

Natural Resources Wales permitting decisions

Variation and Consolidation of a bespoke Permit – Princes Limited

We have decided to issue a variation and consolidated permit for Princes Soft Drinks Division in Cardiff operated by Princes Limited.

The permit number is EPR/BX8289IW.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

The permit has been varied following the publication of the revised Best Available Techniques (BAT) Reference Documents (BREF) for Food, Drink and Milk Industries. The associated BAT conclusions to this document were published on 4 December 2019 in the Official Journal of the European Union.

This variation incorporates the changes required by the Industrial Emissions Directive following a statutory review of permits in the Food, Drink and Milk sector. These include the amendment of the wording of several permit conditions relating to notifications, changes to emissions limits and monitoring requirements.

We are satisfied that the operator will be compliant with the published BAT conclusions which will apply from 4 December 2023.

Purpose of this document

This decision document:

- explains how we have carried out our statutory review of the Operator's Permit;
- why we have decided to vary the Permit as a result of that review; and
- why we have included the specific conditions in the revised Permit through the variation notice we are issuing.

It is our record of our decision-making process, to show how we have taken into account all relevant factors in reaching our position.

Structure of this document

- Assessment of the installation against the published BAT conclusions for Food, Drink and Milk Industries.
- Annex 1 – Decision Checklist regarding relevant BAT Conclusions for Food, Drink and Milk Industries

Assessment of Princes Soft Drinks Division – Cardiff against the published BAT conclusions for Food, Drink and Milk Industries

1. Our decision

We have issued a variation, which will allow the Operator to operate the installation, subject to the conditions in the varied permit.

The variation does three things:

- it consolidates the original permit to reflect changes made through earlier variations;
- it brings the permit into line with our modern regulatory template; and
- it varies the permit where appropriate to reflect the outcome of our statutory review and incorporate Best Available Techniques (BAT) and Associated Emission Limit Values (BAT-AELs).

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

The original permit, issued on 05/05/2005, ensured that the installation, employed BAT and ensured a high level of protection for human health and the environment. We have altered the permit as a result of the statutory review, and we are confident that the new requirements will deliver a superior level of protection to that which was previously

achieved. Where a site is not currently compliant with BAT, Improvement Conditions have been included to bring the site up standard by 4 December 2023.

2. The legal framework

The variation and consolidation Notice (which includes the consolidated permit as Schedule 2) will be issued under Regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 (EPR). The environmental permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

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

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

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

3. How we reached our decision

Requesting information to demonstrate compliance with BAT Conclusion techniques

We issued a Notice under Regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 on 28 April 2020 requiring the operator to provide information to demonstrate how the operation of their installation currently meets, or will subsequently meet, the revised standards described in the relevant BAT Conclusions document.

The Regulation 61(1) Notice required the operator to:

- Describe the techniques that will be implemented before 4 December 2023, which will then ensure that operations meet the revised standard, or
- Justify why standards will not be met by 4 December 2023, and confirmation of the date when the operation of those processes will cease within the installation or an

explanation of why the revised BAT standard is not applicable to those processes,
or

- Justify why an alternative technique will achieve the same level of environmental protection equivalent to the revised standard described in the BAT Conclusions.
- Where their permitted activity involves the use, production or release of a hazardous substance, as defined in Article 3(18) of the Industrial Emissions Directive, the Operator was required to carry out a risk assessment considering the possibility of soil and groundwater contamination at the permitted installation with such substances. Where risk of such contamination is established prepare a baseline report containing information necessary to determine the state of soil and groundwater contamination so as to make a quantified comparison with the state upon definite cessation of the activity.
- Where their permitted activity involves the use, production, storage or release of priority hazardous substances and any other relevant substances., as defined by the Water Framework Directive, the Operator was required to carry out a risk screening assessment considering the presence of priority hazardous substances at the permitted installation. Where a risk of these substances is established the operator is to sample the effluent and screen for the priority hazardous substances. If these substances are found to be present in the effluent stream, then assessment using the H1 tool and potential detailed modelling will be required to demonstrate that the effluent discharge will not have a significant impact to the receiving water.

