**Appendix 3**

**Summary of Environmental Management System**

**The Environmental Management System (EMS) in place includes the following:**

1. Implementing Environment Agency’s Environmental Permit Regulations (EPR) ‘How to Comply’ document (version 2)
2. Farm assurance scheme(s)
3. Evidence that single Farm Payment Scheme cross compliance requirements are complied with
4. Stock movement and numbers on site are recorded as per statutory requirements (Nitrate Vulnerable Zones (NVZs), The Pigs (Records, Identification and Movement) Order 2011 (PRIMO) and eAML2)
5. Other records and operations as per statutory requirements (e.g. relating to waste regulations, water resources act, health and safety, COSHH, duty of care)
6. Manure management complies with nitrates regulations requirements
7. Storage complies with the Silage, Slurry and Agricultural Fuel Oil regulations (SAFFO) where applicable
8. Manure Management Plan and export records
9. Environmental Risk Assessment
10. Staff are trained and are aware of their, and any contractors’ responsibilities.
11. Evidence of training, operating, inspection and maintenance in compliance with the manufacturer’s instructions
12. Records of complaints, incidents and reporting
13. Pollution Prevention and Management Plan

In addition to the above, the EMS includes:

**Normal operations**

* Daily records are kept on all aspects of the farm’s operation including:
  + Pig movements
  + Feed consumption and deliveries
  + Delivery of goods and materials
  + Medication
  + Mortalities
* Records of water and fuel consumption are kept
* Staff carry out daily inspections of the site to ensure all plant is operating correctly
* The farm manager reviews information and operation frequently with staff, to identify any unexpected or abnormal changes in operation and agree suitable remedial action if necessary.

**Maintenance schedule and records**

A programme of planned preventative maintenance is carried out on all plant equipment including:

* Feed and water systems and sensors
* Inspections and maintenance schedules are based on the manufacturer recommendations
* Buildings, bunds and equipment on site are inspected weekly and checked for visual signs of leakage, corrosion and structural damage, security and correct operation
* A record of all faults, maintenance work and inspections is kept in the farm office. Details can be found in the inspection and maintenance schedule on page 8 of this document.

**Incidents and abnormal operations**

Measures are in place to identify incidents and abnormal operations such as breakdowns, damage, etc. Staff are trained to notice and respond to abnormal changes in operation by investigating the causes. They then either take steps to get back to normal operation and ensure the problem does not reoccur or report issues that cannot be immediately addressed.

A copy of the permit is available and accessible for staff to read. Staff have been given training on the potential environmental impacts of the unit and their role in ensuring environmental impacts are minimised.

**Complaints system**

Complaints relating to the farm’s activity are logged and referred to the operator for investigation and follow up action (a copy of the form to be used can be found on page 11 of this document). A record is kept of any remedial action to prevent or minimise the causes and staff will also respond to concerns raised by the local community as appropriate.

On receipt of the environmental permit we will place a site identification notice at the entrance of the site clearly visible from a public highway in accordance with ‘*How to comply with your environmental permit for intensive farming Version 2 2010*’. The sign will notify neighbours and members of the public about the nature of the farm and who they can contact for further information or to notify a concern.

There are a number of sensitive receptors within 400m distance from the installation boundary, and three within 100m. Please refer to the odour, noise and bioaerosol management plans (appendices 8, 9 and 10).

There is no history of odour, noise or bioaerosol complaints. Measures that help minimise impact off-site are summarised in the Environmental Risk Assessment attached. Management plans will be reviewed at least once per year, in the light of any building and management changes or on the outcome of investigations into the cause of any future complaints if any occur.

**Accidents**

The site has an Accident Management Plan which will be implemented if an accident occurs. Events or failures that could damage the environment have been identified in the Environmental Risk Assessment (Appendix 5). All staff are aware of the location(s) and content of the Emergency Action Plan and their responsibilities in the event of an accident.

