Review of an Environmental Permit for an Installation subject to Chapter II of the Industrial Emissions Directive under the Environmental Permitting (England & Wales) Regulations 2016 (as amended)

Decision document recording our decision-making process following review of a permit

The Permit number is:	EPR/FP3131WE
The Operator is:	Cranswick Country Foods PLC
The Installation is:	Cranswick Country Foods (Lazenby's)
This Variation Notice number is:	EPR/FP3131WE/V003

What this document is about

Article 21(3) of the Industrial Emissions Directive (IED) requires the Environment Agency to review conditions in permits that it has issued and to ensure that the permit delivers compliance with relevant standards, within four years of the publication by the European Commission of updated decisions on best available techniques (BAT) Conclusions.

We have reviewed the permit for this installation against the BAT Conclusions for the Food, Drink and Milk Industries published on 4th December 2019 in the Official Journal of the European Union. In this decision document, we set out the reasoning for the consolidated variation notice that we have issued.

It explains how we have reviewed and considered the techniques used by the Operator in the operation and control of the plant and activities of the installation. It is our record of our decision-making process and shows how we have taken into account all relevant factors in reaching our position.

As well as considering the review of the operating techniques used by the Operator for the operation of the plant and activities of the installation, the consolidated variation notice takes into account and brings together in a single document all previous variations that relate to the original permit issue. Where this has not already been done, it also modernises the entire permit to reflect the conditions contained in our current generic permit template.

The introduction of new template conditions makes the Permit consistent with our current general approach and with other permits issued to Installations in this sector. Although the wording of some conditions has changed, while others have been deleted because of the new regulatory approach, it does not reduce the level of environmental protection achieved by the Permit in any way. In this document, we therefore address only our determination of substantive issues relating to the new BAT Conclusions.

We try to explain our decision as accurately, comprehensively and plainly as possible. Achieving all three objectives is not always easy, and we would welcome any feedback as to how we might improve our decision documents in future.

How this document is structured

1. Our decision
2. How we reached our decision
3. The legal framework
4. Annex 1 – Review of operating techniques within the Installation against BAT Conclusions.
5. Annex 2 – Review and assessment of changes that are not part of the BAT Conclusions derived permit review
6. Annex 3 – Improvement Conditions

1 Our decision

We have decided to issue the Variation Notice to the Operator. This will allow the Operator to continue to operate the Installation, subject to the conditions in the Consolidated Variation Notice that updates the whole permit.

We consider that, in reaching our decision, we have taken into account all relevant considerations and legal requirements and that the varied permit will ensure that a high level of protection is provided for the environment and human health.

The Consolidated Variation Notice contains many conditions taken from our standard Environmental Permit template including the relevant annexes. We developed these conditions in consultation with industry, having regard to the legal requirements of the Environmental Permitting Regulations and other relevant legislation. This document does not therefore include an explanation for these standard conditions. Where they are included in the Notice, we have considered the techniques identified by the Operator for the operation of their installation, and have accepted that the details are sufficient and satisfactory to make those standard conditions appropriate. This document does, however, provide an explanation of our use of "tailor-made" or installation-specific conditions, or where our Permit template provides two or more options.

2 How we reached our decision

2.1 Requesting information to demonstrate compliance with BAT Conclusion techniques

We issued a Notice under Regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 (a Regulation 61 Notice) on 01/08/2022 requiring the Operator to provide information to demonstrate where the operation of their installation currently meets, or how it will subsequently meet, the revised standards described in the relevant BAT Conclusions document.

The Notice required that where the revised standards are not currently met, the Operator should provide information that:

- describes the techniques that will be implemented before 4 December 2023, which will then ensure that operations meet the revised standards, or
- justifies why standards will not be met by 4 December 2023, and confirmation of the date when the operation of those processes will cease within the Installation or an explanation of why the revised BAT standards are not applicable to those processes, or
- justifies why an alternative technique will achieve the same level of environmental protection equivalent to the revised BAT standards described in the BAT Conclusions.

Where the Operator proposed that they were not intending to meet a BAT standard that also included a BAT Associated Emission Level (BAT-AEL) described in the BAT Conclusions Document, the Regulation 61 Notice required that the Operator make a formal request for derogation from compliance with that BAT-AEL (as provisioned by Article 15(4) of IED). In this circumstance, the Notice identified that any such request for derogation must be supported and justified by sufficient technical and commercial information that would enable us to determine acceptability of the derogation request.

The Regulation 61 Notice response from the Operator was received on 01/12/2022.