Where the operator proposed that they were not intending to meet a BAT standard, that also included a BAT Associated Emission Level (BAT-AEL) described in the Food, Drink and Milk BAT Conclusions Document, the Regulation 61(1) Notice requested that the operator make a formal request for derogation from compliance with that AEL (as provisioned by Article 15(4) of IED). In this circumstance, the Notice identified that any such request for derogation must be supported and justified by sufficient technical and commercial information that would enable us to determine acceptability of the derogation request.

The Regulation 61(1) Notice response from the operator was received on 11/11/2020. Additional information was received on 03/02/2021 as part of response to a Schedule 5 Notice for a variation application (PAN-012974) on 01/02/2022

We considered that the response contained sufficient information for us to commence

determination of the permit review. The operator made no claim for commercial confidentiality. We have not received any information in relation to the Regulation 61(1) Notice response that appears to be confidential in relation to any part.

4. Key issues/Regulation 61 response

BAT Conclusions for the Food, Drink and Milk Industries were published as Commission Implementing Decision EU 2019/2031 in the Official Journal of the EU on 4 December 2019. There are 37 BAT Conclusions. Annex 1 provides a record of decisions made in relation to each relevant BAT Conclusion applicable to the installation. This should be read in conjunction with the permit/variation notice issued.

A detailed response was received from the Operator. Where the operator has concluded that they have achieved BAT, and we are in agreement, no further information or justification has been sought by Natural Resources Wales.

Baseline site condition report

Where their permitted activity involves the use, production or release of a hazardous substance, as defined in Article 3(18) of the Industrial Emissions Directive, the Operator was required to carry out a risk assessment considering the possibility of soil and groundwater contamination at the permitted installation with such substances. Where risk of such contamination is established prepare a baseline report containing information necessary to determine the state of soil and groundwater contamination so as to make a quantified comparison with the state upon definite cessation of the activity.

The Operator has submitted a revised site condition report (ECL.046.01.01/SCR) to Natural Resources Wales in support of their permit variation application. This provides a summary of the environmental conditions present at the installation accounting for the change in the Environmental Permit boundary. A site investigation comprising geotechnical and contamination analysis was undertaken in 2017. The SCR also lists potentially polluting substances stored on-site and the protection measures in place to prevent pollution incidents. The potentially polluting substances include fruit juice concentrate, process effluent, caustic and glycol. According to the Operator there have been no recorded pollution incidents at the installation. We consider this appropriate and no further controls are required such as an improvement condition.

5. Changes we have made

Improvement Conditions

Based on the information provided in the Regulation 61(1) response, we consider that the operator has demonstrated compliance by 2023 and we do not need to set improvement conditions.

Other changes

All previous variations have been consolidated and a new permit issued in modern condition format. There have been changes to the operating techniques table within the permit to reflect the information provided in the Regulation 61(1) response.

Operational Changes

No operational changes have been made as part of this sector review. However, there are changes as a result of the application made by the Operator. These are detailed within the main body of the corresponding decision document reference: EPR-BX8289IW-V004 Decision Document Substantial variation.

Capacity creep

The Operator has submitted the maximum capacity at the installation and an updated risk assessment as part of the permit variation application and schedule 5 response.

Medium Combustion Plant (MCP) / Specified Generator (SG)

The installation has an existing MCP listed in Table S1.1 as a Directly Associated Activity with a stack emission point (A1) in Table S3.1. The existing boiler is a natural gas boiler with 4.02 MWth input. Emission Limit Values (ELVs) and monitoring for existing MCPs is not required until 1st January 2025 at the earliest. As this is some way off, we decided to maintain any existing ELVs and monitoring requirements in the permit and not to impose new stricter ELVs ahead of time.

The installation also has one new MCP listed in Table S1.1 with emission point A2 in Table S3.1. The new boiler is a natural gas boiler with 4.02 MWth input, as this is a new MCP, the requirements of the MCP Directive apply now.

Please see substantial variation decision document for details on determination of the MCP

Emissions to Water

As part of our delivery of the Water Framework Directive requirements, we need to identify and assess the impact for all discharges to surface waters and/or sewer from

the site for priority hazardous substances and any other relevant substances. The emissions monitoring for these substances should be carried out using the methods and standards described in the M18 guidance on “Monitoring of discharges to water and sewer”.

With reference to the risk assessment guidance on the gov.uk website entitled “Surface water pollution risk assessment for your environmental permit” (accessible via: <https://www.gov.uk/guidance/surface-water-pollution-risk-assessment-for-your-environmental-permit>) the company carried out the following assessments:

- Screening tests for priority hazardous pollutants and any other relevant priority hazardous substances.
- For any substance which is not screened out by the screening tests further modelling, as described in the risk assessment guidance “Surface water pollution risk assessment for your environmental permit”.

