

Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Cambrian Pet Foods Limited

**Llangadog Pet Foods Plant
Tywi Valley Food Park
Station Road
Llangadog
Carmarthenshire
SA19 9LN**

Permit number
EPR/CB3091HY

Llangadog Pet Foods Plant

Permit number EPR/CB3091HY

Introductory note

This introductory note does not form a part of the permit

The main features of the permit are as follows.

The Llangadog Pet Foods Plant is located west of the village centre of Llangadog and approximately 36 km north of Swansea city centre. The installation is located within the Tywi Valley Food Park which is predominantly industrial with the Llangadog railway station located in the centre. The site lies within the boundary of Carmarthenshire County Council. The surrounding areas are predominantly rural countryside with the Afon Tywi running north to south directly west of the installation, the Afon Bran flows in a westerly direction within the southern part of the installation to join the Afon Tywi. The closest residential receptor is located within 20 m of the north east of the installation boundary. The installation footprint is approximately 16 acres and is located on the former Llangadog creamery site. Prior to this A(1) installation permit, the site operated under a Part B installation permit regulated by the Local Authority and a Consent to Discharge (Consent Number BG0002801) to the Afon Tywi regulated by NRW.

The site is within 10 km of the Afon Tywi Special Area of Conservation (SAC) and within 2 km of the Afon Tywi Site of Special Scientific Interest (SSSI), Derwen Fach SSSI and Chwarel Talar Wen SSSI.

The Llangadog Pet Foods Plant manufactures canned (chunks and loaf) and tray pet food. This involves:

- Receiving, storage and initial preparation of the ingredients (meat, fish and dry ingredients)
- Main processing – breaking, mincing, mixing, emulsifying, extruding and cooking (sterilisation)
- Packing and storage of final products before onward distribution

The manufacturing process is supported by the use of an ammonia plant for refrigeration purposes. The ammonia plant has a capacity of 2 tonnes of ammonia and provides freezing to eight plate freezers, refrigeration units provide chilling for the cold store chiller and freezer. The installation has two natural gas-fuelled boilers that provide steam to the manufacturing process. The main boiler has a thermal input of 10.2 MW and is operated continuously (8760 hours per year), this is classed as an existing Medium Combustion Plant (MCP) as it was put into operation prior to 20 December 2018. The second boiler is a back-up boiler and has a thermal input of 9.0 MW and is to be operated less than 500 hours per year and only when the main boiler is unavailable. The back-up boiler is classed as a new MCP as it was put into operation after 20 December 2018. There are two emission points to air, one from each of the combustion sources (A1 and A2). There is one emission point to surface water (S1) (Afon Tywi) from the on-site effluent treatment plant.

The installation is not connected to the municipal foul sewer network and is served by two separate drainage systems:

- All process effluent for pet food production processes and surface water run-off from external surfaces is directed through the effluent treatment plant and then discharged to the Afon Tywi.
- Foul water from administrative areas is directed to a cesspit for storage prior to collection.

The Environment Management System is not externally accredited to ISO14001 although has been developed in-line with the requirements. The company has an underlying Climate Change Agreement (FDF1/T00933).

The operator has a separate groundwater abstraction licence (Licence Serial No.: WA/060/0001/005) to abstract water from five boreholes within the site and a surface water abstraction licence (Licence Serial No.: 22/60/1/0083) to abstract from one point from the Afon Tywi and another point from the Afon Bran. The purposes of both abstractions are for commercial, processing and washing operations involving evaporative cooling.

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

Status log of the permit		
Description	Date	Comments
Application EPR/CB3091HY/A001	11/09/19	Application received
Application EPR/CB3091HY/A001	Duly made 10/03/20	
Additional information received	09/04/20	Revision of air emissions risk assessment.
Regulation 61 (1) Notice sent to Operator	24/06/20	Issue of a Notice under Regulation 61(1) of the EPR following the publication of the Best Available Techniques (BAT) Reference Document (BRef) for the Food, Drink and Milk Industries.
Additional information received	25/08/20	Information related to water quality assessment, site plan and medium combustion plant.
Regulation 61 (1) Notice response	19/10/20	Response received from the operator.
Additional information received	08/12/20	Best Available Techniques assessment, production and effluent treatment capacity
Permit issued EPR/CB3091HY/A001	04/03/21	Permit issued to Cambrian Pet Foods Limited.

