

Natural Resources Wales permitting decisions

Variation and Consolidation of a bespoke Permit – Farmers Boy (Deeside) Limited

We have decided to issue a Natural Resources Wales initiated variation and consolidated permit for Deeside Meat Processing in Unit 105/106, Tenth Avenue, Deeside Industrial Park, Deeside, Flintshire, CH5 2UA operated by Farmers Boy (Deeside) Limited.

The permit number is EPR/VP3235HS.

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 Deeside Meat Processing 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 Deeside Meat Processing 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 18/01/2012, 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 27/04/2020 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 30/10/2020 and additional information received on the 19/10/2021.

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

4. Key issues/Regulation 61 response

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

A detailed response was received from the Operator. 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

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

The Operator has provided an updated site condition report (SCR) as part of their response to the Regulation 61(1) Notice. The SCR follows the format of set out in [H5 Site condition report](#). The SCR has been reviewed and we are happy to accept it.

5. Changes we have made

Permit conditions

We have updated previous permit conditions to those in the new generic permit template as part of permit consolidation. The new conditions have the same meaning as those in the previous permit(s).

Conditions 3.6, 4.2.3 and 4.2.4 have been added to the permit. Table S3.4 has been added to schedule 3(b) of the permit. The description of activity S6.8 A(1) (d) (i) in table S1.1 has been updated to mirror changes in the Environmental Permitting Regulations (2016).

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.

IC7	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 a waste a gas inventory as part of the Environment Management System	4 June 2023 or otherwise agreed in writing with Natural Resources Wales
IC8	The Operator shall submit to Natural Resources Wales an updated written procedure following additional investigate work describing how they intend to meet the following BAT requirements in accordance with the requirements specified within: - 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 - a review of the use of the current refrigerant as to whether it meets the BAT requirements as specified above and; - a feasibility study and implementation plan (if appropriate) regarding the replacement of the current refrigerant 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.	4 June 2023 or otherwise agreed in writing with Natural Resources Wales

IC9	(a) The Operator shall submit to NRW the maximum capacity of the installation that was used in the most recent risk assessment submitted to NRW. (b) The Operator shall submit to NRW for approval the maximum capacity of the installation at the current time. (c) If the maximum capacity of the installation has increased from the time of the last submitted risk assessment and the current time, the Operator shall review and update the risk assessment to account for the current maximum capacity. The risk assessment shall be submitted to NRW for review. Notes: The capacity is to be taken and presented using the same units from the relevant sub-section of Section 6.8, Part 2, Schedule 1 of the Environmental Permitting Regulations 2016 (as from time to time amended). Capacity is to be taken as the maximum possible capacity of the installation, not the maximum actual production. The risk assessment should follow the methodology set out in The Environmental Risk Assessment (EPR-H1). You may use a methodology other than EPR-H1 however the methodology must address the same issues as in EPR-H1 to an equivalent level of detail.	(a) and (b) Within 6 months of permit variation issue (c) Within 9 months of permit variation issue (if applicable)
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IC7 has been included as the Operator did not provide sufficient information for us to be satisfied they are compliant or will be compliant with the BAT conclusion with regards to the waste gas streams only. See Annex 1 for more details. IC8 has been included as there are refrigerants in use with a high global warming potential, we have asked the Operator to review the use of these refrigerants and consider their replacement.

Other changes

The OPRA score has fallen from 98 to 78 because the site is no longer in a flood plain. The permit site plan has been updated to a version that shows all of the emission points.

We have added a requirement to process monitoring requirement of total volatile organic compounds (TVOC) emission load on smoker A9. This is to establish on an ongoing yearly basis whether the BAT-AEL/ELV applies to the smoker. In line with footnote 2 of BAT29 in the BREF, the TVOC BAT-AEL does not apply with the TVOC emission load is below 500 g/h. We have decided that chloride monitoring is required as per the interpretation document as chloride based chemicals are added during the effluent treatment process

Operational Changes

Capacity creep

We have included an improvement condition (IC 9) in order to establish the current maximum capacity at the installation and to determine if there has been a change since the last risk assessment submitted to NRW. If there has been an increase in the maximum capacity, what we call capacity creep, we have asked the Operator to review and update their risk assessment and submit to us for review. We have also implemented a maximum capacity limit into Table S1.1 of the permit in line with the IC response to prevent any further capacity creep at the installation.