We considered it was in the correct form and contained sufficient information for us to begin our determination of the permit review but not that it necessarily contained all the information we would need to complete that determination.

The Operator made no claim for commercial confidentiality. We have not received any information in relation to the Regulation 61 Notice response that appears to be confidential in relation to any party.

2.2 Review of our own information in respect to the capability of the Installation to meet revised standards included in the BAT Conclusions document

Based on our records and previous experience in the regulation of the installation we consider that the Operator will be able to comply with the techniques and standards described in the BAT Conclusions other than for those techniques and requirements described in BAT Conclusion 11 and 12. In relation to these BAT Conclusions, we do not fully agree with the Operator in respect of their current stated capability as recorded in their response to the Regulation 61 Notice. We have therefore included Improvement Conditions IC5, IC6 and IC7 in the Consolidated Variation Notice to ensure that the requirements of the BAT Conclusions are delivered within 12 months of the variation being issued.

2.3 Requests for further information during determination

Although we were able to consider the Regulation 61 Notice response generally satisfactory at receipt, we did in fact need more information in order to complete our permit review assessment, and issued a further information request on 24/10/2024 relating to narrative BAT 1, 3, 7, 11 and 12, non-narrative BAT in relation to medium combustion plant (MCP) and climate change adaption, and site name. A copy of the further information request was placed on our public register.

3 The legal framework

The Consolidated Variation Notice will be issued under Regulations 18 and 20 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an *installation* as described by the IED;
- subject to aspects of other relevant legislation which also have to be addressed.

We consider that, in issuing the Consolidated Variation Notice, it will ensure that the operation of the Installation complies with all relevant legal requirements and that a high level of protection will be delivered for the environment and human health.

We explain how we have addressed specific statutory requirements more fully in the rest of this document.

Annex 1: decision checklist regarding relevant BAT Conclusions

BAT Conclusions for the Food, Drink and Milk Industries, were published by the European Commission on 4 December 2019.

There are 37 BAT Conclusions.

BAT 1 – 15 are General BAT Conclusions (Narrative BAT) applicable to all relevant Food, Drink and Milk Installations in scope.

BAT 16 – 37 are sector-specific BAT Conclusions, including Best Available Techniques Associated Emissions Levels (BAT-AELs) and Associated Environmental Performance Levels (BAT-AEPLs):

BAT 16 & 17	BAT Conclusions for Animal Feed
BAT 18 – 20	BAT Conclusions for Brewing
BAT 21 – 23	BAT Conclusions for Dairies
BAT 24	BAT Conclusions for Ethanol Production
BAT 25 & 26	BAT Conclusions for Fish and Shellfish Processing
BAT 27	BAT Conclusions for Fruit and Vegetable Processing
BAT 28	BAT Conclusions for Grain Milling
BAT 29	BAT Conclusions for Meat Processing
BAT 30 – 32	BAT Conclusions for Oilseed Processing and Vegetable Oil Refining
BAT 33	BAT Conclusions for Soft Drinks and Nectar/Fruit Juice Processed from Fruit and Vegetables
BAT 34	BAT Conclusions for Starch Production
BAT 35 – 37	BAT Conclusions for Sugar Manufacturing

This annex provides a record of decisions made in relation to each relevant BAT Conclusion applicable to the installation. This annex should be read in conjunction with the Consolidated Variation Notice.

The overall status of compliance with the BAT conclusion is indicated in the table as:

NA – Not Applicable
CC – Currently Compliant
FC – Compliant in the future (within 4 years of publication of BAT Conclusions)
NC – Not Compliant

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement
GENERAL BAT CONCLUSIONS (BAT 1-15)			
1	**Environmental Management System - Improve overall environmental performance.** Implement an EMS that incorporates all the features as described within BATc 1.	**CC**	The Operator has provided information to support compliance with BATc 1. We have assessed the information provided and we are satisfied that the Operator has demonstrated compliance with BATc 1. The Operator has a EMS externally accredited to the ISO14001 standard.
2	**EMS Inventory of inputs & outputs. Increase resource efficiency and reduce emissions.** Establish, maintain and regularly review (including when a significant change occurs) an inventory of water, energy and raw materials consumption as well as of waste water and waste gas streams, as part of the environmental management system (see BAT 1), that incorporates all of the features as detailed within the BATCs.	**CC**	The Operator has provided information to support compliance with BATc 2. We have assessed the information provided and we are satisfied that the Operator has demonstrated compliance with BATc 2. The Operator has a EMS externally accredited to the ISO14001 standard. The Operator declared: • The installation's site utility consumption is measured weekly and tracked through monthly submissions to groups. • Origin of emissions are tracked through the production process. • Six monthly medium combustion plant (MCP) monitoring. • Sub metering in place for water, gas, and electricity.
3	**Monitoring key process parameters at key locations for emissions to water.** For relevant emissions to water as identified by the inventory of waste water streams (see BAT 2), BAT is to monitor key process parameters (e.g. continuous monitoring of waste water flow, pH and temperature) at key locations (e.g. at the inlet and/or outlet of the pre-treatment, at the inlet to the final treatment, at the point where the emission leaves the installation).	**CC**	The Operator has provided information to support compliance with BATc 3. We have assessed the information provided and we are satisfied that the Operator has demonstrated compliance with BATc 3.

