

# Notice of variation and consolidation with introductory note

**The Environmental Permitting (England & Wales) Regulations 2016**

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Fold Hill Foods Limited

Fold Hill Foods

Fold Hill

Old Leake

Boston

Lincolnshire

England

PE22 9PJ

**Variation application number**

EPR/ZP3330BV/V004

**Permit number**

EPR/ZP3330BV

# Fold Hill Foods

## Permit number EPR/ZP3330BV

### 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 4<sup>th</sup> December 2019 in the official journal of the European Union.

We have implemented the requirements of the Medium Combustion Plant directive and incorporated post-dated requirements for 2030.

The schedules specify the changes made to the permit.

The main features of the permit are as follows:

Fold Hill Foods is situated in an agricultural area (NG Ref: TF 39914 54129), to the east of the hamlet of Wrangle Bank and approximately 13 km to the northeast of the town of Boston, Lincolnshire. The site is bordered by open fields as well as Wrangle Drain and Lade Bank Drain. The nearest residential receptor is 0.2km to the east. The site is located in the grounds of an active farm and surrounded by fields.

The installation is used for the manufacture of dry pet foods, in the form of biscuit and pellet products, and is permitted for this activity under S6.8A(1)(d)(iii)(aa), with the proportion of animal material in percent of weight of the finished product production capacity being approximately 23%. The installation operates 365 days a year and has a maximum capacity of 158 tonnes per day. Key stages in the manufacturing process involve weighing raw materials, including powdered cereals, tallow and animal 'digest' proteins, prior to shaping and baking to produce the final product. Once prepared and cooled, the products are packaged prior to distribution and sale.

The site generates air emissions associated with production processes and steam generation. The installation uses steam that is generated by the gas fired on-site boiler of 2.5MWth capacity, considered to be medium combustion plant (MCP). Flue gases are emitted by this MCP through a stack at emission point A19. 2 x 8MWth direct-fire oven systems use emission points A20, A21, A22, A23, A24 and A25. Particulate matter from extruding activities passes through emission points A4, A12, A15 and A15. There are dryer extraction emission points at A14, A26 and A27. Bag filters are part of the air handling and dust extraction system and form part of the air emissions abatement techniques for the process, used to reduce the atmospheric release of particulates. There are 2 grinders within the mill unit and a separate grinder house. All grinders vent internally, with no emissions points to air. Electricity is taken from the national grid, with an additional 50kW from solar panels. Ovens and Boiler are fuelled using LPG from four storage vessels.

The site has three separate drainage systems for surface/storm water, trade effluent and domestic foul sewage. Uncontaminated storm and surface water runoff is collected and then piped across the field adjacent to the site to the south, which then discharges into Wrangle Drain, a tributary of the Lord's Drain, via emission points W4, W5, W6 and W8. Trade effluent is presently collected via internal drainage to a sump and then transferred off-site by tanker for disposal. However, there is a Consent to Discharge for Trade Effluent (PRNNF/12927) at the site, into a tributary of Lord's Drain (Grid Ref: TF 4012 5388), which is used for boiler blowdown. Domestic foul sewage is directed to a septic tank adjacent to the carpark and tankered off-site for disposal as required by an appropriate waste contractor.

The installation has an internal Environment Management System.

The coastline is just over 7km to the east of the site and has been classified in part as The Wash & North Norfolk Coast Special Area of Conservation (SAC), The Wash Special Protection Area (SPA) and The Wash Ramsar Site (RAMSAR). The site is within Flood Zone 2 and 3.

