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Purpose & Objectives

The objectives for this Odour Management Plan (OMP) are:

- Identify all possible odour sources at the facility.
- Outline the odour prevention control and mitigation measures employed on site.
- Ensure all operating conditions (normal, abnormal and emergency) are considered in evaluating the risk of odour release.
- Commit to pro-actively monitoring of odour emissions and in preventing impact on receptors, if deemed necessary.
- Reduce the risk of odour releasing incidents or accidents and planning for foreseeable potential events accordingly.
- Describe the contingency arrangements in place to prevent or react effectively to odour releases.

Management Plan Format

The structure of this management plan is as follows:

Receptor Identification -Discussion and detail of sensitive receptors, including those within 400 metres radius of the installation boundaries. Site Management will refer to the plan when reviewing odour source impact and when responding to complaints.

Source Materials and Odour Release Inventories –

- Lists odour sources identified at the installation.
- Potential impacts from the odour sources listed have then been assessed and a record of the assessment detailed within the MWG-R02-F1 Environmental Risk Assessment (ERA). The ERA provides an odour impact assessment for the farm by detailing:
 - The potential odour releases from site under normal operation;
 - The impact control measures employed to minimise the potential odours from identified release sources;
 - Abnormal scenarios leading to potential odour releases; and
 - Contingency plans in the event of the above abnormal scenarios occurring.

Overview of Odour Impact Controls – Table 3 details the key control measures and procedures in place to minimise the potential for odour generation from site.

Monitoring and Evaluation – This section of the management plan provides reference to any odour monitoring undertaken at site and complaint procedures in place in the event of an odour complaint being received.

Environmental Management System (EMS) references to all associated EMS documentation are provided throughout the OMP. The 'EM 00 System Index' should be consulted to cross reference to the latest Issue Number / Date for the most current version of the document in circulation.

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Audit and Review

Site Management will ensure the effectiveness of this OMP and associated procedures is reviewed as required by the Environmental Permit or when the following occurs:

- A series of sustained complaints that have been linked by Site Management or the Regulator to deficiencies in this OMP;
- Significant change to site infrastructure or operating techniques.

Reviews of the OMP and associated procedures will be recorded on the EM 03-006 Audit and Document Review Form. Where any improvements are required to 'on-site' odour control techniques, the Incident and Corrective Action reporting structure will be followed. Corrective actions will be recorded on the EM 03-001 Incident and Corrective Action Report From.

Guidance

Table 1 outlines the sector guidance documents, and their relevant BAT requirements, that have been considered during the preparation of this OMP. This Table will be updated as appropriate during every review to ensure the latest available Environment Agency guidance is considered.

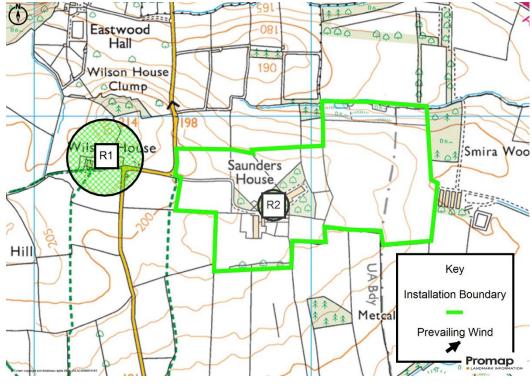
Table 1 – Guidance Documents				
Reference	Title	Document Issue Date / Version		
How to comply with your environmental permit for intensive farming	Appendix 4 - Odour management at intensive livestock installations	V1 - March 2011		

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Site Setting and Receptor Identification

Saunders House is an intensive free range hen farm, located at Norbeck Bank, Rokeby, Barningham. The installation comprises of three hen units and an extensive ranging area. The Permitted area is approximately 83 hectares. The National Grid Reference for the centre of the site is NZ 08821 11661.

As shown on the Receptor Plan below and detailed on the associated receptor schedule in Table 2, the nearest human occupied sensitive receptor that is not associated with the farm is Wilson House, c.260 metres to the West.



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Table 2: Summary of Sensitive Receptors Identified Within 400 metres				
Nature of Receptor	Direction	Approximate Distance from the Closest Installation Boundary	Plan Reference	
Residential / Industrial /	W	c. 260 metres	R1 – Wilson House	
Commercial / Offices	On Farm	On farm	R2 – Saunders House (Farm Property)	

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Source Material Inventory

The ERA referenced above that has been submitted in support of the Permit application identified the following odour sources on site –

- Odour emissions from livestock during transportation.
- Odour emissions from livestock in housing and ranging area.
- Odour emissions linked to diet of the livestock.
- Odour emissions from ventilation systems.
- Odour from hen litter.
- Odours from wash down and clean out.
- Odour emissions from carcase storage and disposal.

Pathways and Receptors

The pathway for all of the above sources is via the atmosphere. The prevailing wind direction is South Westerly. There are no downwind receptors within 400 metres of the proposed installation boundary. It should be noted that site have not received any complaints from neighbours relating to odour from the farm or associated operations.

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Overview of Odour Impact Controls

Table 3 below details the key control measures and procedures in place to minimise the potential for odour generation from site.