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement
			The Operator monitors pH, total suspended solids, chemical oxygen, temperature and demand (COD) which is reported monthly to the sewer authority, Yorkshire Water with limits set but the sewer authority. Daily waterflows are recorded at discharge points for the 'Gourmet Sausage Lazenby's' (80m^3) and Gourmet Kitchen (150m^3) with a combined daily effluent final discharge of 230m^3.
4	**Monitoring emissions to water to the required frequencies and standards.** BAT is to monitor emissions to water with at least the frequency given [refer to BAT 4 table in BATc] and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality.	**NA**	We are satisfied that BATc 4 is not applicable to this installation. BATc 4 is applicable only to installations discharging process effluent to surface water and this site discharges only to foul sewer under consent therefore, BATc 4 is not applicable.
5	**Monitoring channelled emissions to air to the required frequencies and standards.** BAT is to monitor channelled emissions to air with at least the frequency given and in accordance with EN standards.	**NA**	We are satisfied that BATc 5 is not applicable to this installation. This BATc is applicable to installations where dust emissions from processes such as drying, cooling, grinding, or milling are used. BATc 5 sets out air emissions monitoring requirements applicable to specific FDM sub-sectors. None of these monitoring requirements are applicable to this site as the activities undertaken (ready meal manufacture) are not specified in the sector and specific processes set out in BATc 5.
6	**Energy Efficiency** In order to increase energy efficiency, BAT is to use an energy efficiency plan (BAT 6a) and an appropriate combination of the common techniques listed in technique 6b within the table in the BATc.	**CC**	The Operator has provided information to support compliance with BATc 6. We have assessed the information provided and we are

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement
			satisfied that the operator has demonstrated compliance with BATc 6. The Operator is externally accredited to the ISO50001 standard which fulfils the requirement of BAT 6 technique 'a' - Energy efficiency plan. The Operator is currently using the following techniques: • All lighting replaced with LED lighting. • Solar power panel installation.
7	**Water and wastewater minimisation** In order to reduce water consumption and the volume of waste water discharged, BAT is to use BAT 7a and one or a combination of the techniques b to k given below. (a) water recycling and/or reuse (b) Optimisation of water flow (c) Optimisation of water nozzles and hoses (d) Segregation of water streams Techniques related to cleaning operations: (e) Dry cleaning (f) Pigging system for pipes (g) High-pressure cleaning (h) Optimisation of chemical dosing and water use in cleaning-in-place (CIP) (i) Low-pressure foam and/or gel cleaning (j) Optimised design and construction of equipment and process areas (k) Cleaning of equipment as soon as possible	**CC**	The Operator has provided information to support compliance with BATc 7. We have assessed the information provided and we are satisfied that the Operator has demonstrated compliance with BATc 7. The Operator is using the following techniques: (a) Water recycling and reuse – The Operator currently recycled using the tote bin washer. There are three zones to the asset – zone 1 being the 'dirty' end and zone 3 being the 'clean' end. Water used in zone 3 (where there is no debris remaining on the tote bins) is recycled back into zone 1 for first stage cleaning. (c) Optimisation of water nozzles and hoses – Water saving spray guns are installed across the site. (g) High pressure cleaning. (h) Optimisation of chemical dosing and water use in cleaning-in-place (CIP) – Third-party supplier management systems doses accurate