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

| Status log of the permit   |  |  |
|--|--|--|
| Description  | Date   | Comments   |
| Application received<br>EPR/ZP3330BV/A001                                  | 27/08/2004   | --   |
| Additional information received  | 21/01/2005   | --   |
| Permit determined<br>ZP3330BV  | 27/04/2005   | Permit issued.   |
| Application<br>EPR/ZP3330BV/V002   | Duly made<br>21/07/2011                                    | Application to vary permit.  |
| Variation determined<br>EPR/ZP3330BV/V002                                  | 05/08/2011   | Variation permit issued.   |
| Application<br>EPR/ZP3330BV/V003<br>(variation and consolidation)          | Duly made<br>20/08/2019                                    | Application to vary and update the permit to modern conditions. Extension of the site boundary to include a storage warehouse in the centre of the facility. |
| Additional information received  | 23/09/2019   | Site plan showing emission point W8.   |
| Variation determined<br>EPR/ZP3330BV/V003                                  | 07/10/2019   | Varied permit issued   |
| Application EPR/ZP3330BV/V004<br>(variation and consolidation)             | Regulation 61<br>Notice response<br>received<br>30/05/2022 | Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.                                   |
| Application EPR/ZP3330BV/T005<br>(full transfer of permit<br>EPR/ZP3330BV) | Duly made<br>12/03/2025                                    | Application to transfer the permit in full to Fold Hill Foods Limited.   |
| Transfer determined<br>EPR/ZP3330BV  | 27/03/2025   | Full transfer of permit complete.  |
| Variation determined and<br>consolidation issued<br>EPR/ZP3330BV/V004      | 01/07/2025   | Varied and consolidated permit issued in modern format   |

| Other permits relating to this installation |  |               |
|---|--|---------------|
| Operator                                    | Permit number  | Date of issue |
| Fold Hill Foods Limited                     | PRNNF/12927 (Trade Effluent to Surface Water Consent to Discharge) | 28/05/2003    |

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/ZP3330BV**

### Issued to

**Fold Hill Foods Limited** ("the Operator")

of/ whose registered office is/ whose principal office is

**Fold Hill  
Old Leake  
Boston  
Lincolnshire  
England  
PE22 9PJ**

company registration number 01426126

to operate a regulated facility at

**Fold Hill Foods  
Fold Hill  
Old Leake  
Boston  
Lincolnshire  
England  
PE22 9PJ**

to the extent set out in the schedules.

The notice shall take effect from 01/07/2025

| Name         | Date       |
|--------------|------------|
| Beccy Brough | 01/07/2025 |

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/ZP3330BV**

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/ZP3330BV/V004 authorising,

**Fold Hill Foods Limited** ("the Operator"),

whose registered office is

**Fold Hill  
Old Leake  
Boston  
Lincolnshire  
England  
PE22 9PJ**

company registration number 01426126

to operate an installation at

**Fold Hill Foods  
Fold Hill  
Old Leake  
Boston  
Lincolnshire  
England  
PE22 9PJ**

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

| Name         | Date       |
|--------------|------------|
| Beccy Brough | 01/07/2025 |

Authorised on behalf of the Environment Agency

# Conditions

## 1 Management

### 1.1 General management

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

### 1.2 Energy efficiency

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

### 1.3 Efficient use of raw materials

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

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

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

## **2 Operations**

### **2.1 Permitted activities**

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

### **2.2 The site**

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

### **2.3 Operating techniques**

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

### **2.4 Improvement programme**

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

## **3 Emissions and monitoring**

### **3.1 Emissions to water, air or land**

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1, S3.2 and S3.3.



- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.
- 3.1.4 For the following activities referenced in schedule 1, table S1.1 (AR2) the first monitoring measurements shall be carried out within four months of 01/01/2030 or of the date when the MCP is first put into operation, whichever is later.

## **3.2 Emissions of substances not controlled by emission limits**

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The Operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The Operator shall:
  - (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
  - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the Operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

## **3.3 Odour**

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

## **3.4 Noise and vibration**

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

- (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

## **3.5 Monitoring**

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

## **3.6 Pests**

- 3.6.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The Operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.
- 3.6.2 The Operator shall:
  - (a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution from pests;
  - (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

# **4 Information**

## **4.1 Records**

- 4.1.1 All records required to be made by this permit shall:
  - (a) be legible;
  - (b) be made as soon as reasonably practicable;
  - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
  - (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
    - (i) off-site environmental effects; and
    - (ii) matters which affect the condition of the land and groundwater.

