



Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Danish Crown UK Limited

Danish Crown Bugle
Ebenezer
Bugle
St Austell
PL26 8RR

Variation application number

EPR/DP3631RA/V004

Permit number

EPR/DP3631RA

Danish Crown Bugle

Permit number EPR/DP3631RA

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. Only the variations specified in schedule 1 are subject to a right of appeal.

Variation

This variation is for the addition of biological treatment to the site's current effluent treatment plant. There is no change in volume of discharge to sewer or the hazardous chemicals. The addition of biological treatment is in conjunction with the existing effluent treatment onsite and is incorporated in that activity.

We have also corrected and updated the air emissions associated with the site.

Operations

The main features of the permit are as follows.

The Danish Crown Bugle installation is located to the Northeast of the village of Bugle in central Cornwall and covers approximately 1.5 hectares. The site is accessed from St. Austell Street and located on National grid reference SX 03560 60170. The surrounding area mostly consists of rural farmland; however, there are sensitive residential receptors to the North within 100m of the installation.

The Environmental Permit is for the following scheduled activity:

6.8 A(1)(d)(i) - 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) only animal raw materials (other than milk only) with a finished product production capacity greater than 75 tonnes per day.

The installation has a maximum theoretical production capacity to produce 264 tonnes of finished product per day.

The installation produces a range of cooked, cured and smoked meat (primarily pork) and poultry products. Pork primals received on-site are first de-boned and de-fatted prior to either curing or cooking. Curing involves injection of meat with brine solution and emulsion materials, together with massage with paddles under vacuum. Cooking is carried out in steam ovens; cooked product is chilled. Smoking is carried out in friction wheel smoke houses fitted with catalytic converters to treat emissions. Waste streams include waste packaging; waste meat; bad fat; and effluent sludge. Process effluent together with site drainage from sensitive areas (trolley wash bay, compactor, animal byproducts storage trailer) are treated in the on-site effluent treatment plant. All other surface drainage discharges into a reed bed for treatment at the south end of the site, and thence discharges via an adjustable weir into an unnamed stream.

Process effluent together with site drainage from sensitive areas (trolley wash bay, compactor, animal byproducts storage trailer) are treated in the on-site effluent treatment plant, by mainly physio-chemical treatment with the addition of biological treatment, via the following route:

From the sump, raw untreated water passes through the rotary filter to remove any large debris that may be present. It then passes to the holding tanks ready for processing, from here, the water is pumped into the first dissolved air floatation (DAF) plant via a number of tubes (flocculator) where chemicals are added to aid the

separation of organic compounds (sludge) from the water. This sludge is then sent to the sludge tank for later removal by tanker.

The cleaner water is then pumped into the selector tank where bacteria are present to digest the remaining compounds. The water is then transferred to the aeration tank where the process continues. Water from the aeration tanks is then pumped into a second DAF plant where the bacteria and sludge are removed and sent either to another sludge tank, back to the selector tank, or direct to the aeration tank depending on how well the plant is performing. This effluent is then discharged to foul sewer under consent of South West Water.

This falls under a secondary 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.

All other surface drainage discharges into a reed bed for treatment at the south end of the site and thence discharges via an adjustable weir into an unnamed stream.

The main releases to air are the combustion gases from the on-site combustion plants and ten smoke chambers. The installation utilises one 1.2 MWth gas oil (diesel) fired boiler. This boiler is used to produce steam and heat for direct process use. There are also two 0.5 MWth water boilers on-site.

There are four designated statutory sites within 10km of the installation which consist of Breney Common and Goss & Tregoss Moors (Special Area of Conservation (SAC)), St Austell Clay Pits (SAC), River Camel (SAC), and Falmouth Bay to St Austell Bay (Special Protection Area (SPA)). There is one statutory Site of Special Scientific Interest (SSSI) site within 2km of the installation which is the Mid Cornwall Moors. There are several non-statutory sites within 2km of the installation consisting of 6 wildlife sites.

