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Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Greencore Food To Go Limited

Greencore Food To Go Ltd Northampton 15-17 Deer Park Road Northampton Northamptonshire NN3 6RX

Variation application number

EPR/PP3730VH/V004

Permit number

EPR/PP3730VH

Greencore Food To Go Ltd Northampton Permit number EPR/PP3730VH

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 Ltd Northampton, operated by Greencore Food To Go Limited is located within the Moulton Park Business Centre located roughly north east in the outskirts of Northampton at national grid reference SP 77240 64880. The surrounding area consist of an industrial estate and offices. The A5076 runs around the site at the North point with offices across the road. Offices and garages can be found to the immediate east of the site with the closest sensitive receptor roughly 180 metres away. Other industrial warehouses and sites are located to the south and west of the site.

The facility has 24 Production lines, that produces circa 170million products per annum ranging from sandwiches, sandwich fillings, vegetable snacks, wraps, toasties & rolls, deli fillers and similar snacking and salads products. All products are made and despatched daily. The factory assembles food and some food is cooked/toasted on-site.

The Environmental Permit is for the following scheduled activity:

Section 6.8 A(1)(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, or where 'A' is the portion of animal material in percent of weight of the finished product production capacity.

There is also an additional scheduled activity:

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

There is a chilled production area where food is either washed, prepped, or cooked or prepared. Other materials will be sieved and passed through into production. All ingredients are sealed are passed through a sanitiser tunnel which sprays sanitiser onto product on a conveyer belt. Alternatively, toastie products that require toasting after manufacturing are toasted through a travelling oven inside of Unit A. There are also salad wash facilities and a manual check on some items to ensure the products are delivered and meet specification.

After manufacturing some ingredients are placed into a blast chiller to enable them to be prepared into a product at the right temperature. The raw materials are then assembled using a number of assembly lines in high care. A number of depositor machine are used to deposit fillings into their containers or onto products they will then have other raw materials added to them dependant on product type. They will then be either flow wrapped, bag sealing or go through a skillet sealing machines to package the products. The products then pass through a metal detector before being stacked into trays and despatched. The production areas are cleaned continually and there is a deep clean period in each day.

The key point source emissions to air are from three natural gas fired steam boilers, two natural gas fired central heating boilers, eleven natural gas fired hot water boilers and two ovens. All combustion plants are under 1MWth.

There is an effluent treatment plant to treat waste water before discharge to an off-site waste water treatment plant under a trade effluent consent with Anglian Water. The effluent treatment plant comprises of a balance tank, sludge collection tank, a chemical storage area for coagulant and flocculant and a Dissolved Air Flotation (DAF) tank. Effluent is screened to remove solids then deposited in a balance tank. The effluent is then pumped to a DAF tank where a coagulant and a flocculant is used to reduce the suspended solids, reduce the fats, oil and grease, sulphate and chemical oxygen demand before the effluent is discharged to the foul sewer. Effluent sludge is pumped from the DAF tank to the sludge tank where it is stored until it is removed for off-site treatment.

The facility is operated under an environmental management system.

There are six European statutory sites withing 10km of the site which consist of three RAMSAR sites and three special protection areas (SPAs) which are all part of the Upper Nene Valley Gravel Pits. There are four local nature reserves and six local wildlife sites within 2km of 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 EPR/PP3730VH/A001	Duly made 10/10/2014	Application for a food and drink facility to make chilled products such as sandwiches.		
Permit determined EPR/PP3730VH	19/12/2014	Permit issued to Greencore Food To Go Limited.		
Application EPR/PP3730VH/V002 (variation and consolidation)	Duly made 21/10/2015	Application to extend the permitted boundary to include a new manufacturing unit for the production of chilled food products.		
Response to Schedule 5 request for further information dated 01/12/2015 EPR/PP3730VH	14/12/2015	Confirmation of process water discharge volumes revised OMP and updated general emissions documents.		
E-mail providing further information. EPR/PP3730VH	22/12/2015	Confirmation of waste storage techniques.		
Variation determined EPR/PP3730VH/V002	28/01/2016	Varied and consolidated permit issued.		
Notified of change of Registered Office address EPR/PP3730VH/V003	10/08/2020	Registered Office address changed to Greencore Manton Wood, Retford Road, Manton Wood Enterprise Park, Worksop, S80 2RS.		