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement
			ratios chemical and water applicable to the activity, this is present in both factories. CIP cycles set by equipment manufacturer. (j) Optimised design and construction of equipment and process areas - Full scope of factory cleaning requirements by third-party leading experts prior to any install with water maximisation and efficiency in mind. (k) – Cleaning of equipment as soon as possible – to prevent wastes hardening.
8	**Prevent or reduce the use of harmful substances** In order to prevent or reduce the use of harmful substances, e.g. in cleaning and disinfection, BAT is to use one or a combination of the techniques given below. (a) Proper selection of cleaning chemicals and/or disinfectants (b) Reuse of cleaning chemicals in cleaning-in-place (CIP) (c) Dry cleaning (d) Optimised design and construction of equipment and process areas	**CC**	The Operator has provided information to support compliance with BATc 8. We have assessed the information provided and we are satisfied that the Operator has demonstrated compliance with BATc 8. The Operator is using the following techniques: (a) Proper selection of cleaning chemicals and/or disinfectants – The site has a contract with a third-party organisation, who provide the Operator with guidance on solutions for cleaning chemicals, and providing industry standard solutions for the cleaning needs of the food processing sector. (b) Optimised design and construction of equipment and process areas – Dosing system in place for efficient use of chemicals.
9	**Refrigerants** In order to prevent emissions of ozone-depleting substances and of substances with a high global warming potential from cooling and freezing, BAT is to use refrigerants without ozone depletion potential and with a low global warming potential.	**CC**	The Operator has provided information to support compliance with BATc 9. We have assessed the information provided and we are satisfied that the Operator has demonstrated compliance with BATc 9.

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement
			All refrigeration on-site uses an Ammonia Glycol based system which has zero global warming potential (GWP).
10	**Resource efficiency** In order to increase resource efficiency, BAT is to use one or a combination of the techniques given below: (a) Anaerobic digestion (b) Use of residues (c) Separation of residues (d) Recovery and reuse of residues from the pasteuriser (e) Phosphorus recovery as struvite (f) Use of waste water for land spreading	**CC**	The Operator has provided information to support compliance with BATc 10. We have assessed the information provided and we are satisfied that the Operator has demonstrated compliance with BATc 10. The Operator is using the following techniques: (a) Anaerobic digestion (AD) – All non-edible food waste from on-site is sent for disposal to an off-site anaerobic digester. The Operator despatches food waste that can be classed as surplus and edible to third-parties to minimise waste.
11	**Waste water buffer storage** In order to prevent uncontrolled emissions to water, BAT is to provide an appropriate buffer storage capacity for waste water.	**FC**	The Operator has provided information to support compliance with BATc 11. We have assessed the information provided and we are not satisfied that the Operator has demonstrated compliance with BATc 11. The Operator should have sufficient buffer storage capacity to minimize any uncontrolled emissions to water and/or sewer. The Operator is required to complete a feasibility study on installing appropriate buffer storage. The Operator declared: • The on-site ‘fat tank’ and grease grabber act to prevent inappropriate emission to water which go through interceptors.

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement
			• The Operator has a third-party arrangement in which untreated effluent is tankered off-site within a 3 hour time frame in the event of an emergency. The Operator has no effluent buffer storage on-site available to hold back effluent in the event that effluent could/should not be discharged to sewer, or to prevent contaminated effluent from entering sewer in an emergency. Improvement condition IC5 has been included in the permit to achieve compliance with BATc 11. Improvement condition IC6 has been included for the Operator to undertake a feasibility study on installing appropriate buffer capacity. (see Annex 3).
12	**Emissions to water – treatment** In order to reduce emissions to water, BAT is to use an appropriate combination of the techniques given below. Preliminary, primary and general treatment (a) Equalisation (b) Neutralisation (c) Physical separate (eg screens, sieves, primary settlement tanks etc) Aerobic and/or anaerobic treatment (secondary treatment) (d) Aerobic and/or anaerobic treatment (eg activated sludge, aerobic lagoon etc) (e) Nitification and/or denitrification (f) Partial nitration - anaerobic ammonium oxidation Phosphorus recovery and/or removal (g) Phosphorus recovery as struvite (h) Precipitation	**FC**	The Operator has provided information to support compliance with BATc 12. We have assessed the information provided and we are not satisfied that the Operator has demonstrated compliance with BATc 12. The site discharge processes effluent via a ‘fat tank’ which goes through interceptors to capture waste fat. The captured fats contained in intermediate bulk containers and taken off-site for use in a third-party AD plant. The operator is required to complete a feasibility study on installing effluent treatment including a review of treatment options available along with their associated benefits.