The site has an internal Environmental Management System (EMS) which is audited through a scheduled internal audit process which takes place continuously.

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

| Status log of the permit | | |
|--|---|--|
| Description | Date | Comments |
| Application received EPR/TP3937PS/A001 | Received 08/10/2004 | Application received for the production of meat products, primarily pork. |
| Response to request for information | Sent 18/03/2005 | Response received 03/04/2005. |
| Request to transfer application to a new Operator EPR/ZP3831SY | Received 28/06/2005 | Application TP3937PS withdrawn. |
| Permit determined | 05/10/2005 | Permit EPR/ZP3831SY/A001 issued. |
| Agency variation determined EPR/ZP3831SY/V002 | 05/03/2014 | Agency variation to implement the changes introduced by IED |
| Application EPR/DP3631RA/T001 (full transfer of permit EPR/ZP3831SY | Duly made 03/03/2016 | Application to transfer the permit in full to Danish Crown UK Limited. |
| Transfer determined EPR/DP3631RA | 31/03/2016 | Full transfer or permit complete. |
| Application EPR/DP3631RA/V003 (variation and consolidation) | Regulation 61 Notice response received 01/12/2022 | Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review. |
| Response to request for information dated 07/06/2024 | Received 28/06/2024 | Information requested in relation to Reg.61 response tool concerning BATc 1, 2, 3, 5, 6, 7, 11, 15, 29, medium combustion plant, climate change adaption, containment, site plan, and site name. |

| Status log of the permit | | |
|---|----------------------|--|
| Description | Date | Comments |
| Response to request for information dated 16/07/2024 | Received 18/07/2024 | Information requested in relation to Reg.61 response tool concerning BATc 7. |
| Variation determined and consolidation issued EPR/DP3631RA/V003 | 27/08/2024 | Varied and consolidated permit issued in modern format. |
| Application EPR/DP3631RA/V004 (variation and consolidation) | Duly made 29/01/2025 | Application to vary and update the permit to modern conditions. |
| Additional information received | 27/10/2025 | Clarification of site air emissions and updated site emission plan |
| Variation determined EPR/DP3631RA | 19/11/2025 | Notice of variation and consolidation issued |

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/DP3631RA

Issued to

Danish Crown UK Limited (“the operator”)

whose registered office is

**Unit I,
John Milne Avenue,
Rochdale,
Greater Manchester,
OL16 4SY**

company registration number 02021233

to operate a regulated facility at

**Danish Crown Bugle
Ebenezer
Bugle
St Austell
PL26 8RR**

to the extent set out in the schedules.

The notice shall take effect from 19/11/2025

| Name | Date |
|--------------|------------|
| Beccy Brough | 19/11/2025 |

Authorised on behalf of the Environment Agency

Schedule 1

The following conditions were varied as a result of the application made by the operator:

- Table S1.1, as referenced in condition 2.1.1 is updated to include reference to biological treatment in AR2, alterations to AR3, removal of AR4 and renumbering of subsequent directly associated activities.
- Table S1.2, as referenced in conditions 2.3.1 and 2.3.2 is updated to include the operating techniques employed to support the changes introduced by this variation.
- Table S3.1, as referenced in conditions 3.1.1, 3.5.1(a) and 3.5.3, has been updated to reflect the air emissions on site that were previously omitted and to include an emission limit value for TVOCs.
- Table S4.1, as referenced in conditions 4.2.3(a) and 4.2.3(b), has been updated to include new air emission reporting requirements.
- Table S4.3, as referenced in condition 4.2.2(c) has been updated to remove COD loss efficiency.
- Schedule 7, as referenced in condition 2.2.1 has been updated.