Status log of the permit				
Description	Date	Comments		
Variation issued EPR/PP3730VH	15/09/2020	Varies permit issued to Greencore Food To Go Limited.		
Application EPR/PP3730VH/V004 (variation and consolidation)	Regulation 61 Notice response received 02/02/2023	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.		
Response to request for information dated 11/11/2024	Received 26/11/2024	Information requested in relation to Reg.61 response tool concerning BATc 6, 9 and non-narrative BAT in relation to production/capacity threshold, emissions to air, medium combustion plant (MCP), relevant hazardous substances (RHS), climate change adaptation, containment and site name.		
Variation determined and consolidation issued EPR/PP3730VH	17/12/2024	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/PP3730VH

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 Ltd Northampton 15-17 Deer Park Road Northampton Northamptonshire NN3 6RX

to the extent set out in the schedules.

The notice shall take effect from 17/12/2024

Name	Date
Denise Horton	17/12/2024

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/PP3730VH

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/PP3730VH/V004 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 Ltd Northampton 15-17 Deer Park Road Northampton Northamptonshire NN3 6RX

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

Name	Date
Denise Horton	17/12/2024

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:
 - in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the Operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.2 Energy efficiency

- 1.2.1 The Operator shall:
 - (a) take appropriate measures to ensure that energy is used efficiently in the activities;
 - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
 - (c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

- 1.3.1 The Operator shall:
 - (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities:
 - (b) maintain records of raw materials and water used in the activities;
 - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
 - (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The Operator shall take appropriate measures to ensure that:
 - (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
 - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
 - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.
- 1.4.2 The Operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

2.1.1 The Operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities").

2.2 The site

2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

2.3 Operating techniques

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the Operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation ("plan") specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.4 The Operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
 - (a) the nature of the process producing the waste;
 - (b) the composition of the waste;
 - (c) the handling requirements of the waste;
 - (d) the hazardous property associated with the waste, if applicable; and
 - (e) the waste code of the waste.

2.4 Improvement programme

- 2.4.1 The Operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.
- 2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the Operator shall notify the Environment Agency within 14 days of completion of each improvement.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1, S3.2 and S3.3.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.

3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

3.2 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 ac	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 animal and vegetable materials to production of finished sandwiches and ready to eat product including storage and dispatch offsite. Production capacity is limited to 94 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. Treatment of on-site generated process effluent in a DAF plant treatment system.	From generation of waste water to discharge to foul sewer.			
Directly Asso	ciated Activity	System.				
AR3	Steam and hot water supply	x3 natural gas fired steam boilers (A01, B01 and B02), x2 natural gas fired central heating boilers (A31 and B16), and x11 natural gas fired hot water boilers (A02 – A06, B03 – B06 and D01(x2)). Each boiler is less than 1MWth.	From receipt of fuel to release of products of combustion to air.			
AR4	Use of ovens	x2 natural gas fired ovens (A24 and A25), one continuous tunnel oven (in two zones) each with a thermal input capacity of 0.55MWth each.	From receipt of fuel to release of products of combustion to air.			

Table S1.1 activ	Table S1.1 activities				
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity		
AR5	Raw material storage and handling	Storage and handling of raw materials at the installation.	From receipt of raw materials to dispatch of final product.		
AR6	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.		
AR7	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.		
AR8	Waste storage and handling	Storage and handling of waste materials.	From generation of waste to storage pending removal for disposal or recovery.		
AR9	Discharges to controlled waters	Surface water discharge to controlled waters.	From collection of uncontaminated surface water to discharge to Warren Spinney.		