- 4.1.2 The Operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

## **4.2 Reporting**

- 4.2.1 The Operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.
- 4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:
- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
  - (b) the annual production/treatment data set out in schedule 4 table S4.2; and
  - (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.
- 4.2.3 Within 28 days of the end of the reporting period the Operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
  - (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
  - (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.4 The Operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

## **4.3 Notifications**

- 4.3.1 In the event:
- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the Operator must immediately—
    - (i) inform the Environment Agency,
    - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
    - (iii) take the measures necessary to prevent further possible incidents or accidents;
  - (b) of a breach of any permit condition the Operator must immediately—
    - (i) inform the Environment Agency, and
    - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
  - (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the Operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the Operator is to undertake monitoring and/or spot sampling, the Operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The Operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:
- Where the Operator is a registered company:
- (a) any change in the Operator's trading name, registered name or registered office address; and
  - (b) any steps taken with a view to the Operator going into administration, entering into a company voluntary arrangement or being wound up.
- Where the Operator is a corporate body other than a registered company:
- (a) any change in the Operator's name or address; and
  - (b) any steps taken with a view to the dissolution of the Operator.
- In any other case:
- (a) the death of any of the named Operators (where the Operator consists of more than one named individual);
  - (b) any change in the Operator's name(s) or address(es); and
  - (c) any steps taken with a view to the Operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.
- 4.3.5 Where the Operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
- (a) the Environment Agency shall be notified at least 14 days before making the change; and
  - (b) the notification shall contain a description of the proposed change in operation.
- 4.3.6 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.
- 4.3.7 Where the Operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:
- (a) a decision by the Secretary of State not to re-certify the agreement;
  - (b) a decision by either the Operator or the Secretary of State to terminate the agreement; and
  - (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

## **4.4 Interpretation**

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

# Schedule 1 – Operations

| Table S1.1 activities               |  |  |  |
|-------------------------------------|--|--|--|
| Activity reference                  | Activity listed in Schedule 1 of the EP Regulations  | Description of specified activity  | Limits of specified activity   |
| AR1                                 | Section 6.8 Part A 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 from animal and vegetable raw materials (other than milk only), both in combined and separate products, with a finished product production capacity greater than 75 tonnes per day. | From receipt of raw materials through to dispatch of final product.<br><br>Production capacity is limited to 158 tonnes per day.<br><br>The site operates 7 days per week. |
| <b>Directly Associated Activity</b> |  |  |  |
| AR2                                 | Steam supply. Heating of water for the purpose of steam production and supply to be used within the site boundary. | <u>Medium Combustion Plant:</u><br>2.5 MWth LPG fired steam raising boiler   | From receipt of fuel to release of products of combustion to air.  |
| AR3                                 | Raw material storage and handling  | Storage and handling of raw materials for use at the installation  | From receipt of raw materials to dispatch of final product.  |
| AR4                                 | 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.  |
| AR5                                 | Storage and use of chemicals and oils  | Storage and use of chemicals and oils at the installation.   | From receipt of chemicals and oils to disposal of wastes arising.  |
| AR6                                 | Waste storage and handling   | Storage and handling of waste materials  | From generation of waste to storage pending removal for disposal or recovery.  |
| AR7                                 | Product storage and handling   | Processing, storage, handling and despatch of product.   | Processing, storage, loading and despatch of all product from the manufacturing process.   |
| AR8                                 | Abatement systems for process emissions, prior to release to air   | Operation of site abatement systems for the control of releases to air.  | Extraction and collection of waste gases and treatment in abatement system, before emission to atmosphere.   |
| AR9                                 | Surface water drainage   | Collection of clean uncontaminated site surface waters   | Handling and storage of site drainage until discharge to the site surface water system.  |

| <b>Table S1.2 Operating techniques</b>                                     |  |  |
|--|--|--|
| <b>Description</b>   | <b>Parts</b>   | <b>Date Received</b>                         |
| Regulation 61 (1) Notice – Responses to questions dated 31/01/2022         | All parts  | Received 30/05/2022                          |
| Regulation 61(1) Notice – request for further information dated 29/01/2025 | Updated Reg 61 spreadsheet and associated documents from Fold Hill Foods Limited and updated confirmation of activities and production capacity  | Received 05/03/2025, 12/03/2025 & 01/04/2025 |
| Request for further information dated 07/04/2025                           | Technical standards in relation to Best available techniques as described in BAT conclusions under Directive 2010/75/EU of the European Parliament and of the Council on establishing best available techniques (BAT) conclusions for the food, drink and milk industries, BAT Conclusions Numbers 2,3,4,6,9 & 17. Also, regarding Medium Combustion Plant onsite, site boundary & updated emission points to air and water, hazardous substances, climate change adaption plan and containment. | Received 25/04/2025 and 06/05/2025           |
| Request for further information dated 08/04/2025                           | Information confirming heat exchanger is non-operational.  | Received 09/04/2025                          |
| Additional information dated 20/05/2025                                    | Confirmation: Scrubber and biofilter removed from site; emission points to surface water and emissions to air.   | Received 02/06/2025                          |

