

Our Ref: EPR/XP3830UR

Mr Neil Shawcross
The First Milk Cheese Company Limited
Haverfordwest Creamery
Pembroke Road
Merlin's Bridge
Haverfordwest
Pembrokeshire
SA61 1JN

Date: 16th January 2024

Dear Mr Shawcross

EPR- XP3830UR First Milk (Haverfordwest Creamery) Improvement Conditions Review

Thank you for submitting First Milks response to discharge the requirements of Improvements Condition (IC) 10 of the environmental permit EPR/XP3830UR.

- Email received on 02/06/2023 from Neil Shawcross (First Milk) with response to IC10.
- Documents received from First milk:
- IC10 FMCC Haverfordwest Improvement Condition 10 – BAT 9 – June 2023

As you are aware, ICs were included as part of a recent permit review and variation (V006 issued 08/04/2022) following the publication of the revised Best Available Techniques (BAT) Reference Documents (BREF) for Food, Drink and Milk Industries. Improvement Conditions have been included to bring the site up to the necessary standard.

We have reviewed the response to IC10.

The Operator shall submit to Natural Resources Wales an updated written procedure following additional investigatory work describing how they intend to meet the following BAT requirements in accordance with the requirements specified within:

- IC10**
- ***BAT Conclusion 9 of the Food, Drink and Milk Industries BRef Document (EU 2019) – In order to prevent emissions of ozone depleting substances and of substances with a high global warming potential from cooling and freezing, BAT is to use refrigerants without ozone depletion potential and with a low global warming potential***

The report should include but not limited to:

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- ***a review of the use of the current refrigerant(s) as to whether they meet the BAT requirements as specified above and;***
 - ***a feasibility study and implementation plan (if appropriate) regarding the replacement of the current refrigerant(s) with one with a lower global warming potential and no ozone depletion potential. Suitable alternatives include but not limited to ammonia, water and carbon dioxide.***

The report shall be submitted to Natural Resources Wales by the date specified for review. Natural Resources Wales will review the report to determine if the above BAT requirements have been achieved.

The report submitted to NRW provides information in response to IC10. However, additional information is required.

Please see the following comments:

- Refrigerants with high Global Warming Potential (GWP) are still being used at site. R404A used in the walk-in lab freezer in particular is a banned F gas for refilling equipment. Further information is available on [gov.uk website](https://www.gov.uk).

Based on the response provided, the walk in lab freezer along with other refrigerant systems will be replaced at end of life with the lowest feasible GWP refrigerant system. Please provide details on types of refrigerants/systems planned as a replacement to be implemented on site. You need to include details regarding timeframes for the replacement of these units as part of an implementation plan and must ensure to implement systems with the lowest practical GWP refrigerants.

- Please list any ozone depleting substances and their ratings. If none, please confirm.

You will need to review and submit a response/updated document to NRW by the 30/01/2024 (unless otherwise agreed in writing with NRW).

Yours sincerely



**Kirsty Thomas
Lead Specialist – Industry Regulation**

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Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.