

Natural Resources Wales permitting decisions

2 Sisters Food Group Limited (Sandycroft Poultry Processing) Decision Document

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Normal Variation

The variation number is: EPR/YP3632EM/V005

The application number is: PAN-020545

The applicant / operator is: 2 Sisters Food Group Limited

**The Installation is located at: Sandycroft Poultry Processing, Glendale Avenue,
Sandycroft, Deeside, Flintshire**

We have decided to issue the variation for Sandycroft Poultry Processing operated by 2 Sisters Food Group Limited.

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.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template

1. Outline of the application

1.1. Existing permitted facility

Sandycroft Poultry Processing is a combined poultry slaughterhouse and processing facility which processes an average of 134,000 live birds per day. The permitted activities listed above include lairage, slaughter and primary processing including bleeding, scalding, de-feathering and evisceration. Also included is the storage and management of products and wastes and treatment of the effluent generated during the process.

The regulated facility is an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations:

- Section 6.8 Part A (1)(b) – Slaughtering animals at a plant with a carcass production capacity of more than 50 tonnes per day.
- Section 6.8 Part 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;
- Section 5.4(1)(a)(ii) – Disposal of non-hazardous waste in a facility with a capacity exceeding 50 tonnes per day – by physico-chemical treatment

Existing Directly Associated Activities (DAAs) include:

- Cleaning
- Waste Handling
- Boilers (combustion of natural gas for steam generation, total thermal output of 4.6 MW)

1.2. Proposed changes

The operator has applied to vary the existing permit to update the permit's Operating Techniques following a review of the site's operations, this includes an update Noise Management Plan and new loading bay extension. The purpose of the loading bay extension is to allow for waste, which includes animal by-products, to be loaded to

bulk trailers under cover to prevent amenity issues which are currently being addressed with the use of a temporary inflatable structure.

The operator has also applied to modernise and consolidate the permit with previous permit variations and update the permit to include all existing emission points, notably the wet chemical scrubber and sludge scrubber which have been installed to mitigate odour emissions.

The application also originally included a request for early permitting of the sites boilers as existing Medium Combustion Plants (MCP). However, this change was removed from the scope of the application due to queries over whether the MCP could be classed as 'existing'. See email dated 17/05/202 ([saved to the public register here](#)) for more information.

2. Receipt of the application

In order for us to be able to consider the application duly made, we needed more information. We requested:

- Clarification on the installation's directly associated activities
- An updated site plan
- Further information relating to the site's existing Medium Combustion Plant
- The current OPRA score spreadsheet
- The correct application fee

Upon receipt of this information, on 15/03/2023, we were able to consider the application duly made. This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we would need to complete that determination.

No claim for commercial or industrial confidentiality has been made nor have we identified information provided as part of the application that we consider to be confidential.

3. Consultation

As this application is for a normal variation, no consultation was required.

4. Legislation

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

- an installation as described by the IED;
- subject to aspects of the Well-Being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 which also have to be addressed.

NRW is satisfied that our decision is compatible with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources.

All applicable European directives have been considered in the determination of the application.

5. The site

The existing site is located in Glendale Business Park, Sandycroft, Flintshire and is surrounded by a mix of industrial and residential property.

The installation site boundary is not changing as part of this variation, the operator has however provided an updated site plan which details the installations emission points. This includes the addition of the existing chemical wet scrubber and sludge scrubber. The addition of these emission points will be discussed in more detail in section 8 of this document. The updated site plan will be included in the varied permit.

6. Environment Management System

The Applicant has stated in the application that following the variation they will have in place an Environmental Management System (EMS) that will meet the requirements for an EMS in our guidance "*How to comply with your environmental permit guidance*". The Applicant submitted a summary of the EMS with their application which we consider satisfactory.

There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions following this permit variation. The decision was taken in accordance with RGN 5 on Operator Competence.

7. Impact on National Site Network, Sites of Special Scientific Interest (SSSI), non-statutory conservation sites

The following National Site Network Sites were identified within 10km of the installation:

- River Dee and Bala Lake Special Area of Conservation (SAC) (England and Wales)
- Dee Estuary SAC (England and Wales)
- Deeside and Buckley New Sites SAC
- The Dee Estuary Special Protection Areas (SPA) (England and Wales)
- The Dee Estuary Ramsar Site (England and Wales)

There are no changes to the installation's emissions as a result of this variation. The applicant has proposed to add emission points to air but it is not considered these will have an environmental impact for reasons outlined in section 8.1.