| <b>Table S1.3 Improvement programme requirements</b> |   |   |
|--|---|---|
| <b>Reference</b>                                     | <b>Requirement</b>  | <b>Date</b>   |
| IC7  | <p>The Operator shall submit, for approval by the Environment Agency, a report demonstrating achievement of the 'Narrative' BAT conclusions as identified in the Food, Drink and Milk Bref published on 4 December 2019 where BAT is currently not demonstrated or achieved. The report shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>• Methodology applied for achieving BAT</li> <li>• Demonstrating that BAT has been achieved.</li> </ul> <p>The report shall address the BAT Conclusions for Food, Drink and Milk Industries with respect to BATc 5 and 6.</p> <p>Refer to BAT Conclusions for a full description of the BAT requirement.</p>  | 3 months from date of issue or as agreed in writing by the Environment Agency |
| IC8  | <p>The Operator shall use refrigerants without ozone depletion potential and with a low global warming potential (GWP) in accordance with BAT 9 from the Food, Drink and Milk Industries BATCs.</p> <p>To demonstrate compliance against BAT 9, the Operator shall produce a plan for the onsite refrigerant system(s) at the installation. The plan is to be approved by the Environment Agency and shall be incorporated within the existing environmental management system.</p> <p>The plan should include, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>• Where practicable, retro filling systems containing high GWP refrigerants e.g. R-404A with lower GWP alternatives as soon as possible.</li> <li>• An action log with timescales, for replacement of end-of-life equipment using refrigerants with the lowest practicable GWP.</li> </ul> | 3 months from date of issue or as agreed in writing by the Environment Agency |

**Table S1.3 Improvement programme requirements**

| Reference | Requirement  | Date   |
|-----------|--|--|
| IC9       | <p>The Operator shall confirm, with the Environment Agency's agreement, 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 15.</p> <p>Refer to BAT Conclusions for a full description of the BAT requirement.</p>   | 3 months from date of issue or as agreed in writing by the Environment Agency              |
| IC10      | <p>The Operator shall produce a written report of monitoring carried out to determine the size distribution of particulate matter in the exhaust gas emissions to air from emission point [A4, A12, A15, A18], identifying the fractions within the PM10 and PM2.5 ranges. The monitoring shall be carried out under representative operating conditions and shall be in accordance with EN ISO 23210 unless otherwise agreed with the Environment Agency.</p> <p>The report shall be submitted to the Environment Agency for approval.</p>  | 12 months from permit issue or other date as agreed in writing with the Environment Agency |
| IC11      | <p>The Operator shall confirm in writing to the Environment Agency for approval that they have achieved the specific Environmental Performance Levels (EPLs) for specific energy consumption, where compliance with the EPL was not demonstrated at the time of R61 submission.</p> <p>Where an Operator cannot achieve the EPL, they should provide a justification and derive a site specific benchmark.</p> <p>Refer to BAT Conclusions for a full description of the requirements.</p>   | 3 months from date of issue or as agreed in writing by the Environment Agency              |
| IC12      | <p>The Operator shall review and update the H1 risk assessment [for particulate emissions to air] at the capacity levels stated within table S1.1 of this permit. The H1 shall be submitted to the Environment Agency for review.</p>  | 12 months from permit review   |
| IC13      | <p>The Operator shall review the disposal of boiler blowdown, compressor condensate and wash waters from the installation. Following the assessment the operator shall submit the report to the Environment Agency for approval.</p> <p>The report shall include (but not be limited to) the following;</p> <ul style="list-style-type: none"> <li>• An assessment of the impact for the proposed route using the Environment Agency's H1 methodology taking into consideration the characteristics of the boiler blowdown, compressor condensate and wash waters (temperature, pH, suspended solids, metals and any other potentially polluting substances).</li> <li>• Detail the specific arrangements for disposal of the blowdown associated with annual inspection and servicing.</li> <li>• List the options for disposal, justifying the proposed route (disposals not being treated in an onsite or offsite waste water treatment plant should be fully justified).</li> <li>• A proposed timetable for completion of any improvement works required.</li> </ul> <p>The Operator shall implement any necessary improvements to a timetable agreed in writing by the Environment Agency.</p> | 12 months or other date as agreed the Environment Agency                                   |
| IC14      | <p>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.</p>   | 12 months from permit issue  |

