

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Greencore Food To Go Limited

Greencore Food To Go Park Royal
8 Willenfield Road
Park Royal
London
NW10 7AQ

Variation application number

EPR/ZP3839YR/V003

Permit number

EPR/ZP3839YR

Greencore Food To Go Park Royal

Permit number EPR/ZP3839YR

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.

The schedules specify the changes made to the permit.

The main features of the permit are as follows.

Greencore Food To Go Park Royal is a sandwich and wrap production facility located on an industrial park in Park Royal, London. The main building is centred on National Grid Reference TQ19988323. The site comprises of two separate factories (factory 1 and factory 2), with an unrelated building between them. Factory 2 is used for ambient and refrigerated storage only, and for other activities which are not subject to Environmental Permitting Regulations.

The Environmental Permit is for the following scheduled activity:

Section 6.8 Part A(1) (d)(iii)(aa) – Treatment and processing of food, with a finished product production capacity of greater than 75 tonnes per day, where the proportion of animal material in the product is greater than 10%.

There is also an additional scheduled activity:

Section 5.4 Part A(1) (a)(ii) - Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving physico-chemical treatment.

Raw materials are stored (factory 2) in ambient conditions or a chilled environment between 0°C and 5°C as necessary. As required, they are then transferred to the production facility (factory 1) where they are unloaded into a low care area and stored. Transfer between factory 1 and factory 2 is using refrigerated lorry. Raw materials then pass through a sanitiser mist tunnel before entering the high care food preparation area, with the exception of bread (which does not require sanitisation) and salad/vegetables, which enter the high care area via a vegetable washing machine. There is a 200l sanitiser bath which forms a backup to the sanitiser tunnel. Ingredients are then prepared (untinned, debagged, mixed, sliced, grated etc.) and placed in tote bins or food trays. These products are stored by food group (proteins, allergens, dairy etc.) in Work-In-Progress (WIP) chillers at below 5°C until they are needed on the production lines.

The production area comprises 11 conveyor lines with a total production capacity of 154 tonnes per day, of sandwiches and wraps. For sandwiches, one side of the bread is automatically coated with a layer of butter or alternative fat. Products are then assembled by hand from raw materials. They are then fed on a conveyor into cutters and card denesters that place them into packaging – either cardboard cartons or plastic sleeves. The factory temperature for the production area is between 8°C and 12°C. The product then moves to despatch where it is boxed up or placed into sandwich trays and stored in chillers to await despatch in refrigerated lorries. The temperature in the packing area is below 5°C.

Inputs comprise food ingredients, packaging and cleaning chemicals. Wastes comprise of food, non-food and cardboard, which are segregated and sent off site for recovery or disposal. The manufacturing activity has supporting processes including 2 steam boilers (0.8 MW_{th} and 0.7 MW_{th}), refrigeration units, and a dissolved air flotation effluent treatment plant. Key emissions are products of combustion released to air, and effluent discharge to sewer. Uncontaminated surface water is released to surface drainage. Odour emissions are controlled, including using odour abatement units on the effluent treatment plant. The facility is operated under an environmental management system.

The site is bordered to the North by the Paddington branch of the Grand Union Canal, and is situated in an industrial/commercial area. Further north of the site, there are railway lines and Brent Junction. The factory lies within Brent AQMA, which has been declared since 2006 for particulate matter (PM₁₀) 24-hour mean, and nitrogen dioxide (NO₂) annual mean, and is surrounded by other London AQMAs. The nearest sensitive human receptor is Park Royal Centre for Mental Health, which is 160m from the installation. The nearest residential receptors are more than 400m from the site at Moyne Place. Richmond Park Special Area of Conservation is 8.7 km from the site, and a number of local nature reserves and wildlife sites are in proximity of the site, with the closest being the canal adjacent to the site.