A Habitats Regulations Assessment (HRA) is not required because there is no conceivable impact pathway as a result of this proposed variation to any National Site Network Sites/Ramsar sites.

The following SSSIs and non-statutory conservation sites are located within 10km of the installation:

- River Dee SSSI
- The River Dee Local Wildlife Site
- Various Ancient Woodland sites

The proposed permission is not likely to damage any of the flora, fauna or geological or physiological features which are of special interest because there is no impact pathway as a result of this proposed variation.

8. Environmental Risk Assessment

8.1 Emissions to Air

As part of this variation, the permit will be updated to add the following existing emissions to air:

- A3 – Wet Chemical Scrubber
- A4 – Sludge Scrubber
- A5 - A8 – Lairage and Hangan Stack
- A9 – A15 – Lairage Roof Vents
- A16 – A22 – Evisceration Roof Vent

The wet chemical scrubber and sludge scrubber are existing point source emission to air are for abatement of odour only (see section 8.3).

The Lairage and Hangan Stack and roof vents and evisceration roof vents are existing emission points which would have been considered during the original permit application.

There is no anticipated impact on air quality as a result of this variation as there are no changes to existing air emissions.

The emission points will be added to the permit for information but will not have any associated emission limits or monitoring requirements.

8.2 Emissions to Water

This variation will not add or change any existing emissions to water. Therefore, there is no anticipated impact on water quality as a result of this variation.

The drainage for the new loading bay will be connected to the existing internal effluent drains which are connected to the onsite Effluent Treatment Plan (ETP). There is no increased risk of water pollution as a result of the new loading bay.

8.2 Odour

A previous NRW led variation to the permit set an improvement condition for the Operator to review the sites Odour Management Plan (OMP) and establish what

represents Best Available Techniques (BAT) for the prevention and minimisation of odour emissions from the site (variation number V002, issued on 28/09/2012). In response to this, the Operator submitted a final BAT review in August 2012 which identified that a wet chemical scrubber to abate odour installed to abate odour from the scald and de-feather process constitutes BAT. A further NRW led variation (variation number V003, issued on 28/11/2012) set improvement conditions for the chemical scrubber to be commissioned. This improvement condition was confirmed as complete on 28/10/2013 (as detailed in Compliance Assessment Report dated 04/11/2013).

As well as the scald and de-feather process, the wet chemical scrubber also abates odour from the evisceration area, screen and solids reception and tanks at the effluent treatment plant, and from the waste tankers via a temporary connection.

The site also benefits from a sludge scrubber which extracts and abates odorous process air from the sludge treatment plant operations (effluent tanks and sludge tanks which are also treated by the wet chemical scrubber) and also the blood tank.

The variation seeks to incorporate these scrubber outlets as a point source emission to air on the permit. There is no anticipated increase in risk of odour pollution as a result of this change as the scrubbers are existing.

The proposed loading bay extension is not anticipated to increase the risk of odour pollution at the site as the animal by-products that will be exported here will be refrigerated and stored for less than 8 hours out of direct sunlight, and hence are not considered to be a source of significant odour.

The Operator has submitted an updated Odour Risk Assessment with this application to review their activity with respect to odour. An odour monitoring programme has been undertaken to quantify odour emissions from the site and assesses the performance of the odour abatement methods described above. This will inform a further assessment which will review the findings of the monitoring to inform a new Odour Management Plan and consider if further improvements are required. The

ongoing assessment will help assess against the upcoming new BAT reference document for the sector which is currently in draft.

Conditions 3.3.1 of the permit requires odour from the activities to be below that which could cause pollution outside the site.

8.3 Noise

As part of this variation, the Operator has proposed no changes to the permit which will increase the risk of noise pollution from the site. The new loading bay is anticipated to minimise some of the site's noise by allowing some waste to be collected by trucks indoors.