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 2025 at the earliest. As this is some way off, we decided to maintain any existing ELVs and monitoring requirements in the permit and not to impose new stricter ELVs ahead of time.

The installation has two existing MCPs already listed in Table S1.1 as a Directly Associated Activity and with emission point (A1 and A2) in Table S3.1. The existing MCPs are natural gas boilers, each 6.5 MWth input. Emission Limit Values (ELVs) and monitoring for existing MCPs is not required until 1st January 2025 at the earliest. As this is some way off, we decided to maintain any existing ELVs and monitoring requirements in the permit and not to impose new stricter ELVs ahead of time.

Emissions to Water

As part of our delivery of the Water Framework Directive requirements, we need to identify and assess the impact for all discharges to surface waters and/or sewer from the site for priority hazardous substances and any other relevant substances. The emissions monitoring for these substances should be carried out using the methods and standards described in the M18 guidance on “Monitoring of discharges to water and sewer”.

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

- Screening tests for priority hazardous pollutants and any other relevant priority hazardous substances.

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

The site has a discharge to sewer of treated process effluent from their on-site effluent treatment plant. The site also has a discharge to surface water (River Dee) of uncontaminated surface water drainage.

The operator has assessed their discharge to sewer which eventually reaches the River Dee. The substances were screened out by the Phase 1 screening tests and therefore there was no need to carry out Phase 2 modelling, as described in H1 Annex D1.

The company used the H1 electronic screening tool to present the emissions data and to carry out the Phase 1 screening tests and a copy was provided as part of the response to the Regulation 61 Notice.

The specific BAT Conclusions on water emissions were also reviewed based on the Food, Drink and Milk BREF. No BAT-AELs apply because as per Table 1 in BAT 12 the BAT-AELs only apply in the case of a direct emission to a receiving water body, we do not consider a discharge to sewer a direct emission as it undergoes further treatment. The BAT-AELs do not apply either to the discharge of uncontaminated surface water drainage.

As per BAT 4 monitoring (apart from Chloride) only applies to a direct discharge of process effluent. The only possible monitoring requirement that may apply in the case of an indirect discharge is chloride monitoring. Upon reviewing the UK Regulators Interpretation Document we do not consider chloride monitoring required for this process. The monitoring requirements do not apply to the discharge of uncontaminated surface water drainage.

Therefore, there are no changes to the current emission limit values or monitoring requirements on either discharges.

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 from 4 December 2023

Release point	Parameter	Limit / BAT-AEL	Effective from
A9	Total volatile organic compounds (TVOC) ⁽¹⁾	50 mg/Nm ³ ⁽¹⁾	4 December 2023

(1)The TVOC emission limit value and monitoring does not apply when the TVOC emission load is below 500 g/h.

We have included the TVOC ELV and monitoring in the permit with a footnote as per footnote 2 of BAT29 in the BREF, the TVOC BAT-AEL does not apply with the TVOC emission load is below 500 g/h. We have also included a process monitoring requirement of total volatile organic compounds (TVOC) emission load on smoker A9. This is to establish on an ongoing yearly basis whether the BAT-AEL/ELV applies to the smoker. The Operator provided the result of one monitoring campaign acknowledging the emission load was below 500 g/h however we are unable to determine if this one result is sufficiently stable, thus have included an ongoing requirement in the permit to measure the emission load.

Emissions to Air – Article 15(4) Derogations

No derogations.

Other IED BREFs relevant to the permit review

There is a Section 5.4 activity listed within Table S1.1 of the permit relating to the Effluent Treatment Process of process effluent from the main activity. We consider this activity to be covered by the BAT conclusions with the Food, Drink and Milk BREF and therefore no additional assessment has been completed against the Waste Treatment BREF.