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

Status log of the permit		
Description	Date	Comments
Application received EPR/ZP3839YR/A001	Duly made 18/06/2019	Application for bespoke installation permit for sandwich making factory.
Additional information received	20/06/2019	Assessment of possible cadmium, mercury and phosphate contribution from chemical raw materials.
Additional information received	31/07/2019	Clarification of chemical storage arrangements and effluent discharge.
Additional information received	14/08/2019	Additional information on position and dimensions of emissions points A1 and A2 and the buildings in which they are located.
Additional information received	19/08/2019	Additional information on chemical storage & bunding (including revised accident management plan), air emissions reports for boiler 1 and boiler 2, BAT assessment against new draft BREF, revised Odour Management Plan.
Permit determined EPR/ZP3839YR	03/12/2019	Permit issued to Greencore Food To Go Limited.
Notified of change of Registered Office address	10/08/2020	Registered Office address changed to Greencore Manton Wood, Retford Road, Manton Wood Enterprise Park Worksop, S80 2RS.
Variation issued EPR/ZP3839YR/V002	15/09/2020	Varied permit issued to Greencore Food To Go Limited.
Application EPR/ZP3839YR/V003 (variation and consolidation)	Regulation 61 Notice response received 05/04/2023	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.
Response to request for information dated 04/11/2024	Received 13/11/2024	Information requested in relation to Reg.61 response tool concerning BATc 1, 2, 6, 9, and non-narrative BAT in relation to a climate change adaptation plan and site name.

Status log of the permit		
Description	Date	Comments
Variation determined and consolidation issued EPR/ZP3839YR	16/12/2024	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/ZP3839YR

Issued to

Greencore Food To Go Limited (“the Operator”)

whose registered office is

**Greencore Manton Wood Retford Road
Manton Wood Enterprise Park
Worksop
S80 2RS**

company registration number 00721411

to operate a regulated facility at

**Greencore Food To Go Park Royal
8 Willenfield Road
Park Royal
London
NW10 7AQ**

to the extent set out in the schedules.

The notice shall take effect from 16/12/2024

Name	Date
Denise Horton	16/12/2024

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/ZP3839YR

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/ZP3839YR/V003 authorising,

Greencore Food To Go Limited (“the Operator”),

whose registered office is

**Greencore Manton Wood Retford Road
Manton Wood Enterprise Park
Worksop
S80 2RS**

company registration number 00721411

to operate an installation at

**Greencore Food To Go Park Royal
8 Willenfield Road
Park Royal
London
NW10 7AQ**

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

Name	Date
Denise Horton	16/12/2024

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.

3.2 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	Limits of specified activity
AR1	Section 6.8 Part A1 (d) (iii) (aa)	Treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed (where the weight of the finished product excludes packaging): animal and vegetable raw materials (other than milk only), both in combined and separate products, with a finished product production capacity in tonnes per day greater than: 75 if A is equal to 10 or more, where 'A' is the portion of animal material in percent of weight of the finished product production capacity.	From receipt of raw materials to production of sandwiches and wraps and preparation of component ingredients on one of 11 assembly lines to finished product including storage and dispatch off-site. Production capacity is limited to 154 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. Effluent Treatment comprising of oversize solids screening, flocculation and dissolved air floatation, and final pH adjustment.	From generation of waste water to discharge to foul sewer.
Directly Associated Activity			
AR3	Steam and hot water supply	0.7 MWth (A1) and 0.8 MWth (A2) gas-fired hot water and steam boilers.	From receipt of fuel and water to release of hot water, steam and products of combustion to air.
AR4	Raw material storage and handling	Storage and handling of raw materials at the installation.	From receipt of raw materials to dispatch of final product.
AR5	Use of refrigerants	Use of refrigerants in cooling, chilling and/or freezing systems at the installation.	From receipt of raw materials to dispatch of final product.

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR6	Storage and use of chemicals and oils	Storage and use of chemicals and oils at the installation.	From receipt of chemicals and oils to disposal of wastes arising.
AR7	Waste storage and handling	Storage and handling of waste materials.	From generation of waste to storage pending removal for disposal or recovery.
AR8	Raw material sanitisation and cleaning	Mist tunnel and immersion bath.	From receipt of ingredients from stores to delivery to food preparation or manufacturing areas.
AR9	Food preparation	Washing, processing (slicing, grating etc.).	From start of manufacture to main sandwich and wrap production lines.
AR10	Water Treatment	Ion exchange water softener.	From input of mains water to output of treated water (4m ³ /h).
AR11	Hygiene and cleaning operations	Cleaning and sanitising of production line, totes, wheeled bins and trays, involving chemicals, steam and hot water.	From requirement for cleaning to readiness for re-use for production.
AR12	Tray wash	Automated tray wash (incorporating water softening).	From requirement for cleaning to readiness for re-use for production.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application	<p>Parts B2(v12) and B3(v9) of the Application Form including technical standards listed in Table 3a of form B3.</p> <p>The Supporting Information documents referenced ZP3839YR/A001:</p> <ul style="list-style-type: none"> • <i>B2-5C Non-Technical Summary</i> • <i>B2-6 Environmental Risk Assessment</i> • <i>B3-3b Fugitive Emissions Review</i> • B3-6e Waste Management • 6 Pest management • 7 Operating techniques and BAT assessment • 8 Site Drainage plan • 11 Maintenance Management System • 12 Training Management System • 16 Resource Efficiency and Waste Minimisation review 	15/06/2019
Additional information	<p>The Supporting Information documents in response to our “request for information” prior to duly making application and referenced ZP3839YR/A001:</p> <ul style="list-style-type: none"> • RFI1 Emission Point Plan v2 • RFI 1.1 revised Application Form B3 • RFI2 ETP layout • RFI 2.1 ETP spill containment 	20/06/2019

