additional information received confirming ISO 5001 certification and refrigeration equipment
Variation determined and consolidation issued EPR/SP3938DE	06/06/2024	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/SP3938DE

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

Castleford Production Facility

Whitwood Common Lane

Castleford

West Yorkshire

WF10 5GT

to the extent set out in the schedules.

The notice shall take effect from 06/06/2024

Name	Date
Sandra Cavill	06/06/2024

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/SP3938DE

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/SP3938DE/V003 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

Castleford Production Facility

Whitwood Common Lane

Castleford

West Yorkshire

WF10 5GT

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

Name	Date
Sandra Cavill	06/06/2024

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, 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 (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, 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
- 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	Limits of specified activity
AR1	Section 6.8 Part A1 (d)(iii)(bb) <i>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%).</i>	Manufacture of jellied confectionery including receipt and storage of raw materials; preparation and cooking of ingredients; chilling and packaging.	From receipt of raw materials to dispatch of finished packaged products. Production capacity is limited to 267 tonnes per day.
Directly Associated Activity			
AR2	Steam supply	Medium Combustion plants: 8.35 MWth natural gas fired steam boiler	From receipt of fuel to release of products of combustion to air.
		8.7 MWth natural gas fired steam boiler	From receipt of fuel to release of products of combustion to air. 3000 hours operation max. 1200 hours on standby Only one gas boiler shall be operated at any one time.
AR3	Water Treatment	Water treatment by reverse osmosis	From incoming mains water treatment for boiler feed water usage and production on site.
AR4	Use of refrigerants	Use of refrigerants in cooling, chilling and/or freezing systems and air handling units.	From receipt of refrigerant to dispatch of final product.
AR5	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.
AR6	Waste storage and handling	Storage and handling of waste materials	From generation of waste to storage pending removal for disposal or recovery.
AR7	Starch conditioning plant	Recycling of starch for reuse in the process	From receipt of starch to re-use on site
AR8	Surface water drainage	Collection of uncontaminated site surface waters	Handling and storage of site drainage until discharge to the site surface water system.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application EPR/SP3938DE/A001	B3 of the application section 3 - Answers to Section 3 on application form Part B3 including references to the Food and Drink Sector Guidance EPR 6.10 and the Food, Drink and Milk Industries BREF.	Duly Made 20/03/2017
Application EPR/SP3938DE/A001	Supporting Documents – UK16-23255, Process Overview, dated 24/11/2016	Duly Made 20/03/2017
Application EPR/SP3938DE/A001	Supporting Documents – UK16-23255, Technical Assessment of Best Available Techniques, dated 24/11/2016	Duly Made 20/03/2017
Application EPR/SP3938DE/A001	Supporting Documents – UK16-23255, Environmental Risk Assessment, dated 17/02/2017	Duly Made 20/03/2017
Application EPR/SP3938DE/A001	Supporting Documents – UK16-23255, Management System Summary, dated 23/11/2016	Duly Made 20/03/2017
Application EPR/SP3938DE/A001	Supporting Documents – EMS Document, Spill Management – P2, Spill Response Issue: 001, 20 April 2016	Duly Made 20/03/2017
Application EPR/SP3938DE/A001	Supporting Documents – SOPTEMPLATE, Issue 1 11/02.2017	Duly Made 20/03/2017
Application EPR/SP3938DE/V002	BAT document ref: 1620012070; issue number P0, dated July 2021	16/03/2022
Application EPR/SP3938DE/V002	Air quality modelling report	16/03/2022
Regulation 61 (1) Notice – Responses to questions dated 03/10/2022	All parts	Received 30/01/2023

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC3	<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 produce a plan for the onsite refrigerant system(s) at the installation. The plan is to be assessed by the Environment Agency and shall be incorporated within the existing environmental management system.</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. 	3 months from date of issue or as agreed in writing by the Environment Agency
IC4	<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>	3 months from date of issue or as agreed in writing by the Environment Agency

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<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>	