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		The operator is compliant with all aspects of BATc 1 excluding parts (ii), (iv), (xiv),(xix) and (xx) – Compliant by 01/12/2021 Please see the what steps the operator will take to address these deficiencies. (ii) The operator will Identify relevant interested parties, full compliance
	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	requirements and produce legal and compliance register for the EMS
	IV.	establishing objectives and performance indicators in relation to significant environmental aspects, including safeguarding compliance with applicable legal requirements;	(iv) See BAT 1(ii) upgrade requirement and link to KPI setting
	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;	(xiv) The operator will develop environmental assessment as part of infrastructure purchasing/planning procedures
	VI.	Determination of structures, roles and responsibilities in relation to environmental aspects and objectives and provision of the financial and human resources needed;	(xix) The operator will develop documented senior management review and ensure it is scheduled at least annually
	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);	(xx) The operator will develop a review and evaluation of techniques process formally within the EMS
	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

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 - Facility based KPI setting and tracking for energy & production yield. Production yield targets are set for all process lines and areas. These targets encourage maximum use of raw material for the various products, to ensure production lines are as efficient as possible and waste is kept to a minimum. Staff training is in place to ensure all relevant production staff are aware of the targets and requirements. Compliance with the targets is discussed at the daily management meetings. Areas that fall below the targets are investigated and monitored to ensure appropriate corrective action. There is a continuous process of
	I.(b)	descriptions of process-integrated techniques and waste water/waste gas treatment techniques to prevent or reduce emissions, including their performance	

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
				management evaluation of raw material input, yield maximisation and reduction of wastes, through data collation and management meetings, which in turn impacts water and energy usage.
II.		Information about water consumption and usage and identification of actions to reduce water consumption and waste water volume (BAT 7)		Compliant by 01/12/2021 - Further details to be added to allow mass balance information to be evaluated
Information on quantity and characteristics of the waste water streams, such as:				
III.(a)		Average values and variability of flow, pH and temperature		Currently Compliant The operator currently holds a consent from Welsh Water to discharge trade effluent to foul sewer. As part of this consent the operator is required to monitor the discharge volume, discharge rate, pH, COD and other parameters.
III.(b)		Average concentration and load values of relevant pollutants/parameters (e.g. TOC/COD, nitrogen species, phosphorus, chloride, conductivity) and their variability		
Information on characteristics of waste gas streams, such as:				
IV.(a)		Mean and variability of:		Improvement Condition – not enough detail
		Flow		
		temperature		
IV.(b)		Mean concentration, load and variability of relevant substances:		
		Dust		
		TVOC		

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
		CO	
		NOx	
		SOx	
	IV.(c)	<i>Presence of other substances that may affect the waste gas treatment system or plant safety:</i>	Improvement Condition – not enough detail
		O2	
		Water vapour	
		Dust	
	V.	Information about energy consumption and usage, the quantity of raw materials used, as well as the quantity and characteristics of residues generated, and identification of actions for continuous improvement of resource efficiency (BAT 6 and BAT 10)	Currently Compliant – See BAT 6 and BAT 10
	VI.	Identification and implementation of an appropriate monitoring strategy with the aim of increasing resource efficiency, taking into account energy, water and raw materials consumption. Monitoring can include direct measurements, calculations or recording with an appropriate frequency. The monitoring is broken down at the most appropriate level (e.g. at process or plant/installation level).	Currently Compliant – KPI tracking and evaluation undertaken routinely for energy and production yields. Annual permit reporting and Pollution Inventory reporting
MONITORING			