End of introductory note

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/CB3091HY

The Natural Resources Body for Wales (“Natural Resources Wales”) authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016

Cambrian Pet Foods Limited (“the operator”),

whose registered office is

Suite 1

3rd Floor

11 – 12 St James’s Square

London

SW1Y 4LB

company registration number **01624292**

to operate an installation at

Llangadog Pet Foods Plant

Tywi Valley Food Park

Station Road

Llangadog

Carmarthenshire

SA19 9LN

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

Signed

Date

Holly Noble	01/03/2021
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Authorised on behalf of Natural Resources Wales

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”).

2.1.2 Waste authorised by this permit shall be clearly distinguished from any other waste on the site.

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.

2.2.2 For the following activity, reference A9 in schedule 1, table S1.1, no MCP shall be operated beyond the site of the grid reference specified for it in schedule 1, table S1.1 of the permit.

2.3 Operating techniques

2.3.1 (a) 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 Natural Resources Wales.

(b) If notified by Natural Resources Wales that the activities are giving rise to pollution, the operator shall submit to Natural Resources Wales 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 Natural Resources Wales.

2.3.2 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.

2.3.3 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.

2.3.4 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.3.5 For the following activity reference A9 in schedule 1, table S1.1 the activity shall be operated using the techniques and, in the manner, described in schedule 1, table S1.2A.

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 Natural Resources Wales.

- 2.4.2 Except in the case of an improvement which consists only of a submission to Natural Resources Wales, the operator shall notify Natural Resources Wales 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 and S3.2.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Where a substance is specified in schedule 3 table S3.2 but no limit is set for it, the concentration of such substance in emissions to water from the relevant emission point shall be no greater than the background concentration.
- 3.1.4 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.
- 3.1.5 For the following activity reference A9 in schedule 1, table S1.1 the limited operating hours MCP shall:
- (a) not exceed 500 hours operation in a 12-month period as a rolling average over a 3-year period, and thereafter assessed annually
 - (b) not operate for more than 750 hours in any single year

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 Natural Resources Wales that the activities are giving rise to pollution, submit to Natural Resources Wales 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 Natural Resources Wales.
- 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 Natural Resources Wales, 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 Natural Resources Wales that the activities are giving rise to pollution outside the site due to odour, submit to Natural Resources Wales 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 Natural Resources Wales.

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 Natural Resources Wales, 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 Natural Resources Wales that the activities are giving rise to pollution outside the site due to noise and vibration, submit to Natural Resources Wales 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 Natural Resources Wales.

3.5 Monitoring

3.5.1 The operator shall, unless otherwise agreed in writing by Natural Resources Wales, undertake the monitoring specified in the following tables in schedule 3 to this permit:

- (a) point source emissions specified in tables S3.1 and S3.2

3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by Natural Resources Wales.

3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1 and S3.2 unless otherwise agreed in writing by Natural Resources Wales.

3.5.5 For the following activity, reference A9 in schedule 1, table S1.1 the first monitoring measurements will be carried out within four months of the issue date of the permit variation or the date when the MCP is first put into operation whichever is later.

3.5.6 For the following activity, reference A9 in schedule 1, table S1.1 monitoring 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 Natural Resources Wales, submit to Natural Resources Wales for approval within the period specified, a pests management plan which identifies and minimises risks of pollution, hazard or annoyance from pests;
- (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by Natural resources Wales

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 Natural Resources Wales, 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 Natural Resources Wales.

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

4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by the permit to Natural Resources Wales using the contact details supplied in writing by Natural Resources Wales.