Table S1.2 Operating techniques				
Description	Parts	Date Received 10/10/2014		
Application	Part B2 and B3 of the application and supporting documents.			
Application	Odour management plan reference GCN-OMP dated 04/09/2014.	10/10/2014		
Application	Response to request for more information including details of measures taken to prevent failure of tanks in the effluent treatment plant.	06/11/2014		
Application	Response to request for more information including details of the tank containment and incident prevention measures.	01/12/2014		
Variation Application EPR/PP3730VH/V002	The response to questions in section 3, form EPC – Part C3 of the application form and Sections GCN-VAR01-CAP, GCN-VAR01-NTS, GCN-VAR01-BAT and GCN-VAR01-ODO of the application document.	21/10/2015		
Response to Schedule 5 request for further information dated 01/12/2015	Response to Questions 1, 3. 4. 5. Including revised documents GCN-VAR01-EMI and GCN-VAR01-ODO Version 2.	14/12/2015		
E-mail containing further information.	Confirmation of waste storage techniques.	22/12/2015		
Regulation 61 (1) Notice – Responses to questions dated 04/10/2022	All parts	Received 02/02/2023		
Regulation 61(1) Notice – request for further information dated 11/11/2024	Information requested in relation to Reg.61 response tool concerning BATc 6, 9 and non-narrative BAT in relation to production/capacity threshold, emissions to air, medium combustion plant (MCP), relevant hazardous substances	Received 26/11/2024		

Table S1.2 Operating techniques			
Description Parts Date Received			
	(RHS), climate change adaptation, containment and site name.		

Reference	Requirement	Date
IC3	The operator shall use refrigerants without ozone depletion potential and with a low global warming potential (GWP) in accordance with BAT 9 from the Food, Drink and Milk Industries BATCs.	3 months from date of issue or as agreed in writing by the
	To demonstrate compliance against BAT 9, the operator shall produce a plan for the onsite refrigerant system(s) at the installation. The plan is to be assessed by the Environment Agency and shall be incorporated within the existing environmental management system.	Environment Agency 17/03/2025
	The plan should include, but not be limited to, the following:	
	 Where practicable, retro filling systems containing high GWP refrigerants e.g. R-404A with lower GWP alternatives as soon as possible. 	
	 An action log with timescales, for replacement of end-of-life equipment using refrigerants with the lowest practicable GWP. 	
IC4	The operator shall produce a monitoring plan detailing how the management of relevant hazardous substances which did not screen out as low risk, based on the RHS baseline assessment, will be maintained and monitored to mitigate the risks of pollution. The plan shall be submitted for approval.	12 months from date of issue or as agreed in writing by the
	The plan shall be implemented in accordance with the Environment Agency's written approval, including timescales to undertake any infrastructure improvements.	Environment Agency 17/12/2025
IC5	The operator shall produce a climate change adaptation plan, which will form part of the EMS.	12 months from date of
	The plan shall include, but not be limited to:	issue or as
	 Details of how the installation has or could be affected by severe weather; 	agreed in writing by the
	 The scale of the impact of severe weather on the operations within the installation; 	Environment Agency
	An action plan and timetable for any improvements to be made to minimise the impact of severe weather at the installation.	17/12/2025
	The Operator shall implement any necessary improvements to a timetable agreed in writing with the Environment Agency.	
IC6	The Operator shall undertake a survey of the primary, secondary and tertiary containment at the site and review measures against relevant standard including:	12 months from date of issue or as
	 CIRIA Containment systems for the prevention of pollution (C736) Secondary, tertiary and other measures for industrial and commercial premises, 	agreed in writing by the Environment
	EEMUA 159 - Above ground flat bottomed storage tanks	Agency 17/12/2025

Reference	Requirement	Date
	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.	