The Operator has one discharge of process effluent to sewer (S1), their discharge includes the following priority hazardous substances:

- Cadmium
- Mercury

The substances were screened out by the Phase 1 screening tests and therefore there was no need to carry out Phase 2 modelling, as described in the H1 assessment (ECL.046.01.01_H1) submitted with the permit variation application.

There are no direct emissions to a receiving water body associated with the permitted activity therefore as per BAT Conclusion 12 the BAT-AELs do not apply.

Emissions to Water – Article 15(4) Derogations

No derogations.

Emissions to Air

The Emission Limit Values (ELVs) for emissions to air for the permitted activity are unchanged taking into account BAT conclusions from the Food, Drink and Milk BREF.

Emissions to Air – Article 15(4) Derogations

No derogations.

Other IED BREFs relevant to the permit review

There are no specific listed activities within Table S1.1 of the permit that are within scope of other published BREFS.

6. Conclusion

We consider that the installation already employed what used to be BAT, and that the operator has achieved significant improvements in performance since the permit was originally granted. The revised BREF and its BAT-AELs provide the opportunity to consider further environmental improvements.

Coupled with the consolidation and modernisation of the permit, we believe this variation provides a sound basis for ongoing regulation of the installation and we are satisfied that the operator is currently achieving or will be achieving all relevant BAT by 4 December 2023.

We believe that we have ensured compliance with all relevant legal requirements in carrying out this review and making our determination on the variation.

Annex 1: Decision checklist regarding relevant BAT Conclusions for Food, Drink and Milk Industries

BAT Conclusions for the Food, Drink and Milk Industries were published as Commission Implementing Decision EU 2019/2031 in the Official Journal of the EU on 4 December 2019. There are 37 BAT Conclusions. This checklist provides a record of decisions made in relation to each relevant BAT Conclusion applicable to the installation. This annex should be read in conjunction with the permit.

All BAT Conclusions arising are listed by number in order below;

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
OVERALL ENVIRONMENTAL PERFORMANCE			
1	Environment Management System (EMS) – <u>ALL</u> of the following:		
	I.	Commitment, leadership and accountability of the management, including senior management for the implementation of an effective EMS	Currently compliant The Operator has a Quality, Safety, Health and Environment (QSHE) management system which is externally certified to ISO 14001. The Operator has stated that this will be updated to take account of the permit variation.
	II.	An analysis that includes the determination of the organisation's context, the identification of the needs and expectations of interested parties, the identification of characteristics of the installation that are associated with possible risks for the environment (or human health) as well as of the applicable legal requirements relating to the environment.	
	III.	Development of an environmental policy that includes the continuous improvement of the environmental performance of the installation	
	IV.	establishing objectives and performance indicators in relation to significant environmental aspects, including safeguarding compliance with applicable legal requirements;	

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
	V.	Planning and implementing the necessary procedures and actions (including corrective and preventive actions where needed), to achieve the environmental objectives and avoid environmental risks;	
	VI.	Determination of structures, roles and responsibilities in relation to environmental aspects and objectives and provision of the financial and human resources needed;	
	VII.	Ensuring the necessary competence and awareness of staff whose work may affect the environmental performance of the installation (e.g. by providing information and training);	
	VIII.	Internal and external communication	
	IX.	Fostering employee involvement in good environmental management practices;	
	X.	Establishing and maintaining a management manual and written procedures to control activities with significant environmental impact as well as relevant records;	
	XI.	Effective operational planning and process control;	
	XII.	Implementation of appropriate maintenance programmes;	
	XIII.	Emergency preparedness and response protocols, including the prevention and/or mitigation of the adverse (environmental) impacts of emergency situations;	
	XIV.	When (re)designing a (new) installation or a part thereof, consideration of its environmental impacts throughout its life, which includes construction, maintenance, operation and decommissioning;	
	XV.	Implementation of a monitoring and measurement programme, if necessary, information can be found in the Reference Report on Monitoring of Emissions to Air and Water from IED Installations;	
	XVI.	Application of sectoral benchmarking on a regular basis;	