Table S1.2 Operating techniques		
Description	Parts	Date Received
	<ul style="list-style-type: none"> RFI5 Chemical inventory and storage plan RFI6 Ground and groundwater protection measures RFI10 revised accident management plan 	
Additional information	Further information on bulk chemical storage and bunding in Effluent Treatment Plant area.	31/07/2019
Additional information	Revised Odour Management Plan.	14/08/2019
Additional information	BAT readiness assessment against new draft Food and Drink BREF	19/08/2019
Regulation 61 (1) Notice – Responses to questions dated 30/09/2022	All parts	Received 05/04/2023
Regulation 61(1) Notice – request for further information dated 04/11/2024	Technical standards in relation to Best available techniques as described in BAT conclusions under Directive 2010/75/EU of the European Parliament and of the Council on establishing best available techniques (BAT) conclusions for the food, drink and milk industries, BAT Conclusions Numbers 1-17.	Received 13/11/2024

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	<p>The Operator shall submit a written plan to the Environment Agency for technical assessment and approval. The plan must assess the operational effectiveness of secondary containment in the Effluent Treatment Plant and surrounding area. It must consider the design, method of construction and integrity of the system, and be carried out by suitably competent and qualified personnel. The assessment shall be made against the requirements of our guidance and Ciria C736^(ref 1-3). Where improvement requirements are identified, the plan must contain dates for their implementation. Improvements should include (but are not limited to):</p> <ul style="list-style-type: none"> ensuring that jetting leak screens drain within bunded areas, investigations to confirm that containment would be effective, in the event of balance tank failure, integrity testing of bunds and drains, sealing off drains which are unused or which would compromise the containment plan, modification of containment design, so that bunded areas or sub-areas collect and do not drain back to the ETP inlet, any associated repairs or modifications to existing infrastructure including containment provided by the outside storage yard, plans for testing and maintenance to ensure ongoing fitness for purpose <p>The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the plan. You must implement the plan as approved, and from the date stipulated by the Environment Agency.</p> <p>References:</p>	6 months from date of issue or as agreed in writing by the Environment Agency 16/06/2025

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<ol style="list-style-type: none"> 1. https://www.gov.uk/guidance/pollution-prevention-for-businesses 2. https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit 3. CIRIA 736 Containment systems for the prevention of pollution- <i>Secondary, tertiary and other measures for industrial and commercial premises</i>, London 2014, ISBN: 978-0-86017-740-1. 	
IC2	<p>The Operator shall submit a written plan to the Environment Agency for technical assessment and approval. The report provided shall be agreed in writing by the Environment Agency in order for the improvement condition to be completed. The plan must:</p> <ol style="list-style-type: none"> 1. assess the need for, and feasibility of measures to further protect ground and surface water from possible releases from areas of operational hardstanding outside Factory 1 and Factory 2, and from drainage within Factory 2. 2. demonstrate that that only uncontaminated surface water runoff is discharged to surface water drains (W1 and W2). <p>The assessment shall be made against the requirements of our guidance^(ref1-2). Where additional measures to reduce this risk are identified, the plan must contain dates for their implementation. Improvements could include (but are not limited to):</p> <ul style="list-style-type: none"> • diverting water away from surface water drains (in either all operational scenarios, or under specific conditions) where there is a risk of contamination, • identifying and sealing off unused surface water drains, or those which present a risk of surface water contamination, particularly those inside factory 2, • changes to operational practices (e.g. what activities are carried out in yard areas which drain to surface water), • installing oil interceptors, • manually or automatically detecting contamination and instigating protective action such as operation of the surface water isolation valve, • any necessary repairs/improvements to existing infrastructure including concrete surfaces and expansion joints, • plans for inspection, testing and maintenance of drainage and surfaces to ensure ongoing fitness for purpose, • monitoring to confirm that no contamination of surface water is detected, <p>You must implement the plan as approved, and from the date stipulated by the Environment Agency. You must provide updated drainage plan(s) if alterations are made</p> <p>References:</p> <ol style="list-style-type: none"> 1. https://www.gov.uk/guidance/pollution-prevention-for-businesses 2. https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit 	<p>6 months from date of issue or as agreed in writing by the Environment Agency 16/06/2025</p>
IC3	<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>	<p>12 months from date of issue or as agreed in writing by the</p>