4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales by 31 January (or other date agreed in writing by Natural Resources Wales) 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 Natural Resources Wales, 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 Natural Resources Wales, 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 (a) In the event 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 Natural Resources Wales,
 - (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) in the event of a breach of any permit condition the operator must immediately—
- (i) inform Natural Resources Wales, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
- (c) in the event 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 (a)(i), or 4.3.1 (b)(i) where the information relates to the breach of a limit specified in the permit,] 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 Natural Resources Wales has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform Natural Resources Wales when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to Natural Resources Wales at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 Natural Resources Wales 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) Natural Resources Wales 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 Natural Resources Wales 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, Natural Resources Wales 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" or "without delay" 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
A1	S6.8 A1(d)(iii) – 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) – (iii) animal and vegetable raw materials, both in combined and separate products, with a finished product production capacity in tonnes per day greater than (aa) 75 if A is equal to 10 or more. Where 'A' is portion of animal material in percent of weight of the finished product production capacity.	Processing animal and vegetable raw materials for the production of wet pet foods.	From receipt and storage of raw materials to despatch of finished product from the installation. Finished product production capacity limited to: 180.24 tonnes per day.
A2	S5.4 A1 (a)(i) – Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving one or more of the following activities: (i) biological treatment	Treatment of process effluent and uncontaminated surface water drainage in an effluent treatment plant.	From receipt of process effluent and uncontaminated surface water into effluent treatment plant discharging to the Afon Tywi.
Directly Associated Activity			
A3	Steam generation	Steam supply: 1x 10.2 MWth input main boiler fuelled on natural gas – existing MCP	From receipt of fuel to release of combustion products to air. Operating hours not restricted.
A4	Ammonia plant	Ammonia plant with a capacity of 2 tonnes of ammonia, provides freezing to eight plate freezers and refrigeration units	From receipt of ammonia to the ammonia plant to despatch of wastes. Storage limited to 2 tonnes of ammonia at any one time.
A5	Wastes storage and handling	Storage and handling of wastes	From generation of wastes to despatch of wastes.
A6	Refrigeration	Refrigeration of raw materials, finished products and product wastes	From receipt and storage of raw materials to despatch of finished product from the installation.

			From generation of wastes to despatch of product wastes.
A7	Chemicals storage and handling	Storage and handling of cleaning chemicals	From receipt and storage of chemicals to despatch of wastes.
A8	Heavy fuel oil storage and handling	Storage and handling of heavy fuel oil for use in fork lift trucks	From receipt and storage of heavy fuel oil to use in fork lift trucks.

Medium Combustion Plant

Activity reference	Activity listed in the EP Regulations	Description of MCP and/or Specified Generator	Limits of specified activity
A9 NGR: SN 69897 25813	Schedule 25A – Medium Combustion Plant as detailed in Schedule 8 and Specified Generator that is excluded	1x 9.0 MWth input back-up boiler fuelled on natural gas – new MCP	From receipt of fuel to release of combustion products to air. Operating hours restricted to <500 hours per annum.

Table S1.2 Operating techniques

Description	Parts	Date Received
Application	All responses to questions of Form B2 and Form B3 including all supporting documentation	11/09/19
Response to Not Duly Made letter dated 19/02/20	Document references: Boiler Technical Schedule 18/0576B Standard Operating Procedure Effluent Treatment Plant	03/03/20
Response to Regulation 61(1) Notice – request for information dated 24/06/2020 detailing how the Operator will comply with the BAT conclusions for Waste Treatment, under Directive 2010/75/EU of the European Parliament and of the Council	Best Available Techniques (BAT) assessment. Document references: ECL.073.02.01/BAT October 2020 ECL.073.02.01/BAT December 2020	19/10/20 and 08/12/20
Response to Regulation 61(1) Notice – request for information dated 24/06/2020 detailing how the Operator will comply with the BAT conclusions for the Food, Drink and Milk Industries, under Directive 2010/75/EU of the European Parliament and of the Council	Best Available Techniques (BAT) assessment. Document references: ECL.073.02.01/BAT October 2020 ECL.073.02.01/BAT December 2020	19/10/20 and 08/12/20

Table S1.2A Operating techniques for Medium Combustion Plant as detailed in Schedule 8

Description
Each MCP must be operated in accordance with the manufacturer's instructions and records must be made and retained to demonstrate this
The operator must keep periods of start-up and shut-down of each MCP as short as possible

There must be no persistent emission of 'dark smoke' as defined in Section 3(1) of The Clean Air Act 1993