The following conditions are added as a result of the application made by the operator:

- 2.3.5 For the following activities referenced in Schedule 1 Table S1.1 (AR3):
 - a) the operator must keep periods of start-up and shut down of the combustion plant as short as possible.
 - b) there shall be no persistent emission of 'dark smoke' as defined in section 3(1) of the Clean Air Act 1993.
- 3.5.5 For the following activities referenced in schedule 1, table S1.1(AR3):
 - a) for existing MCPs the first monitoring measurement shall be carried out at any time, but no later than the relevant compliance date.
- 3.5.6 Monitoring of MCP shall not take place during periods of start-up or shut down.
- 4.1.3 The operator shall maintain a record of the type and quantity of fuel used and the total annual operating hours for each MCP.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/DP3631RA

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/DP3631RA/V004 authorising,

Danish Crown UK Limited (“the Operator”),

whose registered office is

**Unit I,
John Milne Avenue,
Rochdale,
Greater Manchester,
OL16 4SY**

company registration number 02021233

to operate an installation at

**Danish Crown Bugle
Ebenezer
Bugle
St Austell
PL26 8RR**

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

| Name | Date |
|--------------|------------|
| Beccy Brough | 19/11/2025 |

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 For the following activities referenced in schedule 1, table S1.1(AR3):

- (a) the operator must keep periods of start-up and shut down of the combustion plant as short as possible.
- (b) there shall be no persistent emission of ‘dark smoke’ as defined in section 3(1) of the Clean Air Act 1993.

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 AR3 (boiler plant) 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, 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.
- 3.5.5 For the following activities referenced in schedule 1, table S1.1(AR3):
 - (a) for existing MCPs the first monitoring measurement shall be carried out at any time, but no later than the relevant compliance date.
- 3.5.6 Monitoring of MCP shall not take place during periods of start-up or shut down.

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.

4.1.3 The operator shall maintain a record of the type and quantity of fuel used and the total annual operating hours for each MCP.

4.2 Reporting

4.2.1 The Operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.

4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
- (b) the annual production/treatment data set out in schedule 4 table S4.2; and
- (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.

4.2.3 Within 28 days of the end of the reporting period the Operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.

4.2.4 The Operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

4.3 Notifications

4.3.1 In the event:

- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the Operator must immediately—
 - (i) inform the Environment Agency,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;

- (b) of a breach of any permit condition the Operator must immediately—
 - (i) inform the Environment Agency, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
- (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the Operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the Operator is to undertake monitoring and/or spot sampling, the Operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The Operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the Operator is a registered company:

- (a) any change in the Operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the Operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the Operator is a corporate body other than a registered company:

- (a) any change in the Operator's name or address; and
- (b) any steps taken with a view to the dissolution of the Operator.

In any other case:

- (a) the death of any of the named Operators (where the Operator consists of more than one named individual);
- (b) any change in the Operator's name(s) or address(es); and
- (c) any steps taken with a view to the Operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.3.5 Where the Operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- (a) the Environment Agency shall be notified at least 14 days before making the change; and
- (b) the notification shall contain a description of the proposed change in operation.

4.3.6 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.

4.3.7 Where the Operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:

- (a) a decision by the Secretary of State not to re-certify the agreement;
- (b) a decision by either the Operator or the Secretary of State to terminate the agreement; and
- (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

4.4 Interpretation

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

Schedule 1 – Operations

| Table S1.1 activities | | | |
|-------------------------------------|--|---|---|
| Activity reference | Activity listed in Schedule 1 of the EP Regulations | Description of specified activity | Limits of specified activity |
| AR1 | Section 6.8 Part A1 (d) (i) | 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) only animal raw materials (other than milk only) with a finished product production capacity greater than 75 tonnes per day. | From receipt of raw materials such as pork primals, chicken and turkey to production of finished product including storage and dispatch of pork-based products off-site. Production capacity is limited to 264 tonnes per day. |
| AR2 | Section 5.4 Part A1 (a) (ii) | Disposal of non-hazardous waste in a facility with a capacity exceeding 50 tonnes per day by physico-chemical treatment. | From generation of wastewater to treatment via filtration, dissolved air floatation, selector tank (incorporating biological treatment), secondary dissolved air floatation and aeration to discharge to sewer. |
| Directly Associated Activity | | | |
| AR3 | Steam supply and heat generation | <u>Medium Combustion plant:</u> 1 x 1.2 MWth diesel-fired boiler (A17) <u>Other Combustion plant:</u> 2 x 0.5 MWth liquefied petroleum gas fired boiler (A15 and A16). | From receipt of diesel to release of combustion to air to production of steam and associated wastes removed from site. |
| AR4 | Operation of meat smoker chambers | Ten meat smokers (A1-A10). | From receipt of fuel to release of products of combustion to air. |
| 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 primals 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. |