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
	XVII.	Periodic independent (as far as practicable) internal auditing and periodic independent external auditing in order to assess the environmental performance and to determine whether or not the EMS conforms to planned arrangements and has been properly implemented and maintained;	
	XVIII.	Evaluation of causes of nonconformities, implementation of corrective actions in response to nonconformities, review of the effectiveness of corrective actions, and determination of whether similar nonconformities exist or could potentially occur;	
	XIX.	Periodic review, by senior management, of the EMS and its continuing suitability, adequacy and effectiveness;	
	XX.	Following and taking into account the development of cleaner techniques.	
	(i)	Noise Management Plan (BAT 13)	See BAT 13
	(ii)	Odour Management Plan (BAT 15)	See BAT 15
	(iii)	Inventory of water, energy and raw materials consumption as well as of waste water and waste gas streams (BAT 2)	See BAT 2
	(iv)	Energy Efficiency Plan (BAT 6a)	See BAT 6a
2	Establish and maintain a waste water and waste gas inventory as part of the EMS - <u>ALL</u> of the following:		
	Information about the food, drink and milk production processes, including;		
	I.(a)	simplified process flow sheets that show the origin of the emissions	Currently Compliant The QSHE management system includes a requirement to report environmental performance, objectives, targets and planned improvements.
	I.(b)	descriptions of process-integrated techniques and waste water/waste gas treatment techniques to prevent or reduce emissions, including their performance	
	II.	Information about water consumption and usage and identification of actions to reduce water consumption and waste water volume (BAT 7)	The Operator has identified measures to reduce water consumption and waste water volume including:

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
			- Water recycling or reuse e.g. during CIP final rinse water is recovered for reuse in the pre-rinse tank - Optimisation of water flow - Optimisation of chemical dosing and water use in CIP - Optimised design of new equipment and process areas to facilitate cleaning
	Information on quantity and characteristics of the waste water streams, such as:		
	III.(a)	Average values and variability of flow, pH and temperature	Currently Compliant
	III.(b)	Average concentration and load values of relevant pollutants/parameters (e.g. TOC/COD, nitrogen species, phosphorus, chloride, conductivity) and their variability	The Operator has stated that waste water is monitored in accordance with their permit which includes effluent flow, pH, suspended solids and chemical oxygen demand. Monitoring is also undertaken for cadmium and mercury.
	Information on characteristics of waste gas streams, such as:		
	IV.(a)	Mean and variability of:	Currently Compliant The waste gas streams are monitored as per the current environmental permit requirements.
		Flow	
		temperature	
	IV.(b)	Mean concentration, load and variability of relevant substances:	
		Dust	
		TVOC	
		CO	
		NOx	
		SOx	

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
	IV.(c)	Presence of other substances that may affect the waste gas treatment system or plant safety:	
		O2	
		Water vapour	
		Dust	
	V.	Information about energy consumption and usage, the quantity of raw materials used, as well as the quantity and characteristics of residues generated, and identification of actions for continuous improvement of resource efficiency (BAT 6 and BAT 10)	Currently Compliant The Operator operates the installation according to a QSHE management system which includes monitoring energy usage, raw material usage and waste generated. The management system is used to set, monitor and review environmental objectives and key performance indicators with an annual report produced to identify improvements.
	VI.	Identification and implementation of an appropriate monitoring strategy with the aim of increasing resource efficiency, taking into account energy, water and raw materials consumption. Monitoring can include direct measurements, calculations or recording with an appropriate frequency. The monitoring is broken down at the most appropriate level (e.g. at process or plant/installation level).	
MONITORING			
3	For relevant emissions to water as identified by the inventory of waste water streams (BAT 2): monitor key process parameters at key locations		
	Key process parameters		
	Waste water flow		Currently Compliant The Operator does not discharge any process effluent direct to surface water. Process effluent is discharged to foul sewer in accordance with the EPR permit and Trade Effluent Consent. This includes monitoring of effluent flow, pH,
	pH		
	Temperature		
	Key monitoring locations		
	Pre-treatment inlet and/or outlet		