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement
	(i) Enhanced biological phosphorus removal Final solids removal (j) Coagulation and flocculation (k) Sedimentation (l) Filtration (eg sand filtration, microfiltration, ultrafiltration) (m) Flotation		We consider that the Operator will be future compliant with BATc 12. Improvement conditions IC5 has been included in the permit to achieve compliance. Additionally, IC7 has been included for the Operator to undertake a feasibility study on installing effluent treatment. (see Annex 3).
12	**Emissions to water – treatment** **BAT-associated emission levels (BAT-AELs) for direct emissions to a receiving water body** Parameter | BAT-AEL (1) (2) (daily average) Chemical oxygen demand (COD) (3) (4) | 25-100 mg/l (5) Total suspended solids (TSS) | 4-50 mg/l (6) Total nitrogen (TN) | 2-20 mg/l (7) (8) Total phosphorus (TP) | 0,2-2 mg/l (9)	**NA**	We are satisfied that BATc 12 AEL is not applicable to this installation. BATc 12 AEL is applicable only to installations discharging process effluent to surface water and this site discharges only to foul sewer under consent therefore, BATc 12 AEL is not applicable.
13	**Noise management plan** In order to prevent or, where that is not practicable, to reduce noise emissions, BAT is to set up, implement and regularly review a noise management plan, as part of the environmental management system (see BAT 1), that includes all of the following elements: - a protocol containing actions and timelines; - a protocol for conducting noise emissions monitoring; - a protocol for response to identified noise events, eg complaints; - a noise reduction programme designed to identify the source(s), to measure/estimate noise and vibration exposure, to characterise the contributions of the sources and to implement prevention and/or reduction measures.	**NA**	We are satisfied that BATc 13 is not applicable to this installation. BATc 13 is only applicable to cases where noise nuisance at sensitive receptors is expected and/or has been substantiated.
14	**Noise management** In order to prevent or, where that is not practicable, to reduce noise emissions, BAT is to use one or a combination of the techniques given below. (a) Appropriate location of equipment and buildings	**CC**	The Operator has provided information to support compliance with BATc 14. We have assessed the information provided and we are satisfied that the Operator has demonstrated compliance with BATc 14.

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement
	(b) Operational measures (c) Low-noise equipment (d) Noise control equipment (e) Noise abatement		The Operator is using the following techniques: (a) appropriate location of equipment and buildings – The site is surrounded by other industrial buildings on a dedicated industrial site away from potential sensitive receptors. All process activities take place in a closed buildings.
15	**Odour Management** In order to prevent or, where that is not practicable, to reduce odour emissions, BAT is to set up, implement and regularly review an odour management plan, as part of the environmental management system (see BAT 1), that includes all of the following elements: - a protocol containing actions and timelines; - a protocol for conducting odour monitoring. - a protocol for response to identified odour incidents eg complaints; - an odour prevention and reduction programme designed to identify the source(s); to measure/estimate odour exposure: to characterise the contributions of the sources; and to implement prevention and/or reduction measures.	**NA**	We are satisfied that BATc 15 is not applicable to this Installation. BATc 15 is only applicable to cases where an odour nuisance at sensitive receptors is expected and/or has been substantiated. The site has not had any historic issues associated with odour. While not formally approved by the EA, the operator does have an internal odour management plan in place.
Meat Processing sector BAT conclusions			
29	**Emissions to air – Meat Processing sector** In order to reduce channelled emissions of organic compounds to air from meat smoking, BAT is to use one or a combination of the techniques given below. a) Adsorption b) Thermal oxidation c) Wet scrubber d) Use of purified smoke	**NA**	We are satisfied that BATc 29 is not applicable to this Installation. This BATc is concerned with sites that smoke meats during their process. This installation does not undertake any smoking of meats, and as such BATc 29 is not applicable.

<table>
<tr><th>BATC No.</th><th>Summary of BAT Conclusion requirement for Food, Drink and Milk Industries</th><th>Status
NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th></tr>
<tr><td>29</td><td>Emission to air – AEL

Table 18

BAT-associated emission level (BAT-AEL) for channelled TVOC emissions to air from a smoke chamber

<table>
<tr><th>Parameter</th><th>Unit</th><th>BAT-AEL
(average over the sampling period)</th></tr>
<tr><td>TVOC</td><td>mg/Nm³</td><td>3-50 (1) (2)</td></tr>
</table>
(1) The lower end of the range is typically achieved when using adsorption or thermal oxidation.
(2) The BAT-AEL does not apply when the TVOC emission load is below 500 g/h.</td><td>NA</td><td>We are satisfied that BATc 29-AELs are not applicable to this Installation.