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC1	<p>The Operator shall submit to Natural Resources Wales an updated written procedure(s) following additional investigative work describing how they intend to meet the following BAT requirements in accordance with requirements specified within:</p> <ul style="list-style-type: none"> BAT Conclusion 2 of the Waste Treatment BRef Document (EU 2018) – (a) Set up and implement waste characterisation & pre-acceptance procedures BAT Conclusion 3 of the Waste Treatment BRef Document (EU 2018) – Inventory of waste water BAT Conclusion 2 of the Food, Drink and Milk Industries BRef Document (EU 2019) - Inventory of waste water 	4 June 2023 or otherwise agreed in writing with Natural Resources Wales
IC2	<p>The Operator shall submit to Natural Resources Wales an updated written procedure(s) following additional investigative work describing how they intend to meet the following BAT requirements in accordance with requirements specified within:</p> <ul style="list-style-type: none"> BAT Conclusion 19 of the Waste Treatment BRef Document (EU 2018) – optimise water consumption, to reduce the volume of waste water generated and to prevent or, where that is not practicable, to reduce emissions to soil and water 	4 June 2023 or otherwise agreed in writing with Natural Resources Wales
IC3	<p>The Operator shall produce an accident management plan to incorporate all the activities covered by this permit in accordance with:</p> <ul style="list-style-type: none"> BAT Conclusion 1 and BAT Conclusion 21 of the Waste Treatment BRef Document (EU 2018) <p>The Operator shall submit the accident management plan to Natural Resources Wales for approval by the date specified.</p>	6 months from date of permit issue
IC4	<p>The Operator shall submit to Natural Resources Wales a written procedure(s) describing how they intend to meet the following BAT requirements in accordance with requirements specified within BAT Conclusions of the Food, Drink and Milk Industries BRef Document (EU 2019):</p> <ul style="list-style-type: none"> BAT Conclusion 12 – BAT-AELs for direct emissions to a receiving water body 	4 June 2022 or otherwise agreed in writing with Natural Resources Wales
IC5(a)	<p>The Operator shall install an MCERTS certified flow meter in line with the requirements set out in Technical Guidance Note (TGN) M18: Monitoring of discharges to water and sewer by the date specified in IC5(b). The meter shall be installed and operational and MCERTS certified by the date specified in IC5(b). An interim report shall be submitted to Natural Resources Wales detailing progress towards this by the date specified in IC5(a).</p>	6 months from permit issue
IC5(b)	<p>Upon completion of IC5(a). A copy of the results of the MCERTS audit and the accreditation shall be submitted to Natural Resources Wales by the date specified.</p>	12 months from permit issue
IC6	<p>The Operator shall update its existing Environment Management System to incorporate the following BAT requirements in accordance with:</p> <ul style="list-style-type: none"> BAT Conclusion 1 (vii), (viii), (ix) of the Waste Treatment BRef Document (EU 2018) and; BAT Conclusion 1 (xiv), (xvi), (xx) of the Food, Drink and Milk Industries BRef Document (EU 2019) <p>The Operator shall submit the updated Environment Management System to Natural Resources Wales for approval by the date specified.</p>	4 June 2022 or otherwise agreed in writing with Natural Resources Wales

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC7	<p>The Operator shall submit to Natural Resources Wales an updated written procedure(s) following additional investigative work describing how they intend to meet the following BAT requirements in accordance with requirements specified within:</p> <ul style="list-style-type: none">• BAT Conclusion 23 of the Waste Treatment BRef Document (EU 2018) – (b) Energy Balance Record	4 June 2023 or otherwise agreed in writing with Natural Resources Wales
IC8	<p>The Operator produce a Residues Management Plan to incorporate the following BAT requirements in accordance with:</p> <ul style="list-style-type: none">• BAT Conclusion 1 (xii) and BAT Conclusion 24 of the Waste Treatment BRef Document (EU 2018) <p>The Operator shall submit the Residues Management Plan to Natural Resources Wales for approval by the date specified. Description of 'residues management plan' is given in Section 6.5 of the Waste Treatment BRef Document (EU 2018).</p>	4 June 2023 of otherwise agreed in writing with Natural Resources Wales

Schedule 2 - Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels

Raw materials and fuel description	Specification
Animal and vegetable raw materials	-
Natural gas	-

