

Natural Resources Wales permitting decisions

Variation and Consolidation of a bespoke Permit – Lloyd's Animal Feeds (Western) Limited

We have decided to issue a Natural Resources Wales initiated variation and consolidated permit for Wrexham Mill in Bridge Road North, Wrexham Industrial Estate, Wrexham, LL13 9PS operated by Lloyd's Animal Feeds (Western) Limited.

The permit number is **EPR/AB3492ZQ**

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 Wrexham Mill 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 Wrexham Mill 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 the 15/04/2016 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 27th 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 the 11th November 2020 and additional information received on the 27th April 2021.

We considered that the response contained sufficient information for us to commence determination of the permit review. The operator made a claim for confidentiality in

their response. We had sent a request for more information on 31/12/2021 but the operator did not respond to this before or on the deadline (17/01/2022). We therefore did not have sufficient information to determine this as confidential (as per 14.22 of the Core guidance For the Environmental Permitting (England and Wales) Regulations 2016 (SI 2016 No 1154)).

We have not received any additional 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. Following assessment of the Regulation 61(1) response, further information was requested 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

A Baseline site condition report was not supplied with the regulation 61 response. The operator has confirmed that their Site condition report submitted in 2016 with the original application is still applicable to the site.

5. Changes we have made

Improvement Conditions

Based on the information provided in the Regulation 61(1) response, we consider that we need to set improvement conditions. These conditions are set out below. We are using these conditions to require the operator to provide Natural Resources Wales with details that need to be established or confirmed during operations. The improvement conditions ensure compliance by 2023.

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC1	The Operator shall submit to Natural Resources Wales an updated written procedure(s) describing how they intend to meet the following BAT requirements in accordance with requirements specified within: BAT Conclusion 14 of the Food, Drink and Milk Industries BRef Document (EU 2019) – Techniques to prevent, or where not practicable reduce noise and vibration emissions	4 June 2023 or otherwise agreed in writing with Natural Resources Wales
IC2	The Operator shall submit to Natural Resources Wales an updated written procedure(s) describing how they intend to meet the following BAT requirements in accordance with requirements specified within: BAT Conclusion 7 of the Food, Drink and Milk Industries BRef Document (EU 2019) - Water consumption and wastewater discharge	4 June 2023 or otherwise agreed in writing with Natural Resources Wales
IC3	The Operator shall submit to Natural Resources Wales an updated written procedure(s) describing how they intend to meet the following BAT requirements in accordance with requirements specified within: BAT Conclusion 2 of the Food, Drink and Milk Industries BRef Document (EU 2019) Establish and maintain a waste water and waste gas inventory as part of the EMS.	4 June 2023 or otherwise agreed in writing with Natural Resources Wales

IC1 has been included on the permit for the operator to demonstrate that the operator will be compliant with BAT 14. The operator has stated in their response that they will be compliant with BAT 13 and BAT 14 but did not give any details with regards to how they will comply with BAT 14.

IC2 has been included on the permit for the operator to demonstrate that the operator will be compliant with BAT 7. The operator has stated this as not as no water is not used in process however the operator also use water for lorry washing and boiler blow down, therefore we believe that the operator will need to be assessed and apply BAT 7 for these aspects of their site.

IC3 has been included on the permit for the operator to demonstrate that the operator will be compliant with BAT 2. The operator had also stated that BAT 2 IV-VI reporting of waste gas streams was not applicable however we disagree with this as the site has associated emissions to air.

Other changes

There were no improvement condition or pre-operational conditions on the previous version of the permit

Operational Changes

There are no operational changes to the site.

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

We have listed any existing MCPs/SGs in Table S1.1 & emission points in Table S3.1. ELVs and monitoring for existing MCPs & SGs is not required until 1st January 2029 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 has 1 x 3.6 MW (thermal input) gas boiler unit (installed 2004) for steam generation and listed on the permit as a directly associated activity. This is listed under emission point A4 but at present does not have emission limits in place, as this was built prior to 2016 and therefore at present not subject to the medium combustion plant directive.

Emissions to Water

The only emissions to water associated with the activity is uncontaminated rain water therefore not subject to BAT-AELs nor Water Framework Directive requirement in the Regulation 61(1) Notice.