Schedule 2 – Waste types, raw materials and fuels

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

Schedule 3 – Emissions and monitoring

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1 – A9 [Points A1 to A9 on site plan in Schedule 7]	Air Handling units	Particulates	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A10 [Point A10 on site plan in Schedule 7]	Medium combustion plant operated on natural gas 1 x 8.35 MWth steam boiler	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	200 mg/m ³ (Note 1)	Periodic	Every 3 years	MCERTS BS EN 14792 (Note 1)
		Carbon monoxide	No limit set (Note 1)	Periodic	Every 3 years	MCERTS BS EN 15058 (Note 1)
A11 [Point A11 on site plan in Schedule 7]	Emergency generator exhaust	Combustion gases	--	--	--	--
A12 [Point A12 on site plan in Schedule 7]	Fire water pump exhaust	Combustion gases	--	--	--	--
A13 [Point A13 on site plan in Schedule 7]	Compressor exhaust	Combustion gases	--	--	--	--
A16 [Point A16 on site plan in Schedule 7]	Air Extraction (Dryer and Dehumidifying Unit Jelly Manufacturing Line 1)	Particulates	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A17 [Point A17 on site plan in Schedule 7]	Air Extraction (Depositing Machine Jelly Manufacturing Line 1)	Particulates	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A18 [Point A18 on site plan in Schedule 7]	Air Extraction (Cooler Jelly Manufacturing Line 1)	Particulates	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A19 [Point A19 on site plan in Schedule 7]	Air Extraction (Dryer and Dehumidifying Unit Jelly Manufacturing Line 2)	Particulates	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1

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A20 [Point A20 on site plan in Schedule 7]	Steam Extraction (Sanding Steam Curtain Jelly Manufacturing Line 2)	Water Vapour	--	--	--	--
A21	Air Extraction (Cooling Jelly Manufacturing Line 2)	Particulates	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A22	Air Extraction (Dryer and Dehumidifying Unit Jelly Manufacturing Line 2)	Particulates	50ng/m ³	Average over sampling period	Annually	BS EN 13284-1
A23	Air Extraction (Depositing Machine Jelly Manufacturing Line 2)	Particulates	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A24	Air Extraction (Cooling Jelly Manufacturing Line 3)	Particulates	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A25	Air Extraction (Dryer and Dehumidifying Unit Jelly Manufacturing Line 3)	Particulates	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A26	Air Extraction (Depositing Machine Jelly Manufacturing Line 3)	Particulates	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A27	Silo vent	-	-	-	-	-
A28	Silo vent	-	-	-	-	-
A29	Air Extraction (Cooling Jelly Manufacturing Line 4)	Particulates	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A30	Air Extraction (Dryer and Dehumidifying Unit Jelly Manufacturing Line 4)	Particulates	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A31	Air Extraction (Depositing Machine Jelly Manufacturing Line 4)	Particulates	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A32	Air Extraction (Cooling Jelly	Particulates	50 mg/m ³	Average over	Annually	BS EN 13284-1

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	Manufacturing Line 5)			sampling period		
A33	Air Extraction (Dryer and Dehumidifying Unit Jelly manufacturing Line 5)	Particulates	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A34	Air Extraction (Depositing Machine Jelly Manufacturing Line 5)	Particulates	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A35	Medium combustion plant operated on natural gas 1 x 8.7MWth steam boiler	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	100 mg/m ³	Periodic	Every 3 years	MCERTS BS EN 14792
		Carbon monoxide	-	Periodic	Every 3 years	MCERTS BS EN 15058
A36	Air extraction (Mogul Line 5 Sanding)	Particulates	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A37	Air extraction Acidulation Line (Mogul Line 5 Dryer and Dehumidifier)	Particulates	50 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
Note 1 – Emission limit and/or monitoring requirements apply from 1 January 2025, unless otherwise advised by the Environment Agency						

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W1 [Point W1 on site plan in schedule 7] emission to Wain Dike Beck	Uncontaminated surface runoff	No parameter set	No limit set	--	--	--

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 [Point S1 on site plan in schedule 7]	Boiler blow - down and boiler feedwater treatment	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	A1-A9, A16-A19, A21-A26, A29-A34	Every 12 months	1 January
	A10	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
	A35	Every 3 years	1 January

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

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

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

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

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

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

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

“average over the sampling period” means the average value of three consecutive measurements of at least 30 minutes each, unless otherwise stated, as defined in the General Considerations section of the Food, Drink & Milk Industries BAT Conclusions.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission limit.

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

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“Medium Combustion Plant” or “MCP” means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW. An “existing medium combustion plant” is combustion plant operating before 20 December 2018.

“Medium Combustion Plant Directive” or “MCPD” means Directive 2015/2193/EU of the European Parliament and of the Council on the limitation of emissions of certain pollutants into the air from medium combustion plants, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

Pests” means Birds, Vermin and Insects.