Schedule 3(a) – Emissions and monitoring effective until 3 December 2023

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

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1 [point A1 on site plan in Schedule 7]	Main boiler - 10.2 MWth input natural gas fuelled Cochran boiler	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	100 mg/m ³ ^{Note 1}	Periodic (average over one hour)	Every 3 years	BS EN 14792
		Carbon monoxide	No limit set ^{Note 1}	Periodic (average over one hour)		BS EN 15058
A2 [point A2 on site plan in Schedule 7]	Back-up boiler – 9.0 MWth input natural gas fuelled boiler	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	No limit set ^{Note 1}	Periodic (average over one hour)	Once every 1500 hours of operation with a minimum frequency of once every five years	BS EN 14792
		Carbon monoxide	No limit set ^{Note 1}	Periodic (average over one hour)		BS EN 15058

Note 1: Monitoring requirements are defined at a temperature of 273.15 K, a pressure of 101.3 kPa and after correction for the water vapour content of the waste gases at a standardised O₂ content of 6 % for solid fuels, 15 % for engines and gas turbines and 3 % all other MCPs

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 (including unit)	Reference Period	Monitoring frequency	Compliance statistic	Monitoring standard or method
S1 [point S1 on site plan in Schedule 7 emission to Afon Tywi]	Effluent Treatment plant processing process effluent and uncontaminated surface water drainage	Oil and grease	None visible	Instantaneous (visual examination)	Once every week	None visible	Visual check
		pH	6 – 8.5	Instantaneous (spot sample)	Continuous	Minimum and maximum	BS EN 10523
		Temperature	29 °C	Instantaneous (spot sample)	Continuous	Maximum	Standard thermocouple
		Total aluminium as Al	1.0 mg/L	Instantaneous (spot sample)	Once every week	Maximum	BS EN ISO 11885
		Biological oxygen demand (BOD)	40 mg/L	Instantaneous (spot sample)	Once every week	Maximum	BS EN 1899-1

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 (including unit)	Reference Period	Monitoring frequency	Compliance statistic	Monitoring standard or method
		Total phosphorus as P	15 mg/L	Instantaneous (spot sample)	Once every week	Annual mean	BS EN 15681-1 or BS EN ISO 15681-2
		Ammoniacal nitrogen (expressed as N)	30 mg/L	Instantaneous (spot sample)	Once every week	Maximum	BS EN ISO 11732
		Total suspended solids	40 mg/L	Instantaneous (spot sample)	Once every week	Maximum	BS EN 872
		Maximum daily discharge volume	1000 m ³ /day	Total daily volume	Continuous	Maximum	MCERTS certified flow meter

Schedule 3(b) – Emissions and monitoring effective from 4 December 2023

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

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1 [point A1 on site plan in Schedule 7]	Main boiler - 10.2 MWth input natural gas fuelled Cochran boiler	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	100 mg/m ³ ^{Note 1}	Periodic (average over one hour)	Every 3 years	BS EN 14792
		Carbon monoxide	No limit set ^{Note 1}	Periodic (average over one hour)		BS EN 15058
A2 [point A2 on site plan in Schedule 7]	Back-up boiler – 9.0 MWth input natural gas fuelled boiler	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	No limit set ^{Note 1}	Periodic (average over one hour)	Once every 1500 hours of operation with a minimum frequency of once every five years	BS EN 14792
		Carbon monoxide	No limit set ^{Note 1}	Periodic (average over one hour)		BS EN 15058

Note 1: Monitoring requirements are defined at a temperature of 273.15 K, a pressure of 101.3 kPa and after correction for the water vapour content of the waste gases at a standardised O₂ content of 6 % for solid fuels, 15 % for engines and gas turbines and 3 % all other MCPs

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 (including unit)	Reference Period	Monitoring frequency	Compliance statistic	Monitoring standard or method
S1 [point S1 on site plan in Schedule 7 emission to Afon Tywi]	Effluent Treatment plant processing process effluent and uncontaminated surface water drainage	Oil and grease	None visible	Instantaneous (visual examination)	Once every week	None visible	Visual check
		pH	6 – 8.5	Instantaneous (spot sample)	Continuous	Minimum and maximum	BS EN 10523
		Temperature	29 °C	Instantaneous (spot sample)	Continuous	Maximum	Standard thermocouple
		Total aluminium as Al	1.0 mg/L	Instantaneous (spot sample)	Once every week	Maximum	BS EN ISO 11885
		Biological oxygen demand (BOD)	40 mg/L	24-hour flow proportional composite	Once every month	Maximum	BS EN 1899-1