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>	Environment Agency 16/12/2024

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.	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1 [Point A1 on site plan in Schedule 7]	Boiler Plant 1 0.7 MWth natural gas fired boiler	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	No limit set	--	--	--
		Carbon monoxide	No limit set	--	--	--
A2 [Point A2 on site plan in Schedule 7]	Boiler Plant 2 0.8 MWth natural gas fired boiler	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	No limit set	--	--	--
		Carbon monoxide	No limit set	--	--	--
A3 [Point A2 on site plan in Schedule 7]	Odour extraction unit from Effluent Treatment Plant room	Odour	No limit set	--	--	--
A4 [Point A2 on site plan in Schedule 7]	Odour abatement unit from Effluent Treatment Plant Sludge Tank	Odour	No limit set	--	--	--

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements						
Emission point ref. & location on site plan in schedule 7	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W1 emission to Thames Water Wastewater storm drain	Uncontaminated surface runoff from surfaced areas (yard and roof) of Factory 1	No parameter set	No limit set	--	--	--
W2 emission to Thames Water Wastewater storm drain	Uncontaminated surface runoff from surfaced areas (yard and roof) of Factory 2	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 on site plan in schedule 7	Source	Parameter	Limit (incl. Unit)	Reference period	Monitoring frequency	Monitoring standard or method
S1 emission to Yorkshire Water Blackburn Meadows Sewage Treatment Works	Treated process effluent from on-site effluent treatment plant	No parameters Set	No limit set	--	--	--

Schedule 4 – Reporting

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

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
--	--	--	--

Table S4.2: Annual production/treatment	
Parameter	Units
Total product produced	tonnes
Sandwich production	tonnes
Wrap production	tonnes
Effluent discharged	m ³

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	m ³
Energy usage – electricity	Annually	MWh
Energy usage – gas	Annually	MWh
Total raw material used	Annually	tonnes
NOx and CO emissions, as measured for boiler maintenance for boiler 1	Annually	--
NOx and CO emissions, as measured for boiler maintenance for boiler 2	Annually	--
Effluent Treatment Plant Sludge removed from site	Annually	tonnes
Category 3 animal by-products removed from site	Annually	tonnes
Refrigerant gas consumed (stated separately for each refrigerant used)	Annually	kg
Waste	Annually	tonnes
COD loss efficiency	Annually*	COD te/te product
Food waste	Annually	tonnes

*COD loss efficiency to be calculated on a weekly frequency, reported annually. Or equivalent calculation as agreed in writing by the Environment Agency.

Table S4.4 Reporting forms		
Parameter	Reporting form	Form version number and date
Water usage	Water Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Energy usage	Energy Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Food Waste	Food waste Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1 06/02/2023
Other performance parameters	Other Performance Parameters Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021

Schedule 5 – Notification

These pages outline the information that the Operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of Operator	
Location of Facility	
Time and date of the detection	

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

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

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

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

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

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

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the Operator

Schedule 6 – Interpretation

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

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

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

“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.

