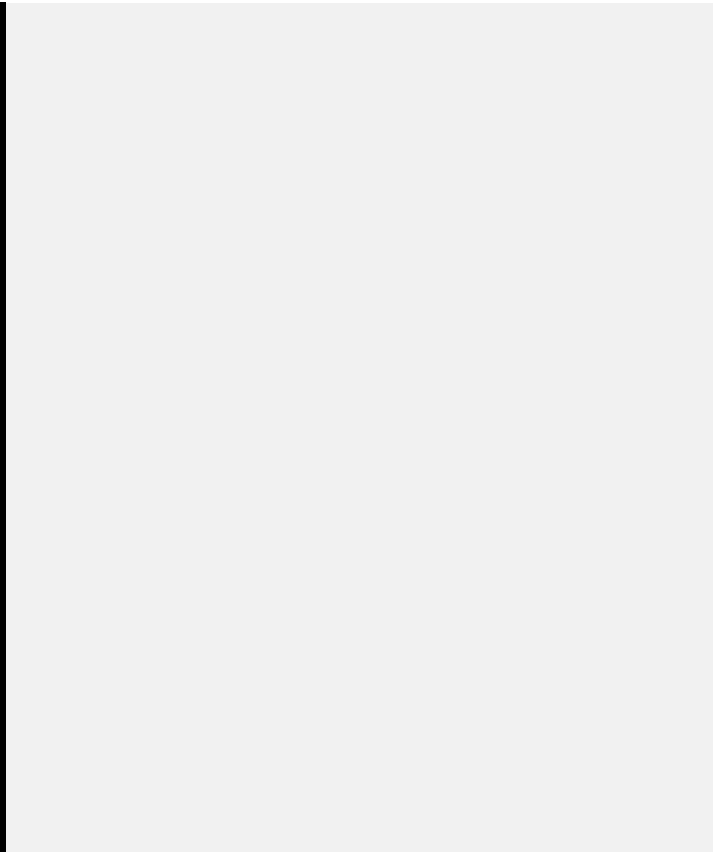


BAT

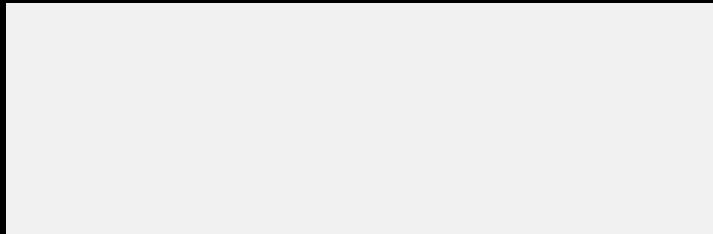
BAT 1. In order to improve the overall environmental performance, BAT is to elaborate and implement an environmental management system (EMS) that incorporates all of the following features:

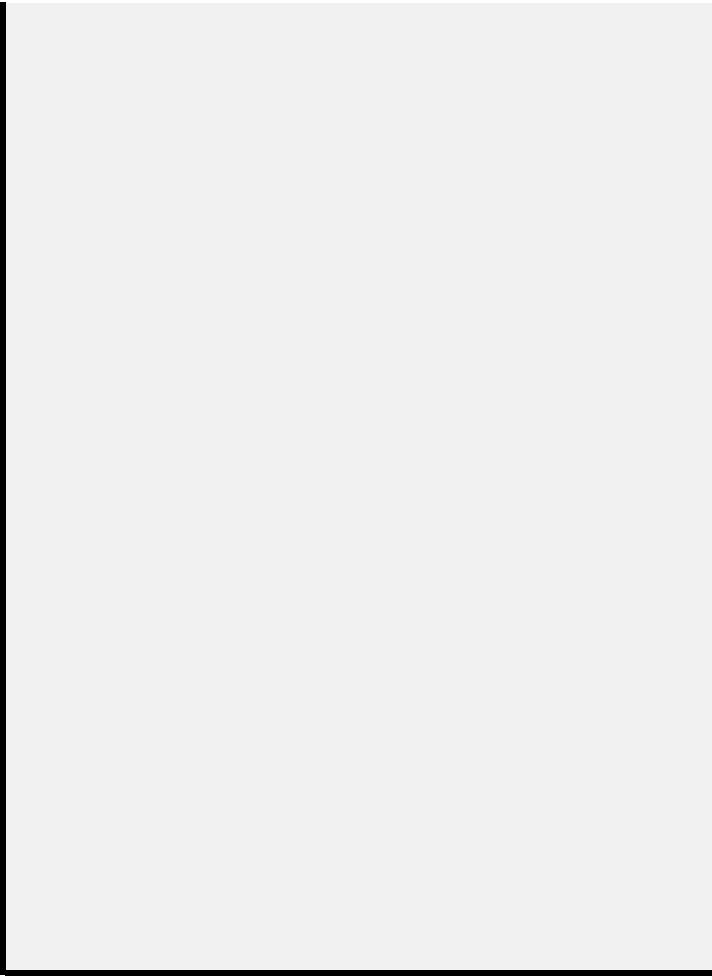


Specifically for the food, drink and milk sector, BAT is to also incorporate the following features in the EMS:



BAT 2. In order to increase resource efficiency and to reduce emissions, BAT is to establish, maintain and regularly review (including when a significant change occurs) an inventory of water, energy and raw materials consumption as well as of waste water and waste gas streams, as part of the environmental management system (see BAT 1), that incorporates all of the following features:





Subsection
(i) commitment, leadership, and accountability of the management, including senior management, for the implementation of an effective EMS;
(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;
(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;
(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 (see BAT 13);
(ii) odour management plan (see BAT 15);

Information about the food, drink and milk production processes, including: (a) simplified process flow sheets that show the origin of the emissions; (b) descriptions of process-integrated techniques and waste water/waste gas treatment techniques to prevent or reduce emissions, including their performance.
II. Information about water consumption and usage (e.g. flow diagrams and water mass balances), and identification of actions to reduce water consumption and waste water volume (see BAT 7).

III. Information about the quantity and characteristics of the waste water streams, such as: (a) average values and variability of flow, pH and temperature; (b) average concentration and load values of relevant pollutants/parameters (e.g. TOC or COD, nitrogen species, phosphorus, chloride, conductivity) and their variability.

IV. Information about the characteristics of the waste gas streams, such as: (a) average values and variability of flow and temperature; (b) average concentration and load values of relevant pollutants/parameters (e.g. dust, TVOC, CO, NOX, SOX) and their variability; (c) presence of other substances that may affect the waste gas treatment system or plant safety (e.g. oxygen, 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 (see for example 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).

Sites controls
14001 in place, certified by Alcumus (Certificate #1694-EMS-001). Section 5 of the EMS Manual talks about Leadership and the commitment.
The context is captured in section 4 of the EMS manual. Needs and expectations are captured in document <i>EMS 4.2</i> . The risks are captured in the aspects and impacts register. The EMS also includes a legal register.
Policy in place to meet the requirements of 14001. This is reviewed annually and signed by senior management.
Objectives are set annually. This include objectives looking to reducing and minimising any environmental impacts.
Procedures are in place. Our processes are outlined in section 8.1 of the EMS manual. Document #6.2.2 outlines how we achieve our environmental objectives.
Roles and responsibilities have been defined in section 5.3 of the EMS manual.
All staff receive EMS update training annually. Staff are also trained to Environmental procedures as required by role.
Section 7.4 of the EMS manual defines who we will communicate with and how.
Employees are able to submit change ideas and are encouraged to raise near misses if they have any environmental concerns.
An EMS manual and procedures are in place.
<p>We have multiple methods of operational control on site including,</p> <ul style="list-style-type: none"> Procedures, Planned maintenance activities. Daily/Weekly checks and readings Daily reviews Weekly senior management reviews of environmental performance Emergency preparedness plans
Maintenance programme in place. PM's recorded on Navision PM system. Maintenance includes inspections, calibrations and planned maintenance tasks.
We have an emergency preparedness plan in place. The plan includes mitigating the adverse (environmental) impacts of emergency situations.
Environmental impacts are considered as part of the change process. We will also look at this as part of the lifecycle perspective of any new installations.

Monitoring and measurement programme is in place. We have a monitoring and measurements register (EMS 9.1.1) which list any measurements that are taken on site.
Product loss is constantly monitored and compared against industry averages as part of yield targets and Continuous Improvement programme.
Annual internal audit programme is in place. We are externally audited annually by Alcumus.
Nonconformities are captured on a system called "My-Compliance" actions are put in place and tracked to completion. Root cause analysis will take place to identify the cause of the non-compliance.
Formal periodic review takes place with senior management. Any outcomes of the meeting are captured.
CI is at the heart of the EMS and we are constantly looking for ways to improve our environmental performance. This includes taking into account the development of cleaner techniques.
See BAT 13
See BAT 15

Our aspects register lists the emissions and the controls in place to reduce and mitigate. We will create a simplified process flow sheet to show the origin of the emissions.
We monitor water usage on a daily basis. The usage is reviewed before the 09:00 meeting and any high usage areas are flagged for investigation. We monitor our water usage as a ratio against production volume in litres. Our target for this year is to reduce water usage. We have site drawings to show where water is used (these drawings need to be updated).

With the exception of storm water all water is treated at the wastewater treatment plant. All water is discharged to a lagoon. Our consent also permits us to discharge to the river Box but we do not do this. Our discharge consent for the lagoon allows us to discharge a maximum of 350m³ per day. Our limits are as follows. ATU-BOD as O² 15 mg/l, TSS - 30 mg/l, Ammoniac al nitrogen 5 mg/l. We take 15 minute readings of the flow rate, TSS is monitored in really time and we will divert if the TSS goes above 30. The lab also take daily samples.

We use a 3rd party contractor (EmCo) to monitor the emissions from our boilers annually.

We monitor utility usage daily/weekly and have reduction targets of at least 5% against production.

Monitoring is in place. Usage is recorded in the energy metrics file and the daily water usage file.