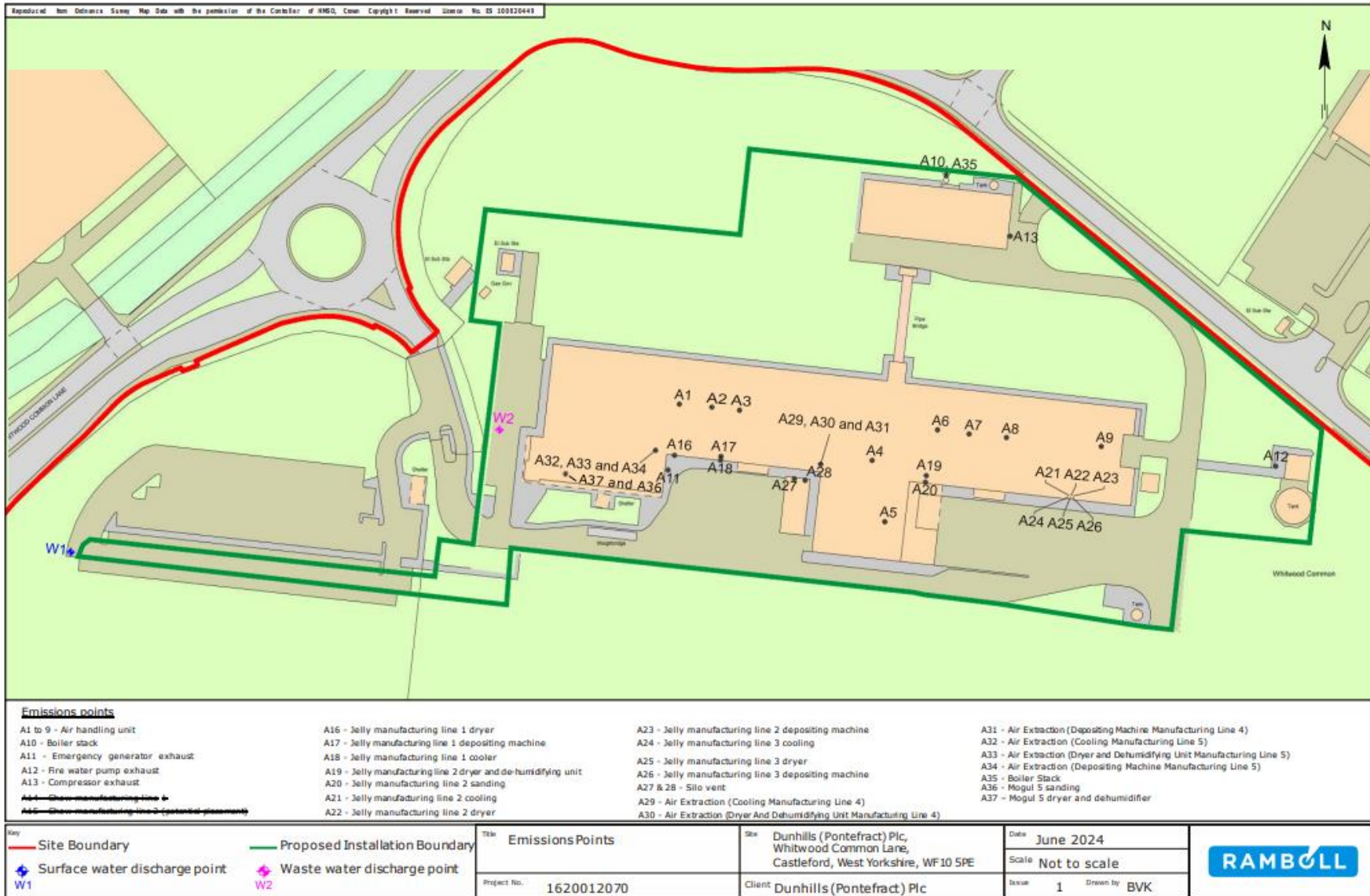
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

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

- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels 6% dry for solid fuels; and/or
 - in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content

“year” means calendar year ending 31 December.

Schedule 7 – Site plan



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END OF PERMIT

Permit number
EPR/SP3938DE

Emissions to Air Reporting Form

Permit number: [EPR/AB1234CB]

Operator: [A Company Name Limited]

Facility name: [Unit A, Anytown]

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

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

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

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/AB1234CB]

Operator: [A Company Name Limited]

Facility name: [Unit A, Anytown]

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

Reporting of water usage for the year [YYYY]

Water source	Water usage (m ³)	Specific water usage (m ³ /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

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/AB1234CB]***Operator:** *[A Company Name Limited]***Facility name:** *[Unit A, Anytown]***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

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 energy usage.

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

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

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

Food Waste Reporting Form

Permit number: [EPR/AB1234CB]

Operator: [A Company Name Limited]

Facility name: [Unit A, Anytown]

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 (<i>e.g. as COD</i>)	
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).

Other Performance Parameters Reporting Form**Permit number:** *[EPR/AB1234CB]***Operator:** *[A Company Name Limited]***Facility name:** *[Unit A, Anytown]***Other Performance Parameters Reporting Form: version 1, 08/03/2021**Reporting of other performance parameters for the period from *[DD/MM/YY]* to *[DD/MM/YY]*

Parameter	Units
<i>[e.g. Total raw material usage]</i>	<i>[e.g. tonnes per production unit]</i>

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 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.