“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

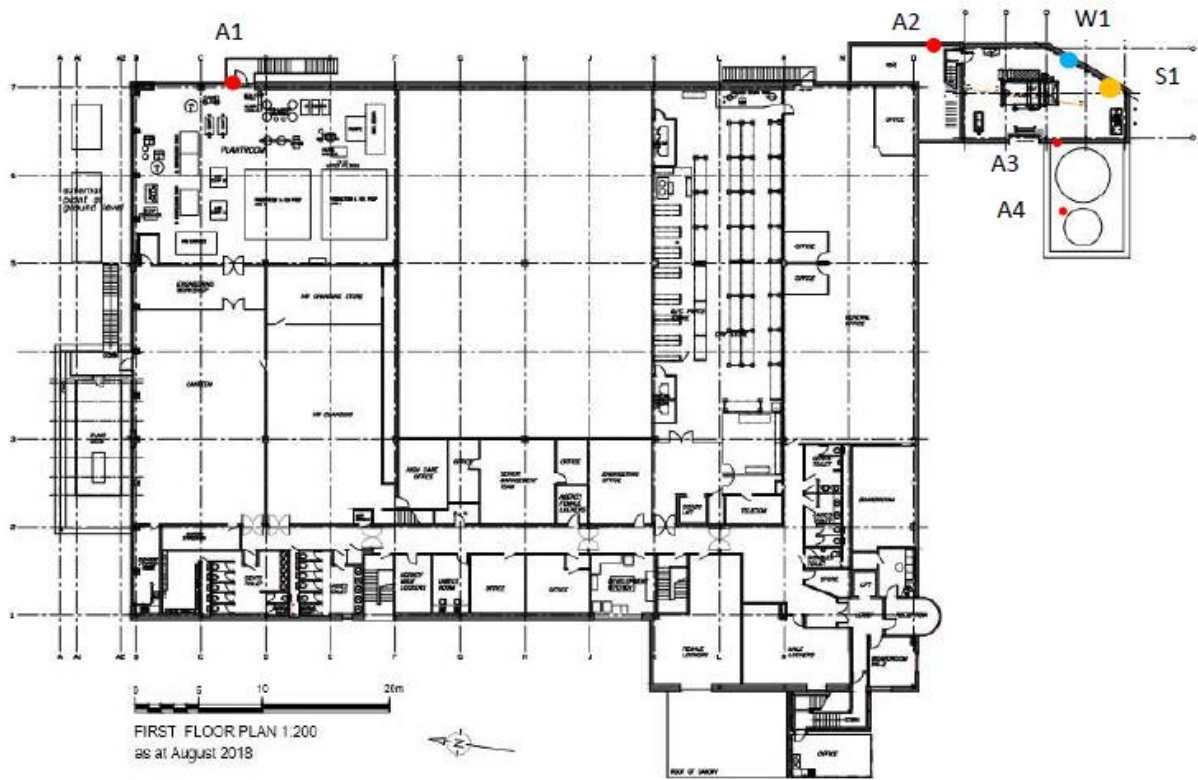
Installation boundary plan

Greencore Food to Go Ltd,
8 Willen Field Road, Park Royal,
London, NW10 7AQ.
Grid ref TQ 19983 83227
Site boundary shown in green

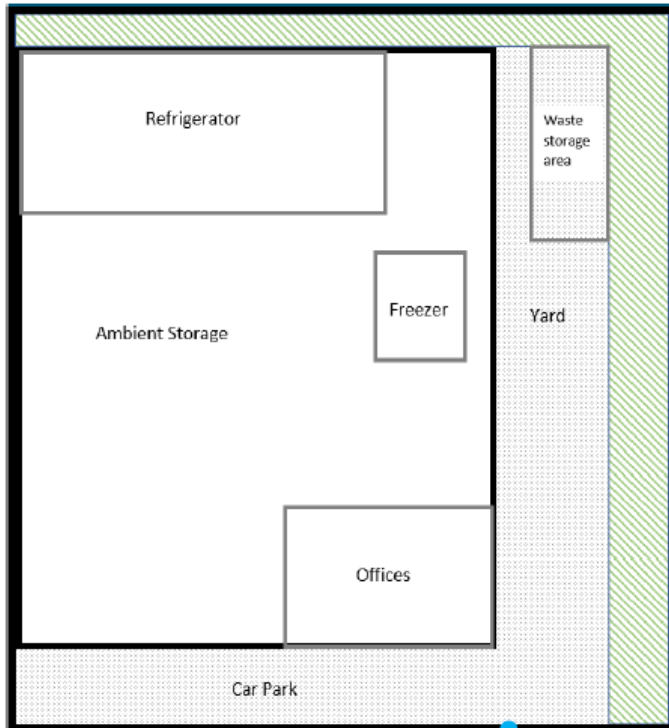


Site emission point plans

Factory 1



Factory 2



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END OF PERMIT