**Training and qualifications**

* All staff (where applicable) are suitably qualified to work at the installation
* All staff receive formal training from both the farm manager and external training providers, which includes making them aware of their (and contractors’) roles and responsibilities
* All staff have received formal training on Health and Safety, the Emergency Action Plan, and will be trained about the requirements of the environmental permit and pollution prevention
* New staff are mentored as part of their ‘on the job’ training
* Staff and contractors have defined roles and understand what is required of them and what others will carry out
* Training, refresher training, qualifications and instruction of staff and contractors is recorded in the training plan; the training plan is kept in the site office
* We aim to have enough staff and resources to make sure the site is run effectively in order to comply with our permit
* We will define who is responsible for what procedures and who is technically competent. Specifically we make a list of any roles carried out by staff, managers or contractors that relate to activities and conditions covered by our permit. We will review this list on a regular basis and update as and when changes to staffing, roles or activities occur.

**Site security**

* Stores and equipment are securely locked at night
* The site gates are locked at night to prevent pedestrian and vehicle access out of hours
* Signs are placed around the perimeter to warn unauthorised people against entering the site
* There is a public footpath through the site. Precautions for security and biosecurity are taken

**Energy efficiency**

Energy usage at Red House Farm is as follows:

|  |  |
| --- | --- |
| Energy source | Use |
| Electricity | Lighting, pressure washer, computer control systems for feed delivery, feed augers, water pumps, changing/medicine room lighting and fridge |
| Diesel | Vehicle (muck tractor) |

**Basic energy requirements**

**Heating: where applicable**

* No heating.

**Electricity**

* Low energy light bulbs are used in the office and changing area.
* Low energy fluorescent lights are used in the sheds. Moving to LED as replacements are required.

**Fuel oil**

* There is one diesel tank within installation boundary, but which is related primarily to the arable enterprise.
* Vehicles and tractors are serviced by a contractor at recommended service intervals
* All staff and contractors employed on site are trained in the efficient use of equipment, including driving techniques. Training needs are reviewed annually and as new equipment or techniques are introduced
* Energy usage is recorded. In accordance with the permit, energy efficiency and usage will be reviewed every four years. Opportunities to improve energy efficiency will be implemented if suitable.

**Further potential improvement measures include:**

* Installing more energy efficient equipment and controllers, as appropriate.

**Efficient use of raw materials**

* Types and amounts of raw materials used on farm are listed in the Raw Materials Inventory
* Product safety sheets should be attached to this form
* The raw materials inventory will be reviewed every four years to identify opportunities for reducing usage or substituting materials that are less harmful.

**Minimising water use**

* Water is from borehole (with Mains supply available as backup) and is supplied in nipple drinkers. The borehole is located outside of the installation boundary and is housed.
* Water is measured by water meter, with readings taken routinely, and signs of leakage or wastage are closely monitored for on a daily basis – checking the drinkers in each pen for signs of leaks or unexpected drops in water pressure; any significant fluctuations will be investigated by the farm manager and remedial action taken
* A water efficiency audit will take place within two years of the permit issue. An action plan to reduce water use will be agreed as a result. Water use will then be reviewed every four years.

**Avoidance, recovery and disposal of wastes**

Within two years of the permit being granted, a waste minimisation review will be undertaken to take into account the waste hierarchy and to identify whether appropriate measures to ensure that minimal waste is produced need to be updated and changed.

The methodology for this review and an action plan for reducing the use of raw materials will be submitted within two months of completion of the review. For wastes which are technically and financially impossible to recover, such as sharps, vaccines, veterinary materials, including gloves and ABP, these are collected by a suitably licensed contractor for disposal.

**Environmental Policy Statement**

Red House Farm is committed to protecting the environment by implementing policies that achieve a sustainable, thriving business, while minimising any negative impact of its activities, and seeking, where possible, to maximise the potential yield of products produced and effective use of co-products and materials such as organic manures.

The key points of the policy will be implemented through the Environmental Management System, adhering to at least the minimum standards of the environmental permit and other relevant legislation as follows, by:

* Respecting the welfare of livestock, staff, visitors, neighbours and sensitive habitats
* Using resources efficiently to minimise waste and emissions
* Actively promoting reduction, recovery and recycling of resources used, both internally and among its customers and suppliers
* Seeking to achieve market specification for products produced, to minimise the environmental impact through high rates of product usage by customers, production and distribution
* Meeting or exceeding all the environmental legislation that relates to the business
* Participating in schemes that promote efficiency
* Identifying and implementing new or appropriate technologies that improve overall efficiency
* Striving for continual improvement

**Climate change adaptation planning**

[Climate projections for the UK](https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/index) suggest that we can expect:

* higher average temperatures – particularly in summer and winter
* more heat waves and hot days
* rising sea levels
* changes in rainfall patterns and intensity
* more storms

We will review at least every 4 years, or more frequently as appropriate, the adaptations the site and management may require going forwards to mitigate the risks posed by a changing climate. We will continue to ensure that we are able to comply with the conditions of our permit.