| Table S1.1 activities | | | |
|------------------------------|--|---|---|
| Activity reference | Activity listed in Schedule 1 of the EP Regulations | Description of specified activity | Limits of specified activity |
| AR9 | Surface water drainage | Collection of uncontaminated site surface waters. | Handling and storage of site drainage until discharge to the site surface water system. |

| Table S1.2 Operating techniques | | |
|--|--|----------------------|
| Description | Parts | Date Received |
| Regulation 61 (1) Notice – Responses to questions dated 01/08/2022 | All parts | Received 01/12/2022 |
| Regulation 61(1) Notice – request for further information dated 07/06/2024 | Information requested in relation to Reg.61 response tool concerning BATc 1, 2, 3, 5, 6, 7, 11, 15, 29, medium combustion plant, climate change adaption, containment, site plan, and site name. | Received 28/06/2024 |
| Regulation 61(1) Notice – request for further information dated 16/07/2024 | Information requested in relation to Reg.61 response tool concerning BATc 7. | Received 18/07/2024 |
| Application EPR/DP3631RA/V004 | Response to application forms C2 and C3, and referenced supporting documents – including odour management plan [Issue 1, Nov 2024] | Duly made 29/01/2025 |
| Further information received | Information regarding updated air emissions and updated site emission plan | Received 27/10/2025 |

| Table S1.3 Improvement programme requirements | | |
|--|---|---|
| Reference | Requirement | Date |
| IC9 | <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"> • Methodology applied for achieving BAT • Demonstrating that BAT has been achieved. <p>The report shall address the BAT Conclusions for Food, Drink and Milk Industries with respect to BATc 1, 2, 5 and 6. Refer to BAT Conclusions for a full description of the BAT requirement.</p> | 3 months from date of issue of V003 or as agreed in writing by the Environment Agency 27/11/2024 |
| IC10 | <p>The operator shall use refrigerants without ozone depletion potential and with a low global warming potential (GWP) in accordance with BAT 9 from the Food, Drink and Milk Industries BATCs.</p> <p>To demonstrate compliance against BAT 9, the operator shall produce a plan for the onsite refrigerant system(s) at the installation. The plan is to be assessed by the Environment Agency and shall be incorporated within the existing environmental management system.</p> | 3 months from date of issue of V003 or as agreed in writing by the Environment Agency 27/11/2024 |

| Table S1.3 Improvement programme requirements | | |
|--|--|--|
| Reference | Requirement | Date |
| | <p>The plan should include, but not be limited to, the following:</p> <ul style="list-style-type: none"> • Where practicable, retro filling systems containing high GWP refrigerants e.g. R-404A with lower GWP alternatives as soon as possible. • An action log with timescales, for replacement of end-of-life equipment using refrigerants with the lowest practicable GWP. | |
| IC11 | <p>The Operator shall review and update the H1 risk assessment at the capacity levels stated within table S1.1 of this permit. The H1 shall be submitted to the Environment Agency for review.</p> | <p>12 months from date of issue of V003 or as agreed in writing by the Environment Agency 27/08/2025</p> |
| IC12 | <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> <p>The plan shall be implemented in accordance with the Environment Agency's written approval, including timescales to undertake any infrastructure improvements.</p> | <p>12 months from date of issue of V003 or as agreed in writing by the Environment Agency 27/08/2025</p> |