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 (including unit)	Reference Period	Monitoring frequency	Compliance statistic	Monitoring standard or method
		Chemical oxygen demand (COD)	100 mg/L	24-hour flow proportional composite	Once every day or other frequency as agreed in writing with NRW	Maximum	BS 6068-2.34
		Total phosphorus as P	2.0 mg/L	24-hour flow proportional composite	Once every day or other frequency as agreed in writing with NRW	Maximum	BS EN 15681-1 or BS EN ISO 15681-2
		Total nitrogen as N	20 mg/L	24-hour flow proportional composite	Once every day or other frequency as agreed in writing with NRW	Maximum	BS EN 12260 or BS EN ISO 11905-1
		Total suspended solids	40 mg/L	24-hour flow proportional composite	Once every day or other frequency as agreed in writing with NRW	Maximum	BS EN 872
		Chloride (Cl ⁻)	No limit set	24-hour flow proportional composite	Once every month	No limit set	EN ISO 6878 or EN ISO 15681-1 or EN15681-2 or EN ISO 11885 or other method as agreed in writing with NRW
		Maximum daily discharge volume	1000 m ³ /day	Total daily volume	Continuous	Maximum	MCERTS certified flow meter

Schedule 4(a) – Reporting effective until 3 December 2023

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
Emissions to air	A1	Every 3 years	1 January
Parameters as required by condition 3.5.1.	A2	Once every 1500 hours or once every five years whichever comes first	1 January
Emissions to water	S1	Every 3 months	1 January, 1 April, 1 July, 1 October
Parameters as required by condition 3.5.1			

Table S4.2: Annual production/treatment	
Parameter	Units
Canned and tray wet pet food products	tonnes

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	tonnes
Energy usage	Annually	MWh
Total raw material used	Annually	tonnes
Waste produced	Annually	tonnes

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
Air	Form air 1 or other form as agreed in writing by Natural Resources Wales	04/03/21
Water and Land	Form water 1 or other form as agreed in writing by Natural Resources Wales	04/03/21
Water usage	Form water usage 1 or other form as agreed in writing by Natural Resources Wales	04/03/21
Energy usage	Form energy 1 or other form as agreed in writing by Natural Resources Wales	04/03/21
Other performance indicators	Form performance 1 or other form as agreed in writing by Natural Resources Wales	04/03/21

Schedule 4(b) – Reporting effective from 4 December 2023

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
Emissions to air Parameters as required by condition 3.5.1.	A1	Every 3 years	1 January
	A2	Once every 1500 hours or once every five years whichever comes first	1 January
Emissions to water Parameters as required by condition 3.5.1	S1	Every 3 months	1 January, 1 April, 1 July, 1 October

Table S4.2: Annual production/treatment

Parameter	Units
Canned and tray wet pet food products	tonnes

Table S4.3 Performance parameters

Parameter	Frequency of assessment	Units
Water usage	Annually	tonnes
Energy usage	Annually	MWh
Total raw material used	Annually	tonnes
Waste produced	Annually	tonnes
Generation of residues	Annually	tonnes
Generation of wastewater	Annually	m ³

Table S4.4 Reporting forms

Media/parameter	Reporting format	Date of form
Air	Form air 1 or other form as agreed in writing by Natural Resources Wales	04/12/23
Water and Land	Form water 1 or other form as agreed in writing by Natural Resources Wales	04/12/23
Water usage	Form water usage 1 or other form as agreed in writing by Natural Resources Wales	04/12/23
Energy usage	Form energy 1 or other form as agreed in writing by Natural Resources Wales	04/12/23
Other performance indicators	Form performance 1 or other form as agreed in writing by Natural Resources Wales	04/12/23

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	EPR/CB3091HY
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any activity that gives rise to an incident or accident which significantly affects or may significantly affect the environment	
To be notified within 24 hours	
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 permit condition	
To be notified within 24 hours	
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) In the event 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:	
To be notified within 24 hours	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B - to be submitted as soon as practicable

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

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 - Interpretation

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

“Annex I” means Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“Annex II” means Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“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 Natural Resources Wales 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.