Schedule 2 – Waste types, raw materials and fuels

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

Schedule 3 – Emissions and monitoring

Emission point ref. & location as shown in schedule 7	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A01	Natural gas fired steam boiler	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	No limit set			
		Carbon monoxide	No limit set			
A02 – A06	Natural gas fired hot water boiler	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	No limit set			
		Carbon monoxide	No limit set			
A07 – A09	Air compressor extraction	Heat	No limit set			
A13	Offices/ changing area extraction	Ventilation	No limit set			
A14	Offices/ changing area/ laundry room extraction	Ventilation	No limit set			
A15	Offices/ changing area extraction	Ventilation	No limit set			
A16 – A17	Changing area extraction	Ventilation	No limit set			
A18	Tote bin wash room	Hot water vapour	No limit set			
A19	Tote bin wash machine	Hot water vapour	No limit set			
A20	Low risk salad wash	Ventilation	No limit set			
A21	High risk salad wash	Ventilation	No limit set			
A22 – A23	Low risk bacon room	Ventilation	No limit set			

Emission point ref. & location as shown in schedule 7	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A24	Double D oven	Heat, Products of combustion	No limit set			
A25	Double D oven	Heat, cooking odour	No limit set			
A26	High risk bacon room	Heat, cooking odour	No limit set			
A27	Traywash machine	Hot water vapour	No limit set			
A28	Hygiene wash Room	Hot water vapour	No limit set			
A29	Kitchens	Heat, cooking odour	No limit set			
A30	Traywash machine	Hot water vapour	No limit set			
fired	Natural gas fired central	Oxides of Nitrogen	No limit set			
	heating boiler	(NO and NO2 expressed as NOx)	No limit set			
B01 – B02	Natural gas fired steam boiler	Oxides of Nitrogen	No limit set			
		(NO and NO2 expressed as NOx)	No limit set			
B03 – B06	Natural gas fired hot water	Oxides of Nitrogen	No limit set			
	boiler	(NO and NO2 expressed as NOx)	No limit set			
B07 – B08	Hygiene wash room	Hot water vapour	No limit set			
B09	Tray wash machine	Heat	No limit set			
B16	Natural gas fired central	Oxides of Nitrogen	No limit set			
	heating boiler	(NO and NO2 expressed as NOx)	No limit set			

Table S3.1 Point	source emission	ns to air – en	nission limits	and monitori	ng requireme	nts
Emission point ref. & location as shown in schedule 7	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
C01	Tray wash machine	Hot water vapour	No limit set			
C02 – C03	Changing room corridor	Ventilation	No limit set			
C06	Hygiene Wash Room	Hot water vapour	No limit set			
C07	Hot Water Blancher	Hot water vapour	No limit set			
	x2 natural gas fired hot water	Oxides of Nitrogen	No limit set			
	boilers	(NO and NO2 expressed as NOx)	No limit set			
D02 – D03	Air Handling Units (11) (West/North Side)	Ventilation	No limit set			
D04	Kitchens	Heat, cooking odour	No limit set			
D05	Tray wash (high care)	Hot water vapour	No limit set			
D06	Tray wash (low risk, BOC (M&S) Trays	Hot water vapour	No limit set			
D07	Ammonia refrigeration plant	No parameter set	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	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W1 [point labelled 'SD' on site drainage plan dated April 2014 submitted with application reference EPR/PP3730VH/A001] emission to Warren Spinney	Uncontaminated surface runoff	No parameter set	No limit set			
W2 [point labelled SW12 on plan ref TSL- 181-A-LAY-960-003 submitted with variation application EPR/PP3730VH/V002] emission to Warren Spinney	Uncontaminated surface runoff	No parameter set	No limit set			

Table S3.3 Point source emissions to sewer, effluent treatment plant or other transfers off-siteemission limits and monitoring requirements

55						
Emission point ref. & location in schedule 7	Source	Parameter	Limit (incl. Unit)	Reference period	Monitoring frequency	Monitoring standard or method
S1 [point labelled 'TE' on site drainage plan dated April 2014 submitted with application reference EPR/PP3730VH/A001] emission to Billing Waste Water Treatment Works	Treated process effluent from on-site effluent treatment plant	No parameters Set	No limit set	1		
S2 [point labelled 'TE' on site drainage plan dated April 2014 submitted with application reference EPR/PP3730VH/A001] emission to Billing Waste Water 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	