**Table S1.3 Improvement programme requirements**

| Reference | Requirement  | Date                        |
|-----------|--|-----------------------------|
|           | The plan shall be implemented in accordance with the Environment Agency's written approval, including timescales to undertake any infrastructure improvements.   |                             |
| IC15      | <p>The Operator shall undertake a survey of the primary, secondary and tertiary containment at the site and review measures against relevant standard including:</p> <ul style="list-style-type: none"><li>• CIRIA Containment systems for the prevention of pollution (C736) – Secondary, tertiary and other measures for industrial and commercial premises,</li><li>• EEMUA 159 - Above ground flat bottomed storage tanks</li></ul> <p>The operator shall submit a written report to the Environment Agency for approval which outlines the results of the survey and the review of standard and provide details of</p> <ul style="list-style-type: none"><li>• current containment measures</li><li>• any deficiencies identified in comparison to relevant standards,</li><li>• improvements proposed</li><li>• time scale for implementation of improvements.</li></ul> <p>After completion of a drainage survey the Operator shall submit technical drawing(s) of all onsite drainage for Environment Agency approval.</p> <p>The Operator shall implement the proposed improvements in line with the timescales agreed by the Environment Agency.</p> | 12 months from permit issue |



# 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

**Table S3.1 Point source emissions to air – emission limits and monitoring requirements**

| Emission point ref. & location  | Source   | Parameter  | Limit (including unit)                  | Reference period | Monitoring frequency         | Monitoring standard or method |
|---|--|--|---|------------------|------------------------------|-------------------------------|
| A4 [Point A4 on site plan in Schedule 7]  | C2 (Cyclone) Extruder – Vertical Cooler Extract for dry pet food | Particulate Matter                               | 20 mg/m <sup>3</sup> for existing plant | Once yearly      | Average over sampling period | BS EN 13284-1                 |
| A12 [Point A12 on site plan in Schedule 7]  | C2 (Cyclone) Extruder – Drier Cooler Extract for dry pet food    | Particulate Matter                               | 20 mg/m <sup>3</sup> for existing plant | Once yearly      | Average over sampling period | BS EN 13284-1                 |
| A14 & A26 [Points A14 & A26 on site plan in Schedule 7]   | SPP Dryer – Extract Vent   | No parameters set                                | No limits set                           | --               | --                           | --                            |
| A15 [Point A15 on site plan in Schedule 7]  | C2 (Cyclone) Extract – Vacuum Extract for dry pet food           | Particulate Matter                               | 20 mg/m <sup>3</sup> for existing plant | Once yearly      | Average over sampling period | BS EN 13284-1                 |
| A18 [Point A18 on site plan in Schedule 7]  | C2 (Cyclone) Extruder – Drier Extract                            | Particulate Matter                               | 20 mg/m <sup>3</sup> for existing plant | Once yearly      | Average over sampling period | BS EN 13284-1                 |
| A19 [Point A19 on site plan in Schedule 7]  | Boiler Plant 2.4MWth LPG fuelled                                 | Oxides of Nitrogen (NO and NO2 expressed as NO2) | 250 mg/m <sup>3</sup> [Note 2]          | Periodic         | Every three years            | BS EN 15267-3 [Note 1]        |
|   |  | Carbon monoxide                                  | No Limit [Note 2]                       | Periodic         | Every three years            | MCERTS BS EN15058             |
| A20, A21, A22, A23, A24 & A25 [Points A20, A21, A22, A23, A24 & A25 on site plan in Schedule 7] | Oven 3 Extract   | No parameters set                                | No limit set                            | --               | --                           | --                            |
| A27 [Point A27 on site plan in Schedule 7]  | SPP Dryer extract Vent   | No parameters set                                | No limit set                            | --               | --                           | --                            |

**Note 1:** certification to the MCERTS performance standards indicates compliance with BS EN 15267-3

**Note 2:** Emission limit and/or monitoring requirements apply from 1 January 2030, unless otherwise advised by the Environment Agency.

**Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements**

| <b>Emission point ref. &amp; location</b>                                    | <b>Source</b>         | <b>Parameter</b>                   | <b>Limit (incl. unit)</b> | <b>Reference Period</b> | <b>Monitoring frequency</b> | <b>Monitoring standard or method</b> |
|--|-----------------------|------------------------------------|---------------------------|-------------------------|-----------------------------|--------------------------------------|
| W4 (on site plan in schedule 7 to Wrangle Drain, a tributary of Lord's Drain | Surface water run-off | Clean uncontaminated surface water | No limit set              | --                      | --                          | --                                   |
| W5 on site plan in schedule 7 to Wrangle Drain, a tributary of Lord's Drain  | Surface water run-off | Clean uncontaminated surface water | No limit set              | --                      | --                          | --                                   |
| W6 on site plan in schedule 7 to Wrangle Drain, a tributary of Lord's Drain  | Surface water run-off | Uncontaminated surface water       | No limit set              | --                      | --                          | --                                   |
| W8 on site plan in schedule 7 to Wrangle Drain, a tributary of Lord's Drain  | Surface water run-off | Uncontaminated surface water       | No limit set              | --                      | --                          | --                                   |

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

| <b>Emission point ref. &amp; location</b>                           | <b>Source</b>                           | <b>Parameter</b>  | <b>Limit (incl. Unit)</b> | <b>Reference period</b> | <b>Monitoring frequency</b> | <b>Monitoring standard or method</b> |
|---|---|-------------------|---------------------------|-------------------------|-----------------------------|--------------------------------------|
| S1 Collection point, for transfer offsite via tanker, for treatment | Process effluent from onsite activities | No parameters Set | No limit set              | --                      | --                          | --                                   |

## Schedule 4 – Reporting

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

| Table S4.1 Reporting of monitoring data                                    |  |   |   |
|--|--|---|---|
| Parameter  | Emission or monitoring point/reference | Reporting period  | Period begins   |
| Point source emissions to air<br>Parameters as required by condition 3.5.1 | A4, A12, A15, A18                      | Every 12 months   | 1 January   |
|  | A19 (MCPD Boiler emission point)       | First monitoring undertaken in accordance with Condition 3.1.4 to be reported within 3 months, and then every 3 years thereafter. | From first monitoring requirements in accordance with Condition 3.1.4 |

| Table S4.2: Annual production/treatment |        |
|---|--------|
| Parameter                               | Units  |
| Pet food                                | tonnes |

| Table S4.3 Performance parameters |                         |                |
|-----------------------------------|-------------------------|----------------|
| Parameter                         | Frequency of assessment | Units          |
| Water usage                       | Annually                | m <sup>3</sup> |
| Energy usage                      | Annually                | MWh            |
| Waste – recovery/ disposal routes | Annually                | tonnes         |

| Table S4.4 Reporting forms    |   |                              |
|-------------------------------|---|------------------------------|
| Parameter                     | Reporting form  | Form version number and date |
| Point source emissions to air | Emissions to Air Reporting Form, or other form as agreed in writing by the Environment Agency             | Version 1, 08/03/2021        |
| Water usage                   | Water Usage Reporting Form, or other form as agreed in writing by the Environment Agency                  | Version 1, 08/03/2021        |
| Energy usage                  | Energy Usage Reporting Form, or other form as agreed in writing by the Environment Agency                 | Version 1, 08/03/2021        |
| 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 |  |

|   |
|---|
| <b>(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution</b> |
|---|

|  |
|--|
| <b>To be notified within 24 hours of detection</b> |
|--|

|  |  |
|--|--|
| 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>(b) Notification requirements for the breach of a limit</b> |
|--|

|   |
|---|
| <b>To be notified within 24 hours of detection unless otherwise specified below</b> |
|---|

|   |  |
|---|--|
| Emission point reference/ source                              |  |
| Parameter(s)  |  |
| Limit   |  |
| Measured value and uncertainty                                |  |
| Date and time of monitoring                                   |  |
| Measures taken, or intended to be taken, to stop the emission |  |

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

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

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

## Part B – to be submitted as soon as practicable

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

|           |  |
|-----------|--|
| Name*     |  |
| Post      |  |
| Signature |  |
| Date      |  |

\* authorised to sign on behalf of the Operator

## Schedule 6 – Interpretation

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

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

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

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

“Emissions to land” includes emissions to groundwater.