These BAT-AELs are concerned with sites that smoke meats during their process. This installation does not undertake any smoking of meats, and as such BATc 29-AELs are not applicable.</td></tr>
<tr><td colspan="4">Meat Processing Sector Environmental Performance Levels</td></tr>
<tr><td>EPL</td><td>Environmental Performance Level – Specific energy consumption for the Meat Processing sub-sector

Table 16

Indicative environmental performance level for specific energy consumption

<table>
<tr><th>Unit</th><th>Specific energy consumption
(yearly average)</th></tr>
<tr><td>MWh/tonne of raw materials</td><td>0,25-2,6 (1) (2)</td></tr>
</table>
(1) The specific energy consumption level does not apply to the production of ready meals and soups.
(2) The upper end of the range may not apply in the case of a high percentage of cooked products.</td><td>CC</td><td>The operator has provided information to support compliance with the EPL. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with the EPL for energy consumption.

The operator has stated an energy consumption of 0.227 MWth/tonne of raw material for the ‘Lazenby’ production area of the site and as such fall within the guidelines set out in the BAT conclusions.

The ‘Gourmet Kitchen’ production area of the site is out of range due to the high levels of energy required during short time frames of product commissioning and the low level of product sold in the early months of the year as such the annual average of 15.27 MWth is taken from a short time-frame and not from a consistent annual process.</td></tr>
<tr><td>EPL</td><td>Environmental Performance Level – Specific waste water discharge for the Meat Processing sub-sector</td><td>CC</td><td>The operator has provided information to support compliance with the EPL. We have</td></tr>
</table>

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement
	Table 17 **Indicative environmental performance level for specific waste water discharge** Unit: Specific waste water discharge(yearly average) m^3/tonne of raw materials: 1,5-8,0 (1) (1) The specific waste water discharge level does not apply to processes using direct water cooling and to the production of ready meals and soups.		assessed the information provided and we are satisfied that the operator has demonstrated compliance with the EPL for specific waste water discharge. The operator has stated a specific waste water discharge of 1.7670 m^3/tonne of raw product for the 'Lazenby' production area of the site and as such fall within the guidelines set out in the BAT conclusions. The 'Gourmet Kitchen' production area of the site is out of range due to the high levels of energy required during short time frames of product commissioning and the low level of product sold in the early months of the year as such the annual average of 89.816 m^3/tonnes is taken from a short time-frame and not from a consistent annual process.

Annex 2: Review and assessment of changes that are not part of the BAT Conclusions derived permit review

Updating permit during permit review consolidation

- Table S1.1 overhaul
    - Activity Reference (AR) renumbering
    - Updated listed activities
    - Addition of production capacity
    - Directly associated activities (DAAs) standardisation

We have updated permit conditions to those in the current generic permit template as a part of permit consolidation. The conditions will provide the same level of protection as those in the previous permit.

Production/Capacity Threshold

The Environment Agency is looking to draw a “line in the sand” for permitted production capacity; a common understanding between the Operator and regulator for the emissions associated with a (maximum) level of production, whereby the maximum emissions have been demonstrated as causing no significant environmental impact.

We have included a permitted production level (capacity) within table S1.1 of the permit for the section 6.8 listed activity and we need to be confident that the level of emissions associated with this production level have been demonstrated to be acceptable.

The Operator has completed a H1 assessment of emissions for typical figures of production at the time of permitting.

The existing H1 assessment of particulate emissions to air remains valid for the revised capacity threshold now placed within table S1.1 of the permit.

Emissions to Air

We asked the Operator to list all emission points to air from the installation in the Regulation 61 notice. And to provide a site plan indicating the locations of all air emission points.

The Operator has provided an up to date air emission plan.

Implementing the requirements of the Medium Combustion Plant Directive

We asked the Operator to provide information on all combustion plant on site in the Regulation 61 Notice as follows:

- Number of combustion plant (CHP engines, back-up generators, boilers);
- Size of combustion plant – rated thermal input (MWth)
- Date each combustion plant came into operation

The Operator provided the information in the table below:

Boilers

1. Rated thermal input (MW) of the medium combustion plant.	3.6 MWth
2. Type of the medium combustion plant (diesel engine, gas turbine, dual fuel engine, other engine or other medium combustion plant).	Gas fired engine
3. Type and share of fuels used according to the fuel categories laid down in Annex II.	Natural gas
4. Date of the start of the operation of the medium combustion plant or, where the exact date of the start of the operation is unknown, proof of the fact that the operation started before 20 December 2018.	December 2020

We have reviewed the information provided and we consider that the declared combustion plant qualify as “new” medium combustion plant.