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
	Final treatment inlet		Suspended Solids and Chemical Oxygen Demand. In addition, mercury and cadmium are also monitored.
	Discharge point (to the environment)		
	Other location		
4	Monitoring of water emissions: monitor emissions to water with at least the frequency given below and in accordance with EN standards:		Not Applicable The site does not discharge process effluent direct to surface water, therefore as per Note 2 no further monitoring is required. Chloride monitoring is not required as per the UK Regulators Interpretation Document.
	Refer to monitoring emissions to water table in BRef document		
5	Refer to monitoring emissions to air table in BRef document Monitoring parameters depend on sector		Not Applicable No monitoring parameters applicable to the soft drink sector.
6	Energy Efficiency: BAT is to use 6a and appropriate combination of common techniques		
	a.	Energy Efficiency Plan	Compliant in the future The Operator has stated that an energy efficiency plan will be adopted by 4 December 2023. This will form part of the QSHE management system and include monitoring of performance on a monthly basis and review against annual KPIs with planned periodic improvement targets.
	b.	Use of common techniques	Currently Compliant The Operator has stated the following techniques are or will be implemented by 4 December 2023: Regular inspection and maintenance of equipment and plant to achieve optimum efficiency

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
			• Optimising operational planning to streamline equipment and plant use • Use of energy efficient LED lighting • Use of economisers on package system boilers • Two of three air compressors possess variable speed drive (VSD) • Use of VSD inverters for motor drive and pumps • Mains cold water and cooling water pumps are VSD • Dry air coolers will be used in cooling water system • Reducing boiler blowdown • Proposed new boiler will have VSD feed pumps and burner combustion fan • Employees will be trained in importance of energy management and basic energy saving practices • Future plans to install solar panels if deemed feasible.
7	Water consumption and waste water discharge BAT is to use 7a and one or a combination of techniques in b to k		Currently Compliant The Operator has stated they use the following techniques to reduce water consumption and waste water discharge:
	a.	Water recycling and/or reuse	
	b.	Optimisation of water flow	
	c.	Optimisation of water nozzles and hoses	
	d.	Segregation of water streams	
	e.	Dry cleaning	

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
	f.	Pigging system for pipes	- Water recycling or reuse e.g. during CIP, final rinse water is recovered for reuse in the pre-rinse tank - Optimisation of water flow - Optimisation of chemical dosing and water use in CIP - Optimised design of new equipment and process areas to facilitate cleaning
	g.	High-pressure cleaning	
	h.	Optimisation of chemical dosing and water use in cleaning-in-place (CIP)	
	i.	Low-pressure foam and/or gel cleaning	
	j.	Optimised design and construction of equipment and process areas	
	k.	Cleaning of equipment as soon as possible	
8	Harmful substances. BAT is to use one or a combination of the techniques given below:		Currently Compliant - Operator optimised design of new equipment and process areas to facilitate cleaning - Caustic is re-used and final rinse water is captured for first rinses to minimise waste.
	a.	Proper selection of cleaning chemicals and/or disinfectants	
	b.	Reuse of cleaning chemicals in cleaning-in-place CIP	
	c.	Dry cleaning	
	d.	Optimised design and construction of equipment and process areas	
9	BAT is to use refrigerants without ozone depletion potential and with a low global warming potential		Currently Compliant The Operator has stated that they use refrigerants such as water without ozone depletion potential and with a low global warming potential.
10	Increase resource efficiency, use one or a combination of the techniques given below		Currently Compliant The Operator has stated that effluent is contained in a storage tank and then tankered off-site for anaerobic digestion. In addition, following improvement works, the following effluent will either be redirected to rework or to the storage tank: Inter-batch flushing of premix tanks
	a.	Anaerobic digestion	
	b.	Use of residues	
	c.	Separation of residues	
	d.	Recovery and reuse of residues from pasteuriser	
	e.	Phosphorus recovery as struvite	
	f.	Use of waste water for land spreading	

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
			- Any residual product in the rework tanks at the end of a production run - Any scrapped carton contents from the packing lines
EMISSIONS TO WATER			
11	Prevent uncontrolled emissions to water, provide an appropriate buffer storage capacity for waste water		Currently Compliant The Operator has stated that a waste water storage tank with 30,000 litre capacity has been installed. They have also confirmed that the storage tanks on-site are compliant with CIRIA C736. The Operator has also stated that they intend to install an appropriate isolation system for the main trade effluent outflow from the installation at S1 to ensure that in the unlikely event of a major spill on site, the spill will be contained within the site boundary and will not be discharged to foul sewer.
12	Reduce emissions to water, use an appropriate combination of the techniques given below		
	a.	Equalisation	Currently Compliant The Operator has stated that they transfer effluent off-site for anaerobic digestion. In addition, following improvement works, they intend that the following effluent will either be redirected to rework or the storage waste tank: - Inter-batch flushing of premix tanks - Any residual product in the rework tanks at the end of the production run
	b.	Neutralisation	
	c.	Physical separation	
	d.	Aerobic and/or anaerobic treatment	
	e.	Nitrification and/or denitrification	
	f.	Partial nitrification	
	g.	Phosphorus recovery as struvite	