Schedule 2 – Waste types, raw materials and fuels

| Table S2.1 Raw materials and fuels | |
|---|--------------------------------|
| Raw materials and fuel description | Specification |
| Gas oil | Less than 0.1% sulphur content |

Schedule 3 – Emissions and monitoring

| Emission point ref. & location | Source | Parameter | Limit (including unit) | Reference period | Monitoring frequency | Monitoring standard or method |
|--|--|---|---|-------------------------|-----------------------------|--------------------------------------|
| A1 – A10 [Points A1 – A10 on site plan in Schedule 7] | Smokers 1-10 | Total Volatile Organic Compounds (TVOC) | 50 mg/m ³ <small>[note 3]</small> | Average | Annually | BS EN12619 |
| A11 – A14 [Points A11 – A14 on site plan in Schedule 7] | Cookers 1 – 4 | No parameters set | No limit set | -- | -- | -- |
| A15 [Point A15 on site plan in Schedule 7] | Water boiler 1 x 0.5 MWth liquefied petroleum gas fired boiler | No parameters set | No limit set | -- | -- | -- |
| A16 [Point A16 on site plan in Schedule 7] | Water boiler 1 x 0.5 MWth liquefied petroleum gas fired boiler | No parameters set | No limit set | -- | -- | -- |
| A17 [Point A17 on site plan in Schedule 7] <small>[Note 1]</small> | Boiler Plant 1 x 1.2 MWth Gas oil (diesel fired boiler) <small>[Note 2]</small> | Oxides of Nitrogen (NO and NO ₂ expressed as NO _x) | 200 mg/m ³ | Periodic | Every three years | BS EN14792 |
| | | Carbon monoxide | No Limit set | Periodic | Every three years | MCERTS BS EN15058 |
| A18 [Point A18 on site plan in Schedule 7] | Air Handling Unit Decadesant Drying Burner using LPG | No parameters set | No limit set | -- | -- | -- |
| <p>Note 1: The emission monitoring/limits requirements apply from 1 January 2030, unless otherwise advised by the Environment Agency and if the boiler is replaced.</p> <p>Note 2: "Gas oil" includes diesel and is defined in Article 3(19) of the MCPD.</p> <p>Note 3: Limit is not applicable when the TVOC emission load is below 500 g/h.</p> | | | | | | |

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

| Emission point ref. & location | Source | Parameter | Limit (incl. unit) | Reference Period | Monitoring frequency | Monitoring standard or method |
|---|-------------------------------|------------------|---------------------------|-------------------------|-----------------------------|--------------------------------------|
| W1 [Point W1 on site plan in schedule 7] emission to unnamed stream via a reed bed. | Uncontaminated surface runoff | No parameter set | No limit set | -- | -- | -- |

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

| Emission point ref. & location | Source | Parameter | Limit (incl. Unit) | Reference period | Monitoring frequency | Monitoring standard or method |
|---|---|-------------------|---------------------------|-------------------------|-----------------------------|--------------------------------------|
| S1 [Point S1 on site plan in schedule 7] emission to South West Water foul sewer. | Treated process effluent from onsite 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 |
| Point source emissions to air Parameters as required by condition 3.5.1 | A1 – A10 | Every 12 months | 1 January |
| | A17 | 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 |
| Total product produced. | tonnes |

| Table S4.3 Performance parameters | | |
|--|--------------------------------|----------------|
| Parameter | Frequency of assessment | Units |
| Water usage | Annually | m ³ |
| Energy usage | Annually | MWh |
| Waste | Annually | tonnes |
| Refrigerant Consumption | Annually | Kg |
| F-Gas leaks | Annually | Kg |
| Food waste | Annually | Tonnes |

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

Schedule 5 – Notification

These pages outline the information that the Operator must provide.

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

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

Part A

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

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

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

OFFICIAL

| | |
|-----------|--|
| 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.