We have retained the appropriate emission limit values for new medium combustion plant as part of this permit review. See Table S3.1 in the permit. We have also included a new condition 3.1.4 within the permit which specifies the monitoring requirements for the combustion plant in accordance with the MCPD.

The natural gas fired engine was permitted as new under EPR/FP3131WE/V002 issued in January 2021. This variation however detailed the thermal power incorrectly stating is to be 2.9MWth. We have amended it to 3.6MWth. We have retained emission limit values and monitoring for emission point A4, activity AR2 (2.9 MWth, former activity ‘A7’ which was later clarified to be 3.6 MWth from this variation’s RFI response). The original MWth rating was based on incorrect data. In building a request for information (RFI) response sent by the Environment Agency 24/10/2024, the Operator clarified the boiler MWth in discussions with the boiler manufacturer. It came to light that the thermal had an output of 3,134 kW. Therefore, the Operator made the calculation assuming 85% efficiency without an economiser, that the thermal input would be 3,605 kW.

Emissions to Water and implementing the requirements of the Water Framework Directive

We asked the Operator to provide information on all emissions to water at the installation in the Regulation 61 Notice as follows;

- Identify any effluents which discharge directly to surface or groundwater;
- Provide an assessment of volume and quality, including results of any monitoring data available;
- and for any discharges to water / soakaway whether a recent assessment of the feasibility of connection to sewer has been carried out.

The Operator has previously provided assessments for all emissions to water at the installation. The Operator declares there has been no change to activities and subsequent effluents generated at the installation since this risk assessment was taken. Consequently, we agree that the original risk assessments remain valid at this time.

Soil & groundwater risk assessment (baseline report)

The IED requires that the Operator of any IED installation using, producing or releasing "relevant hazardous substances" (RHS) shall, having regarded the possibility that they might cause pollution of soil and groundwater, submit a "baseline report" with its permit application. The baseline report is an important reference document in the assessment of contamination that might arise during the operational lifetime of the regulated facility and at cessation of activities. It must enable a quantified comparison to be made between the baseline and the state of the site at surrender.

At the definitive cessation of activities, the Operator has to satisfy us that the necessary measures have been taken so that the site ceases to pose a risk to soil or groundwater, taking into account both the baseline conditions and the site's current or approved future use. To do this, the Operator has to submit a surrender application to us, which we will not grant unless and until we are satisfied that these requirements have been met.

The Operator submitted a site condition report '*JDA/155/AT/TBA1 October 2014'* during the original application received on *12/12/2014*. Additionally, an updated site condition report '*Site condition-baseline report C2.5b SCBR - July 2020*' was received on *01/12/2022*. The site condition report included a report on the baseline conditions as required by Article 22. We reviewed that report and considered that it adequately described the condition of the soil and groundwater at those time.

The Operator submitted a summary report which referenced the site condition report and baseline report. We have reviewed the information and we consider that it adequately describes the current condition of the soil and groundwater. Consequently, we are satisfied that the baseline conditions have not changed.

Hazardous Substances

Hazardous substances are those defined in Article 3 of Regulation (EC) No. 1272/2008 on classification, labelling and packaging of substances and mixtures

The Operator has confirmed there has been no change in the hazardous substances used, their capability of causing pollution and/or the pollution prevention measures at the installation since the risk assessment was submitted on 01/12/2022
Consequently, we are satisfied there has been no change to the assessment of risk for hazardous substances.

Climate Change Adaptation

The Operator has considered if the site is at risk of impacts from adverse weather (flooding, unavailability of land for land spreading, prolonged dry weather / drought) .

The Operator has identified the installation as likely to be or has been affected by flooding and drought, which we consider to be a severe weather event.

The Operator has submitted a climate change adaptation plan, which considers, as a minimum the impact of severe weather on the operations within the installation.

We consider the climate change adaptation plan to be appropriate for the installation.

Containment

We asked the Operator vis the Regulation 61 Notice to provide details of the each above ground tanks which contain potentially polluting liquids at the site, including tanks associated with the effluent treatment process where appliable.

The Operator provided of all tanks;

- Tank reference/name
- Contents details
- Capacity (litres)
- Location
- Construction material(s) of each tank
- The bunding specification including
    - Whether the tank is bunded
    - If the bund is shared with other tanks
    - The capacity of the bund
    - The bund capacity as % of tank capacity
    - Construction material of the bund
    - Whether the bund has a drain point
    - Whether any pipes penetrate the bund wall
- Details of overfill prevention
- Drainage arrangements outside of bunded areas
- Tank filling/emptying mitigation measures (drips/splashes)
- Leak detection measures
- Details of when last bund integrity test was carried out
- Maintenance measures in place for tank and bund (inspections)
- How the bund is emptied
- Details of tertiary containment

and whether the onsite tanks currently meet the relevant standard in the Ciria "Containment systems for the prevention of pollution (C736)" report.