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
	h.	Precipitation	Any scrapped carton contents from the packing lines
	i.	Enhanced biological phosphorus removal	
	j.	Coagulation and flocculation	
	k.	Sedimentation	
	l.	Filtration	
	m.	Flotation	
	BAT-AELs for direct emissions to a receiving water body. Table 1 and associated notes. Associated monitoring given in BAT 4.		
	Chemical oxygen demand COD	25–100 mg/L	Not Applicable No direct emissions of process effluent to a receiving water body. All process effluent discharge to sewer under a trade effluent consent
	Total suspended solids TSS	4–50 mg/L	
	Total nitrogen	2–20 mg/L	
	Total phosphorus	0.2–2.0 mg/L	
NOISE			
13	Set up, implement, and regularly review a Noise Management Plan (as part of the EMS) where nuisance is expected and/or has been substantiated. Include ALL of the following:		Currently Compliant The Operator has stated that noise emissions are not considered significant and therefore a noise management plan is not required.
	I.	A protocol containing actions and timelines	
	II.	A protocol for conducting noise emissions monitoring	
	III.	A protocol for response to identified noise events, e.g. complaints	
	IV.	A noise reduction programme designed to identify the source(s), to measure/estimate noise and vibration exposure, to characterise the contributions of the sources and to implement prevention and/or reduction measures.	
14	Techniques to prevent, or where not practicable reduce noise and vibration emissions. Use one or a combination of the following:		

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
	a.	Appropriate location of equipment and buildings	Currently Compliant The Operator has stated that the following measures are used: • Appropriate location of equipment – processing activities undertaken within the site buildings • Regular inspection and maintenance of equipment • Operation of equipment by experienced personnel • Closing of doors when not in use • Avoidance of potentially noisy activities during night-time hours where possible • Use of low noise equipment where possible • Training of all staff and contractors to report any identified abnormal noise levels on site to enable the cause to be addressed immediately
	b.	Operational measures – see examples	
	c.	Low-noise equipment – see examples	
	d.	Noise control equipment – see examples	
	e.	Noise abatement – see examples	
ODOUR			
15	Set up, implement, and regularly review an Odour Management Plan (as part of the EMS) where nuisance is expected and/or has been substantiated. Include ALL of the following:		Currently Compliant The Operator has stated that odour emissions are not considered significant and therefore an odour management plan is not required.
	I.	Protocol with actions and timelines	
	II.	Odour monitoring protocol	
	III.	Odour complaint response plan/protocol	
	IV.	Odour prevention and reduction programme	
BAT CONCLUSIONS FOR SOFT DRINKS AND NECTAR/JUICE MADE FROM PROCESS FRUIT AND VEGETABLES			

BATc number	Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
33	In order to increase energy efficiency, BAT is to use an appropriate combination of the techniques specified in BAT 6 and of the techniques given below.	
	a.	Single pasteuriser for nectar/juice production Currently Compliant Pasteurisers can supply multiple lines depending on requirement & pasteurisers are specified for the products planned to be produced e.g. pH, particles, viscosity.
	b.	Hydraulic sugar transportation The site only uses liquid sugar. Homogeniser was specified to be energy efficient this has not yet been commissioned.
	c.	Energy-efficient homogeniser for nectar/juice production
Indicative	Indicative environmental performance levels for specific energy consumption Table 23	
	0.01–0.035 MWh/hl of products	Indicative Currently Compliant The Operator has stated they are currently achieving 0.0069MWh/hl. y.
	Indicative environmental performance levels for specific waste water discharge Table 24	
	0.08–0.20 m ³ /hl of products	Indicative Currently Compliant The Operator has stated they are currently achieving 0.07m ³ /hl..

DRAFT

Annex 2: Consultation on the draft decision where an Article 15(4) derogation has been applied

Not Applicable

DRAFT