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
3	For relevant emissions to water as identified by the inventory of waste water streams (BAT 2): monitor key process parameters at key locations		
	Key process parameters		
	Waste water flow		Currently Compliant – emissions to water are monitored in line with a DCWW discharge consent and we consider that appropriate to fulfil this BAT conclusion
	pH		
	Temperature		
	Key monitoring locations		
	Pre-treatment inlet and/or outlet		Currently Compliant – emissions to water are monitored in line with a DCWW discharge consent and we consider that appropriate to fulfil this BAT conclusion
	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:		
	Refer to monitoring emissions to water table in BRef document		Compliant in the future – only chloride monitoring applies because the activity does not directly discharge to a receiving water body.
5	Refer to monitoring emissions to air table in BRef document Monitoring parameters depend on sector		Currently compliant - The only relevant parameter for meat processing is TVOC related to the smoker. The facility operates a smoking processes. Recent monitoring (see report EST-5912 Farmers Boy Deeside Ltd – smoker 1 report) of the smoker ('smoker 1')

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
		indicates that emission loads are well below the required levels that would make this BAT-AEL relevant (see table 3, BAT 29 below). We have added the monitoring requirement to the permit with a footnote stating only applicable when TVOC emission load is above 500 g/h. The Operator provided the result from just one monitoring campaign so we are unable to determine if the TVOC emission load is sufficiently stable therefore have added a process monitoring requirement to the permit.	
6	Energy Efficiency: BAT is to use 6a and appropriate combination of common techniques		
	a.	Energy Efficiency Plan	Currently Compliant - Whilst a specific energy management plan is not in place, Group ESOS audits and CCA compliance both impact on the energy management of the facility. An IT based KPI tracking system has recently been introduced which monitors live energy usage.
	b.	Use of common techniques	Currently Compliant - The operator stated an appropriate combination of these techniques are in place

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
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.	N/A – not applicable due to hygiene and food safety requirements
	c.	Currently Compliant
	d.	Currently Compliant
	e.	Currently Compliant
	f.	Currently Compliant
	g.	N/A
	h.	Currently Compliant
	i.	Currently Compliant
	j.	Currently Compliant
	k.	Currently Compliant
8	Harmful substances. BAT is to use one or a combination of the techniques given below:	
	a.	Currently Compliant
	b.	Currently Compliant
	c.	Currently Compliant
	d.	Currently Compliant

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
9	BAT is to use refrigerants without ozone depletion potential and with a low global warming potential	Improvement Condition – the refrigerants that are currently in use have a high global warming potential
10	Increase resource efficiency, use one or a combination of the techniques given below	
	a.	Anaerobic digestion
	b.	Use of residues
	c.	Separation of residues
	d.	Recovery and reuse of residues from pasteuriser
	e.	Phosphorus recovery as struvite
	f.	Use of waste water for land spreading
EMISSIONS TO WATER		
11	Prevent uncontrolled emissions to water, provide an appropriate buffer storage capacity for waste water	Currently Compliant - Balance tank (capacity, 95m3) in place. Applicability clause, combined with lack of space on site and that treated effluent discharge is to sewer not surface watercourse, indicates that further assessment not required
12	Reduce emissions to water, use an appropriate combination of the techniques given below	
	a.	Equalisation
	b.	Neutralisation
	c.	Physical separation
	d.	Aerobic and/or anaerobic treatment
		Currently compliant - Relevant compliance is as follows: a., b., c., j., m., in place Applicability of treatment technology is based on Discharge Consent compliance.

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.	Nitrification and/or denitrification		Emission levels in BAT12 Table 1 (BAT Conclusions) / Table 17.1 (in the BRef) are not applicable – they only apply for direct emissions to water only.
	f.	Partial nitrification		
	g.	Phosphorus recovery as struvite		
	h.	Precipitation		
	i.	Enhanced biological phosphorus removal		
	j.	Coagulation and flocculation		
	k.	Sedimentation		
	l.	Filtration		
	m.	Flotation		
	BAT-AELs for direct emissions to a receiving water body. Table 1 and associated notes. Associated monitoring given in BAT 4.			
	Chemical oxygen demand COD		25–100 mg/L	N/A – the activity does not directly discharge into a receiving water body, instead it discharges to foul sewer which is considered an indirect discharge.
	Total suspended solids TSS		4–50 mg/L	
	Total nitrogen		2–20 mg/L	
	Total phosphorus		0.2–2.0 mg/L	
NOISE				
13	Set up, implement, and regularly review a Noise Management Plan (as part of the EMS) where nuisance is expected and/or has been substantiated. Include ALL of the following:			