We reviewed the information provided by the Operator and their findings. We are not satisfied that the existing tanks and containment measures on site meet the standards set out in CIRIA C736.

We have set improvement conditions in the permit to address the deficiencies in the existing tanks and containment measures on-site (IC8). See Improvement conditions in Annex 3 of this decision document.

Annex 3: Improvement Conditions

Based on the information in the Operator's Regulation 61 Notice response and our own records of the capability and performance of the installation at this site, we consider that we need to set improvement conditions so that the outcome of the techniques detailed in the BAT Conclusions are achieved by the installation. These improvement conditions are set out below - justifications for them is provided at the relevant section of the decision document (Annex 1 or Annex 2).

Previous improvement conditions marked as complete in the previous permit.

Superseded Improvement Conditions – Removed from permit as marked as "complete"	
Reference	**Improvement Condition**
IC1	The Operator shall undertake an assessment of the options available for effluent quantity and quality sub metering measures on site. A written report summarising the findings shall be submitted to the Environment Agency. A timescale for implementation of any improvements shall be agreed with the Environment Agency in writing.
IC2	The Operator shall identify all refrigeration systems on site, the refrigerant type and inventory in each system, and the leak detection equipment present on each system. For refrigeration systems on which leak detection equipment is not already present the operator shall identify measures for installation of leak detection equipment. A written report summarising the findings shall be submitted to the Environment Agency. A timescale for implementation of any improvements shall be agreed with the Environment Agency in writing.
IC3	The Operator shall report to the Agency at least two weeks before the end of the temporary water discharge consent (end date 30/04/2021) from Yorkshire Water Services Ltd for Cranswick Country Foods Ltd, Helsinki Road, Hull on the progress made towards obtaining a permanent consent for the site.
IC4	The Operator shall provide written evidence by certification of their environmental management system by an independently accredited body under ISO14001.

The following improvement conditions have added to the permit as a result of the variation.

Improvement programme requirements		
Reference	**Reason for inclusion**	**Justification of deadline**
IC5	The operator shall confirm, achievement of the 'Narrative' BAT conclusions as identified in the Food, Drink and Milk Bref published on 4 December 2019 where BAT is currently not demonstrated or achieved with respect to BATc 11, & 12. Refer to BAT Conclusions for a full description of the BAT requirement.	3 months from date of permit issue or as agreed in writing by the Environment Agency 16/03/2025
IC6	The Operator shall undertake a survey of the waste water buffer storage at the site and review measures against relevant standard including: The operator shall submit a written report that meets the Narrative BAT requirements for the BAT Conclusions for Food, Drink and Milk Industries with respect to BAT 11, to the Environment Agency for approval, outlining the results of the survey and the review of feasibility of options and provide details of: • current containment measures • improvements proposed • time scale for implementation of improvements. The operator shall implement the proposed improvements in line with the timescales agreed by the Environment Agency.	12 months from date of permit issue or as agreed in writing by the Environment Agency 16/12/2025
IC7	The Operator shall submit a written report to the Environment Agency for technical assessment and approval on the feasibility of installing effluent treatment and include a review of treatment options available along with their associated benefits. Justification is required where no on-site treatment is provided, taking into account the nature of the wastewater and any subsequent off-site treatment. In addition the report needs to consider the appropriate on-site monitoring of the effluent stream prior to disposal. (BAT 3, 4 and 12 Best Available Techniques Reference Document and BAT Conclusions document for the food, drink and milk industry dated December 2019).	12 months from date of permit issue or as agreed in writing by the Environment Agency: 16/12/2025

IC8	The Operator shall undertake a survey of the primary, secondary and tertiary containment at the site and review measures against relevant standard including: • CIRIA Containment systems for the prevention of pollution (C736) – Secondary, tertiary and other measures for industrial and commercial premises, • EEMUA 159 - Above ground flat bottomed storage tanks • The operator shall submit a written report to the Environment Agency approval which outlines the results of the survey and the review of standard and provide details of • current containment measures • any deficiencies identified in comparison to relevant standards, • improvements proposed • time scale for implementation of improvements. The operator shall implement the proposed improvements in line with the timescales agreed by the Environment Agency.	12 months from date of permit issue or as agreed in writing by the Environment Agency: 16/12/2025