Emissions to Water – Article 15(4) Derogations

No derogations

Emissions to Air

There were changes to the Emission Limit Values (ELVs) for emissions to air taking into account BAT conclusions from the Food, Drink and Milk BREF.

The tables below outline the parameters and limits set to implement the BAT-AELs:

Effective until 3 December 2023

Release point	Parameter	Limit/ BAT AEL	Effective until
A1	Total Particulate	30 mg/m ³	3 December 2023

A2	Total Particulate	30 mg/m ³	
A3	Total Particulate	30 mg/m ³	

Effective from 4 December 2023

Release point	Parameter	Limit/ BAT AEL	Effective from
A1	Total Particulate	20 mg/Nm ³	4 December 2023
A2	Total Particulate	20 mg/Nm ³	
A3	Total Particulate	20 mg/Nm ³	

Where BAT associated emission levels are identified (BAT-AELs), limits may be prescribed at the top end of the range unless the proximity of sensitive receptors requires a tighter limit or if tighter limits are previously on the permit, this ensures no backsliding of emission limits.

Emissions to Air – Article 15(4) Derogations

No derogations.

Other IED BREFs relevant to the permit review

There are no other listed activities within Table S1.1 of the permit.

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 stated that they have an EMS that covers all aspects of this BAT
	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.	

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
	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;	
	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;	

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
	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;	
	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 and BAT 14

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
	(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:		
	<i>Information about the food, drink and milk production processes, including;</i>		
	I.(a)	simplified process flow sheets that show the origin of the emissions	Currently Compliant. Applicant this aspect of the to the EMS.
	I.(b)	descriptions of process-integrated techniques and waste water/waste gas treatment techniques to prevent or reduce emissions, including their performance	Not applicable – no process waste water
	II.	Information about water consumption and usage and identification of actions to reduce water consumption and waste water volume (BAT 7)	See BAT 7
	<i>Information on quantity and characteristics of the waste water streams, such as:</i>		
	III.(a)	Average values and variability of flow, pH and temperature	Not applicable. No process water produced at the site
	III.(b)	Average concentration and load values of relevant pollutants/parameters (e.g. TOC/COD, nitrogen species, phosphorus, chloride, conductivity) and their variability	

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
	Information on characteristics of waste gas streams, such as:		
	IV.(a)	Mean and variability of:	Compliant in the future: The operator has stated that this is not applicable. However we disagree with this as the site has associated emissions.
		Flow	
		temperature	
	IV.(b)	Mean concentration, load and variability of relevant substances:	
		Dust	
		TVOC	
		CO	
		NOx	
		SOx	
	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 complaint the operator applies V and VI to the site (see BAT 6 and 10).
	VI.	Identification and implementation of an appropriate monitoring strategy with the aim of increasing resource	

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
		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		Not applicable no emissions to water of process effluent.
	pH		
	Temperature		
	Key monitoring locations		
	Pre-treatment inlet and/or outlet		Not applicable no waste water from processing.
	Final treatment inlet		
	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:		

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
	Refer to monitoring emissions to water table in BRef document	Not applicable no emissions to water of process effluent
5	Refer to monitoring emissions to air table in BRef document Monitoring parameters depend on sector	Currently compliant -currently monitor three emission points of pellet cooling annually and use the standard BS EN 13284-1 as outlined in BAT 5 for animal feed. Operator has stated that annual monitoring will “change in terms of number and duration of sampling under BS EN 13284-1”
6	Energy Efficiency: BAT is to use 6a and appropriate combination of common techniques	
	a.	Energy Efficiency Plan
	b.	Use of common techniques
Currently Compliant Operator applies these techniques in the existing EMS in place.		
7	Water consumption and waste water discharge BAT is to use 7a and one or a combination of techniques in b to k	
	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
	f.	Pigging system for pipes
	g.	High-pressure cleaning
Compliant in the future Operator has stated not relevant as no process water is used but the site has water consumption is used for lorry washing and boiler blow down.		