The site has been subject to noise complaints in the past and in response to this a Noise Impact Assessment (NIA) was completed in 2021 which recommended an acoustic barrier be put in place to mitigate noise. As part of this application a new Noise Management Plan (NMP) has been proposed. NRW have reviewed this document for the purpose of adding it to the permit's Operating Techniques have concluded it does not meet the requirements set out in [Noise and vibration management: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/noise-and-vibration-management-environmental-permits). Whilst the document aims to address the results of the NIA, the NMP references acoustic barriers as mitigation options when the application states that local residents objected to this on a visual basis. Therefore, this does not seem to represent realistic mitigation options. To be incorporated into the permit, the NMP needs to also consider noise from the whole site and include all the expected sections.

We therefore consider it appropriate to include an improvement condition in the permit which requires the operator to provide a new NMP and carry out an updated NIA (once the new loading bay extension has been constructed) to inform this. Please see Annex 1 for more information.

Conditions 3.4.1 of the permit requires noise from the activities to be below that which could cause pollution outside the site.

8.4 Fugitive emissions

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise fugitive emissions and to prevent pollution from fugitive emissions from loading bay extension.

The site has experienced issues in the past with pests (seagulls) accessing animal by-product waste from the loading bay and depositing these wastes in the local environment. This issue is currently being mitigated with the use of a temporary inflatable structure in agreement with NRW (agreed until 30/09/2023 at time of writing this report, as per Compliance Assessment Report dated 03/04/2023). The loading bay extension will reduce risk of pests by permanently covering the area where animal by-products are loaded.

9. Operating Techniques

The operator has reviewed the existing operating procedures and the proposed loading bay extension against the Best Available Techniques (BAT) conclusions outlined in the reference document for BAT in the Slaughterhouses and Animal By-products Industries dated May 2005.

The operator has reviewed the new loading bay extension against the relevant BAT conclusions and has concluded they are compliant where:

- The extension has been designed and constructed to ensure it is easy to clean (BATc 5.1.1 (r))
- It will allow animal by-products to be enclosed during loading and transport (BATc 5.1.1 (v))
- It demonstrates the use of sealed storage, handling and charging facilities for animal by-products (BATc 5.3 (b))

The operator has also reviewed site operations against the draft reference Best Available Techniques (BAT) conclusions outlined in the reference document for BAT in the Slaughterhouses and Animal By-products Industries dated June 2021. A full review of full site operations will be completed when the updated BAT reference document has been published and a permit review is initiated by NRW

10. The Permit Conditions

10.1 Updating the permit conditions during consolidations

We have updated previous permit conditions to those in the new generic permit template as part of permit consolidation.

10.2 Incorporating the variation

We have specified that the operator must operate the permit in accordance with descriptions in the application. The relevant descriptions have been specified in the Operating Techniques table (Table S1.2). It has been noted in the permit that previous Operating Techniques may be superseded by those proposed in this application.

10.3 Improvement conditions

As discussed in section 8.3, the variation will add improvement conditions relating to a NIA and NMP (see Annex 1).

10.4 Waste types

There are no changes to the permits specified waste types following this variation

10.5 Raw materials

There are no changes to the permit specified raw materials following this variation.

10.5 Monitoring and Reporting

We have made changes to the monitoring requirements for point source emissions to sewer (Table S3.3). Changes include:

- Reduction of monitoring frequency of Chemical Oxygen Demand (COD) from “once per shift” to daily in line with modern permit requirements
- MCERTS monitoring standards for Total daily volume discharge and COD in line with condition 3.5.3 of the permit.

15. OPRA

The OPRA score remains unchanged following this permit variation (57).

Annex 1 Improvement Conditions

Table S1.3 Improvement program requirements

Reference	Requirement	Date
16a	Following establishment of a routine steady operation following the construction of the new covered loading bay, the Operator shall undertake a noise impact assessment for the whole site following BS4142:2014 and guidance set out in Noise and Vibration Management: Environmental Permits. The assessment should include an objective assessment of narrow band (FFT) measurements to identify any tonal elements from on-site sources and off-site at sensitive receptors. The assessment should include consideration of the Welsh Government's Noise and Soundscape Action Plan 2018-2023. Upon completion of the work, a written report shall be submitted to Natural Resources Wales for approval.	Within 6 months of construction of the new loading bay or as otherwise agreed by Natural Resources Wales
16b	Following completion of IC16a, a Noise Management Plan for the whole site shall be submitted to Natural Resources Wales. This shall be completed in line with guidance set out in Noise and Vibration Management: Environmental Permits.	Within 3 months of completion of IC16a or as otherwise agreed by Natural Resources Wales