“background concentration” means such concentration of that substance as is present in:

- for emissions to surface water, the surface water quality up-gradient of the site; or
- for emissions to sewer, the surface water quality up-gradient of the sewage treatment works discharge.

“building” means a construction that has the objective of providing sheltering cover and minimising emissions of noise, particulate matter, odour and litter.

“combined heat and power” or *“CHP”* or *“Cogeneration”* means the simultaneous generation in one process of thermal energy and electrical or mechanical energy

“disposal” or *“D”* means any of the operations provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“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 or background concentration limit.

“first put into operation” means that the plant must have been fired with its design fuel up to its full load. This can be, but does not have to be, during commissioning.

“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.

“hazardous property” has the meaning in Annex III of the Waste Framework Directive

“hazardous waste” has the meaning given in the Hazardous Waste (Wales) Regulations 2005 (as amended)

“hazardous substance” means a substance classified as hazardous as a consequence of fulfilling the criteria laid down in parts 2 to 5 of Annex I to Regulation (EC) No 1272/2008

“impermeable surface” means a surface or pavement constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the pavement surface

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions

“limited operating hours MCP” means an MCP that meets the requirements of paragraph 8 of Part 2 of Schedule 25A of the EP Regulations

“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.

“Medium Combustion Plant Directive” or “MCPD” means Directive 2015/2193/EU of the European Parliament and of the Council of the limitation of emissions of certain pollutants into the air from medium combustion plants.

“Natural gas” means naturally occurring methane with no more than 20 % by volume of inert or other constituents

“operating hours” means the time, expressed in hours, during which a combustion plant is operating and discharging emissions into the air, excluding start-up and shut-down periods

“Pests” means Birds, Vermin and Insects.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“recovery” or “R” means any of the operations provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“residue” means the solid waste generated by the waste treatment activity and is not directly related to the type of waste treated in the plant

“sealed drainage system” in relation to an impermeable surface, means a drainage system with impermeable components which does not leak and which will ensure that:

- no liquids will run off the surface otherwise than via the system
- all liquids entering the system are collected in a sealed sump, except where liquids may be lawfully discharged

“specified generator” or “SG” means has the meaning given in paragraph 2(1) of Schedule 25B of the EP Regulations

“Waste code” means the six digit code referable to a type of waste in accordance with the list of wastes established by Commission Decision 2000/532/EC as amended from time to time (the ‘List of Wastes Decision’) and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste

“Waste Treatment BAT Conclusions” means the BAT Conclusions for the Waste Treatment sector published as a Commission Implementing Decision EU 2018/1447 in the Official Journal of the EU on 17 August 2018