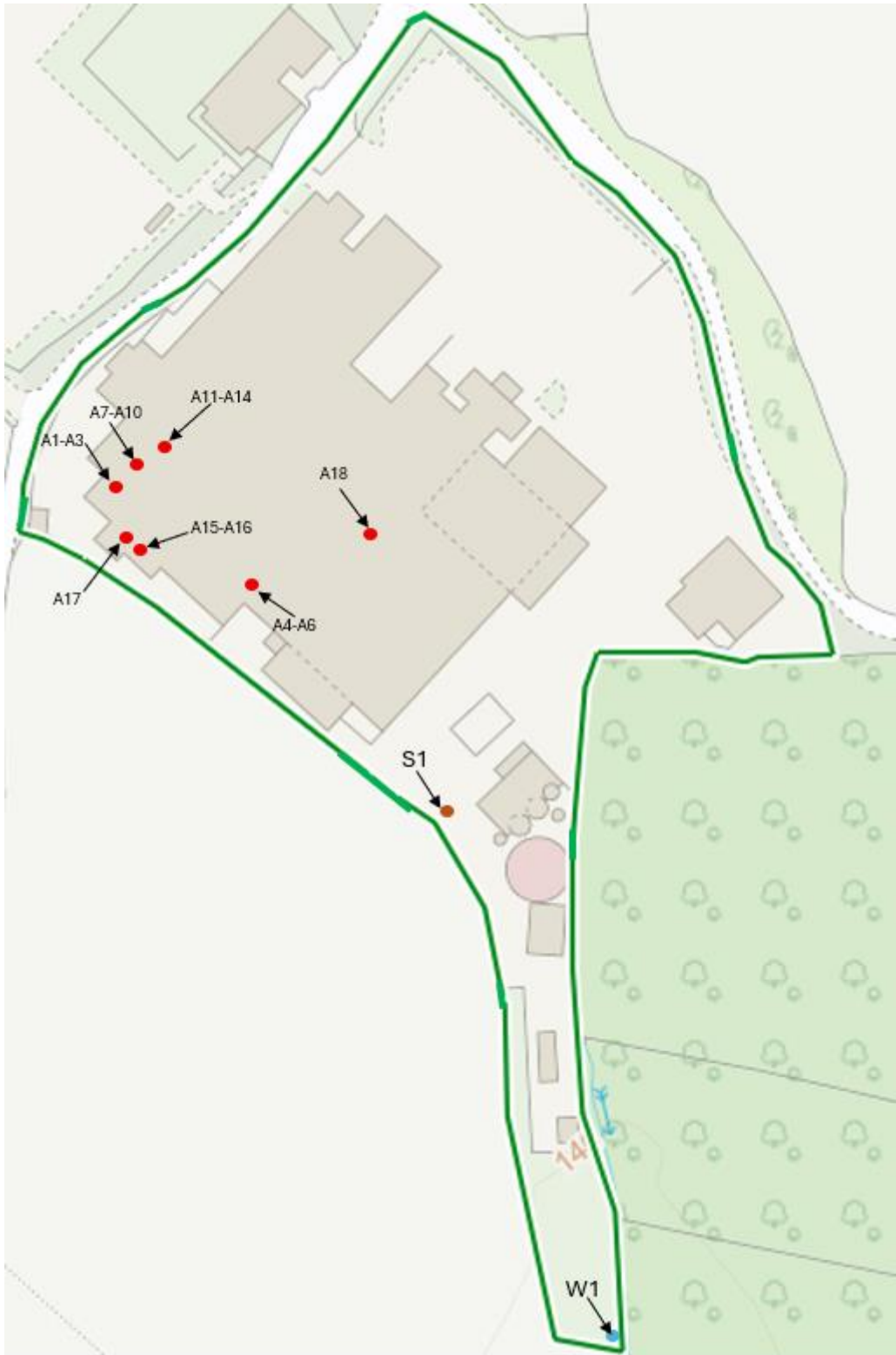
Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- 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; and/or

- in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content

“year” means calendar year ending 31 December.

Schedule 7 – Site plan



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