Table 3 – Overview of Odour Impact Controls			
Odour Source / Control Measure	Actions taken to minimise odour	Frequency of Implementation / Records	
Transport of Livestock	• Livestock vehicles are kept clean in line with Animal Welfare requirements.	On-going. Requirement of the livestock haulier to ensure vehicles are kept clean.	
All housing and management	 Livestock and housing are checked for cleanliness as part of daily welfare checks. Livestock and housing are cleaned out in accordance with written cleaning plan. No litter stored on site. Potentially odorous spillages such as feed ingredients and litter are cleaned up promptly. Stocking density maintained at or below levels set out in Welfare Regulations. Temperature and humidity in animal housing is monitored daily and controlled manually to optimise the housed environment for the livestock and air quality conditions. Ventilation corresponds to animals requirements; housing is insulated to help keep cool in the summer. Feed is ordered as required to prevent wastage. Feeders and drinkers have been designed to prevent wastage and leaks. 	On-going and records of livestock checks are documented as part of egg production assurance scheme.	
Effects of diet on odour and ammonia emissions (feed selection)	 Feed composition is closely matched to hens' requirements, especially protein. Diets are continually reviewed with a professional nutritionist to ensure good performance. 	On-going. Records of the diet used recorded as part of the egg production assurance scheme.	

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Table 3 – Overview of 0 Odour Source /	Actions taken to minimise odour	Frequency of Implementation / Records
Control Measure	There's taken to minimise odda	Trequency of implementation, necords
	Records of crude protein levels and diet formulation are kept in the site office.	
Cleanliness of yard areas	 Yard surfaces are properly maintained. Litter from all housing is loaded directly to trailers for transport to off-site when houses are cleaned out. Yards and open surfaces are designed to ensure effective separation of uncontaminated rainwater from litter. 	On-going as part of the inspection and maintenance programme.
Feed delivery and storage	· · · · · · · · · · · · · · · · · · ·	On-going. Integrity of feed silos and distribution systems checked as part of site infrastructure inspections.
Ventilation	 Ventilation corresponds to animals' needs and is checked to be functioning correctly. Air outlets positioned to optimise dispersion to atmosphere. Buildings insulated and insulation kept in good order. 	On-going. Performance of ventilation checked by Stockmen on daily basis.
Cleaning out	 Litter removed from sheds via belt system on a weekly basis. No litter stored on site. Full cleaning out occurs as soon as possible after destock. Full cleaning out is primarily of internal units, with wash waters captured in dedicated storage tanks, prior to removal off site in enclosed tankers. 	On-going. Records of clean out and wash waters documented.

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Table 3 – Overview of Odour Impact Controls				
Odour Source / Control Measure	Actions taken to minimise odour	Frequency of Implementation / Records		
Animal carcases	 Fallen stock are kept in covered storage and disposed of promptly on-site by incinerator. Storage container is sealed preventing leaks. Incinerator is licensed and well maintained. Incinerator odours controlled by after-burner. 	On-going. Incinerator approved by APHA.		
Dealing with odour complaints	 Any odour complaints will be reported to the Site Manager. The Site Manager will log and investigate causes of all odour complaints. The Site Manager will identify the source of the odour issue and will monitor odour levels at the site boundary as part of the investigation, should the source be related to site operations. The complaint details and subsequent investigation will be recorded on the site compliant form and a copy will be kept in the site office. 	On-going. Complaints will be logged following the Communication and Complaints Procedure.		
General comments	 Neighbours will be informed (where necessary) prior to activities which may cause odour. Odour levels will be monitored on site by all staff. The source of abnormal odours will be identified and appropriate action will be taken to reduce odour levels back to normal levels. The effectiveness of odour control measures will be reviewed at least once a year or sooner in the event of any complaint or relevant changes to operations. 	On-going. Review of effectiveness of odour controls will be documented.		
Staff Training	 All members of operational staff are aware of this Odour Management Plan, and their responsibilities for controlling operations on site. Clear lines of responsibility have been established on site between operational staff and the management team, ensuring any actions required to mitigate against odour nuisance are taken and recorded appropriately. 	On-going. Records of daily checks maintained as part of egg production assurance scheme.		

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Table 3 – Overview of Odour Impact Controls				
Odour Source /	Actions taken to minimise odour	Frequency of Implementation / Records		
Control Measure				
	Site conditions are monitored at all times by staff during routine			
	tasks, any concerns regarding odour are reported to the			
	management team.			

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Monitoring / Corrective Action and Response

Monitoring - The ERA has set out that the potential for odour emissions from site to impact on identified receptors is insignificant. Therefore, routine odour monitoring is not considered necessary.

Incident and Corrective Action - Any faults or deficiencies encountered on-site with regards to infrastructure and where procedures could not be carried out are detailed using an incident and corrective action reporting structure and recorded on EM 03-001 Incident and Corrective Action Report From. This will instigate appropriate level of management commitment to ensure corrective action is undertaken. A review of the corrective action will be included to ensure satisfactory completion and senior management sign-off.

Complaints – All environmental complaints are dealt with by the EM 02-005 Communication & Complaints Procedure. The procedure deals with how to manage complaints and ensures that all relevant communications can be dealt with appropriately. The procedure outlines the requirements to communicate effectively with Regulators and any other interested parties and also internal staff.

Interpretation of Monitoring Results and Complaint Records – Site Management will review all Incident and Corrective Action and Complaint Records to ensure good evidence is provided that corrective actions have been implemented to ensure control measures are in place and are working as intended. These reviews will be recorded on the EM 03-006 Audit and Document Review Form.

Community Engagement – A member of Site Management will always be available to liaise with Regulators / general public during shutdowns and other abnormal situations.