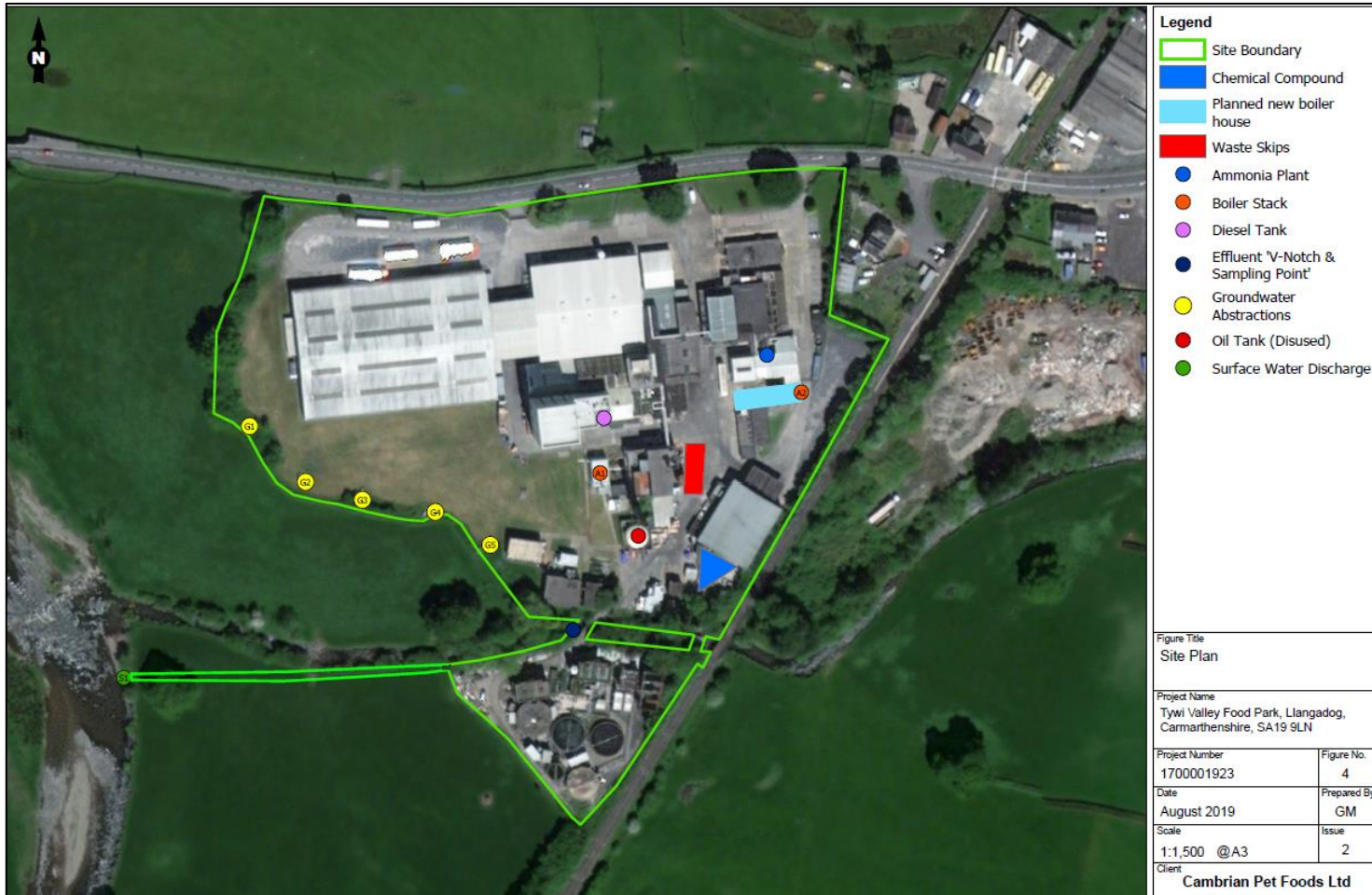
“year” means calendar year ending 31 December.

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:

- (a) in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273 K, at a pressure of 101.3 kPa and with an oxygen content of:
3 % for all other processes
- (b) in relation to emissions from non-combustion sources, the concentration at a temperature of 273 K and at a pressure of 101.3 kPa, with no correction for water vapour content

Schedule 7 - Site plan



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Schedule 8 – Annex 1 of MCPD

1. Rated thermal input (MW) of the medium combustion plant.	9.0 MW thermal input
2. Type of the medium combustion plant (diesel engine, gas turbine, dual fuel engine, other engine or other medium combustion plant).	Other medium combustion plant
3. Type and share of fuels used according to the fuel categories laid down in Annex II.	100 % Natural gas
4. Date of the start of the operation of the medium combustion plant or, where the exact date of the start of the operation is unknown, proof of the fact that the operation started before 20 December 2018.	Unknown, currently not operational
5. Sector of activity of the medium combustion plant or the facility in which it is applied (NACE code).	NACE 1092
6. Expected number of annual operating hours of the medium combustion plant and average load in use.	500 hours, 70 % average load in use
7. Where the option of exemption under Article 6(3) or Article 6(8) is used, a declaration signed by the operator that the medium combustion plant will not be operated more than the number of hours referred to in those paragraphs.	Yes
8. Name and registered office of the operator and, in the case of stationary medium combustion plants, the address where the plant is located.	Registered office address: Cambrian Pet Foods Limited, Suite 1, 3 rd Floor, 11-12 St James' Square, London, United Kingdom, SW1Y 4LB MCP Location: Llangadog Pet Foods Plant, Tywi Valley Food Park, Station Road, Llangadog, Carmarthenshire, SA19 9LN

END OF PERMIT