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
	I.	A protocol containing actions and timelines	N/A - Noise impacts at sensitive receptors is not expected nor has any ever been reported whilst operating under the Permit for 8+ years.
	II.	A protocol for conducting noise emissions monitoring	
	III.	A protocol for response to identified noise events, e.g. complaints	
	IV.	A noise reduction programme designed to identify the source(s), to measure/estimate noise and vibration exposure, to characterise the contributions of the sources and to implement prevention and/or reduction measures.	
14	Techniques to prevent, or where not practicable reduce noise and vibration emissions. Use one or a combination of the following:		
	a.	Appropriate location of equipment and buildings	N/A
	b.	Operational measures – see examples	Currently Compliant – i. Complied with (all relevant equipment subject to scheduled maintenance) ii. Complied with (food facility) iii. Complied with (staff training) iv. Complied with (operations consistent, cleaning shift only at night, no local receptors for night time noise) v. Complied with
	c.	Low-noise equipment – see examples	Currently Compliant - Controlled for health and safety purposes

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
	d.	Noise control equipment – see examples		Currently Compliant - i. to iv. Complied with as required/relevant
	e.	Noise abatement – see examples		N/A - Noise impacts at sensitive receptors is not expected nor has any ever been reported whilst operating under the Permit for 8+ years.
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:			
	I.	Protocol with actions and timelines		N/A - odour impacts at sensitive receptors is not expected nor has any ever been reported whilst operating under the Permit for 8+ years.
	II.	Odour monitoring protocol		
	III.	Odour complaint response plan/protocol		
	IV.	Odour prevention and reduction programme		
BAT CONCLUSIONS FOR MEAT PROCESSING				
Indicative	Indicative environmental performance levels for specific energy consumption Table 16 and footnotes			
	0.25 – 2.6 MWh/tonne of raw materials			Currently Compliant - Data from the facility indicates the following:

BATc number	Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
		Annual average (2014 to 2019) Delivered energy - 1.0 to 1.3 [redacted] MWh/tonne raw material (decreasing)]; Primary energy - 1.7 to 2.1 MWh/tonne raw material (decreasing). [redacted] Note: facility produces 100% cooked products
	Indicative environmental performance levels for specific waste water discharge Table 17 and footnotes	
	1.5 – 8.0 m ³ /tonne of raw materials	Currently Compliant - Data from the facility indicates the following: Annual average 2015 to 2019 Waste water: 3.5 to 4.5 m ³ /tonne of raw material
29	Reduce channelled emissions of organic compounds to air from meat smoking, use one or a combination of the techniques given below	
	a.	Adsorption
	b.	Thermal oxidation
	c.	Wet scrubber
	d.	Use of purified smoke
	BAT-AEL for channelled TVOC emissions to air from a smoke chamber Table 18 and footnotes, associated monitoring is given in BAT 5	
	TVOC	3 – 50 mg/Nm ³
		N/A – TVOC emission load is below 500 g/h.

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
		The flow rate has been reported in Permit Application as '<241 m³/hr' for this emission point. Emission is measured at 85.6 mg/m³. This provides an emission load of 20.63 g/hr, which is significantly below the 'applicability' requirement in BAT29. We consider as the BAT-AEL is not applicable, the monitoring requirement is also not applicable nor the requirement for abatement as mentioned in BAT29 as data collection for the BREF would have been based on smokers with a TVOC emission load above 500 g/h. Notwithstanding this we have added the BAT-AEL and monitoring requirement to Table S3.1 for the permitted smoker A9 in the case the TVOC emission load is ever above 500 g/h. To complement this we have also added monitoring of TVOC emission load as process monitoring to the permit so the Operator has an ongoing requirement to

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
		measure the TVOC emission load to determine if the ELV and monitoring applies within Table S3.1

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

Not Applicable