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

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

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

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

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

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

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

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

“Pests” means Birds, Vermin and Insects.

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

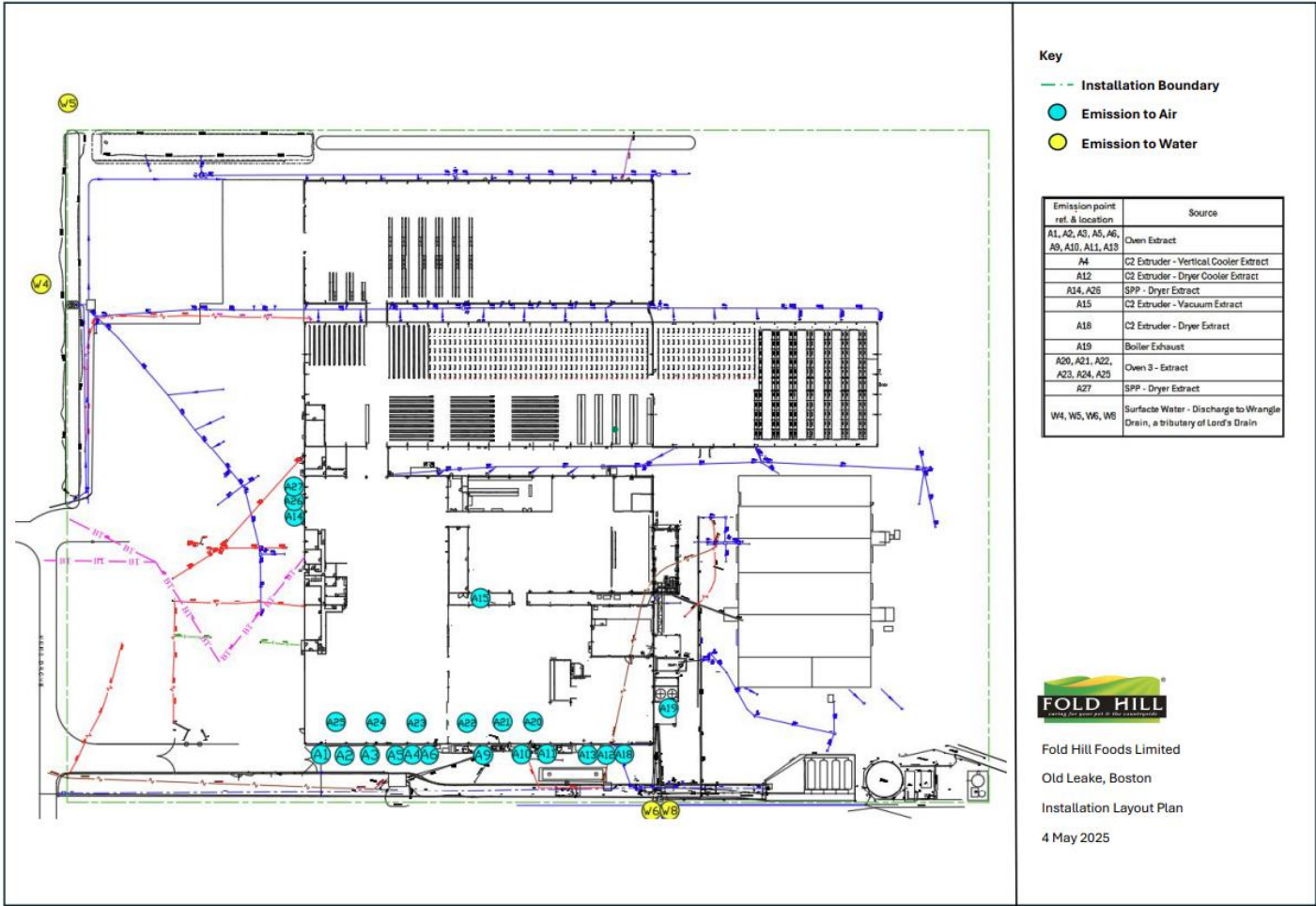
Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or
- in relation to emissions from gas engines or gas turbines, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 15% dry for liquid and gaseous fuels ;

“year” means calendar year ending 31 December.



# Schedule 7 – Site plan



END OF PERMIT