Table S4.3 Performance parameters			
Parameter	Frequency of assessment	Units	
Water usage	Annually	m³	
Energy usage	Annually	MWh	
Total raw material used	Annually	tonnes	
Waste	Annually	tonnes	
COD loss efficiency	Annually*	COD te/te product	
Food waste	Annually	tonnes	
- coa macto	7.11.100.119		

^{*}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					
	any malfunction, breakdown or failure of equipment or techniques, ince not controlled by an emission limit which has caused, is 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	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 t	the breach of permit conditions not related to limits		
To be notified within 24 hours of det	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.

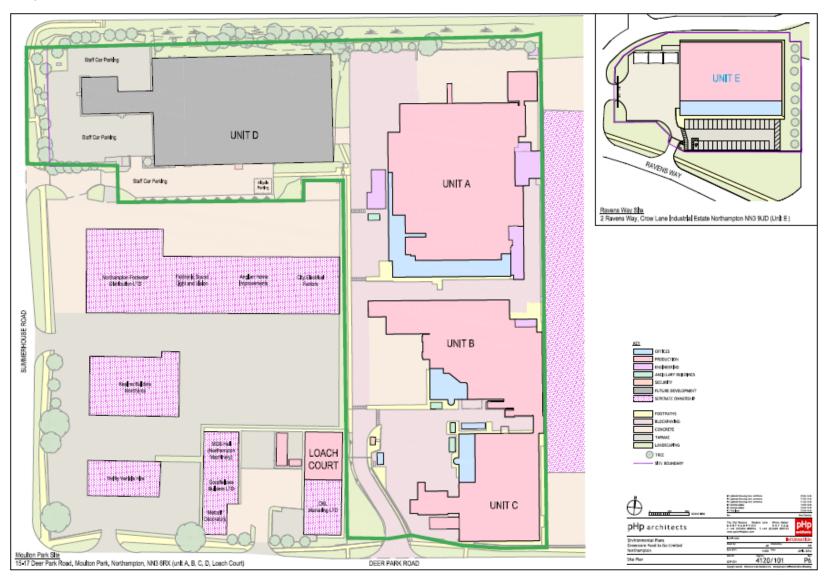
Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- 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

Site plan:

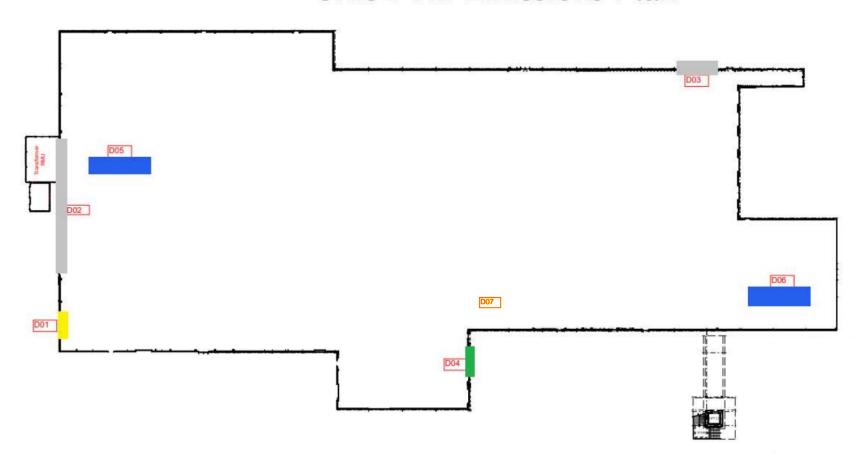


Emission source points to air 1 of 2:



Emission source points to air 2 of 2:

Unit D Air Emissions Plan



END OF PERMIT