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.	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:		
	a.	Proper selection of cleaning chemicals and/or disinfectants	Currently compliant Operator currently uses Cleaning/disinfectant products approved for use under Industry food safe criteria/ Feed Industry standards
	b.	Reuse of cleaning chemicals in cleaning-in-place CIP	Not applicable
	c.	Dry cleaning	Not applicable
	d.	Optimised design and construction of equipment and process areas	Not applicable
9	BAT is to use refrigerants without ozone depletion potential and with a low global warming potential		Not Applicable – no refrigerants in use.
10	Increase resource efficiency, use one or a combination of the techniques given below		
	a.	Anaerobic digestion	Currently compliant The Operator has stated that any rejected loads are used in feed (unless found
	b.	Use of residues	
	c.	Separation of residues	
	d.	Recovery and reuse of residues from pasteuriser	

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
	e.	Phosphorus recovery as struvite	unsuitable for animal consumption), which fulfils the requirements of BAT 10 b.
	f.	Use of wastewater for land spreading	
EMISSIONS TO WATER			
11	Prevent uncontrolled emissions to water, provide an appropriate buffer storage capacity for wastewater		Not applicable No process wastewater is generated. All discharge to sewer regulated by local sewer undertaker. All surface water discharge is uncontaminated surface run off or vehicle wash down.
12	Reduce emissions to water, use an appropriate combination of the techniques given below		Not applicable No process wastewater is generated. All discharge to sewer regulated by local sewer undertaker. All surface water discharge is uncontaminated surface run off or vehicle wash down.
	a.	Equalisation	
	b.	Neutralisation	
	c.	Physical separation	
	d.	Aerobic and/or anaerobic treatment	
	e.	Nitrification and/or denitrification	
	f.	Partial nitrification	
	g.	Phosphorus recovery as struvite	
	h.	Precipitation	
	i.	Enhanced biological phosphorus removal	
	j.	Coagulation and flocculation	

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
	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
	Total suspended solids TSS	4–50 mg/L	Not applicable
	Total nitrogen	2–20 mg/L	Not applicable
	Total phosphorus	0.2–2.0 mg/L	Not applicable
	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 <u>ALL</u> of the following:		
	I.	A protocol containing actions and timelines	Currently compliant : Operator currently has a noise and vibration management plan in place to deal with noise and vibration events.
	II.	A protocol for conducting noise emissions monitoring	
	III.	A protocol for response to identified noise events, e.g. complaints	

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.	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:		Complaint in the future: The Operator did not state details on BAT 14 that they were complaint with. We therefore have put this in as an improvement condition.
	a.	Appropriate location of equipment and buildings	
	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 the OMP is used under EMS (BAT 1). Odour has not been an issue at site.
	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 ANIMAL FEED			

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
Indicative	Indicative environmental performance levels for specific energy consumption <i>Table 2 and footnotes</i>	
	Compound feed	0.01 – 0.10 MWh/tonne of products
	Dry pet food	0.39 – 0.50 MWh/tonne of products
	Wet pet food	0.33 – 0.85 MWh/tonne of products
16 (Green fodder only)	Increase energy efficiency in green fodder processing use an appropriate combination of the techniques specified in BAT 6 and of the techniques given below:	
	a.	Use of predried fodder
	b.	Recycling of waste gas from the dryer
	c.	Use of waste heat for predrying
Indicative	Indicative environmental performance levels for specific waste water discharge <i>Table 3</i>	
	Wet pet food	1.3 – 2.4 m ³ /tonne of products
17	Reduce channelled dust emissions to air, use one of the techniques given below:	
	a.	Bag filter
	b.	Cyclone

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
				Emission points for pellet cooling (A1-A3) are installed with the cyclones that meet the requirements of BAT 17b
	BAT-AELs for channelled dust emissions to air from grinding and pellet cooling in compound feed manufacture <i>Table 4 and its supporting notes. Monitoring requirements are outlined in BAT 5</i>			
	Dust – grinding	New plant: < 2–5 mg/N ³	Existing plant: < 2–10 mg/Nm ³	Not applicable: Extraction from grinding done by LEV, which exhausts back into the building, therefore not classified as an emission point on the permit and not classified a channelled dust emission to air.
	Dust – Pellet cooling	< 2–20 mg/Nm ³		Currently Compliant : The operator has stated that the site can currently meet the particulate BAT-AEL of 20 mg/Nm ³

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

Not Applicable