We are working with our pig and feed suppliers to mitigate GHG emissions within the supply chain and to plan for net zero. In assessing the risks to the installation, we include the associated risks to local communities and the wider environment. We understand that these impacts and risks may change over the lifetime of the activity and therefore will review our plans, adaptations and risk assessments at least every 4 years or in response to new information and learning.

Rather than having a completely separate plan, we have built in climate change resilience and contingency planning into our Emergency Action Plan. Including looking at multiple factors occurring at the same time – for example, supply chain failure and extreme weather. Informing our current contingency plans, and the mitigations and adaptations that need to be considered for the future, is a Climate Change risk assessment (Appendix 3a) which will be regularly updated/reviewed.

Plans are aimed to ensure our operations remain resilient at stages along a [climate projection](https://www.theccc.org.uk/publication/independent-assessment-of-uk-climate-risk/) of at least a 2°C global mean temperature rise by 2050. Also, assess what further requirements may be necessary along a projected 4°C rise by 2100 – up to the projected lifetime of the permitted activity.

To anticipate and prevent risks to local communities and to the environment, we plan to test the effectiveness of our:

* actions
* policies
* procedures
* assessments

We use the [adapting to climate change: industry sector examples for your risk assessment](https://www.gov.uk/government/publications/adapting-to-climate-change-industry-sector-examples-for-your-risk-assessment) when developing or reviewing our management system.

Please refer to Appendix 3a for the current risk assessment, with suggested mitigation measures to plan for.

**Inspection and maintenance schedule**

Records are kept of inspection and maintenance of farm structures and plant. Staff report any problems encountered and actions taken on a daily basis directly to the pig unit manager. A record is made in a log book kept in the Office. This is reviewed daily by the person with overall responsibility for the site for that day and appropriate action implemented.

Structures and equipment are inspected weekly/monthly. The inspection and maintenance programme covers the following areas:

* Building structures and yards; includes structural integrity, water system, electrical systems, roofs, drainage systems, gutters and downpipes
* Dirty water/effluent collection, floating cover, and drainage routes
* FYM storage area and equipment
* Slurry above ground store and fixed cover
* Medicines/disinfectant store
* Fuel tank
* Incinerator
* Generator
* Feed storage bins; includes collision protection integrity as applicable
* Feed and water delivery pipework/systems
* Clean water drainage routes, including soakaway
* Vehicles and pressure washer
* Ventilation system, including fail-safes and alarms

**Site closure/decommissioning plan**

# Purpose

This plan indicates how buildings, infrastructure and any remaining manures and wastes will be dealt with when a site is closed or decommissioned.

The plan also includes a record of any pollution incidents, such as spillage of oil, leaking stores, etc. which have occurred during the operation of the permitted site, together with the steps taken to remedy that pollution at the time. This will help to establish whether the site is in a satisfactory state when the permitted Schedule 1 Activity (pig production) ceases and the EPR/IPPC Permit is surrendered.

## Methodology

Buildings, stores and facilities which are to remain in place will be cleaned thoroughly internally and externally to avoid any potential risk of pollution. If these buildings, stores or facilities are to continue in use for activities for which the Permit is no longer required, a suitable programme of works and timescale for completion will be agreed in writing with the Environment Agency to achieve the best environmental outcome and to minimise waste.

Wastes, including unused chemicals, asbestos and oils, will be disposed of following the Duty of Care. Manure, slurry and dirty water stores will be emptied as appropriate with the contents applied to land for agricultural benefit.

Where possible, unused livestock feeds will be collected and fed to suitable livestock elsewhere. Spoilt and surplus feedstuffs, and feedstuffs that cannot be recovered by feeding to stock, will be mixed with slurry or manure as appropriate and used in accordance with the methods already stated.

Infrastructure dedicated to the livestock named in the permit will be removed or taken out of use if no immediate further use is required for it on that site. Buildings will be cleaned and secured if their use is no longer required. This plan will be maintained on site, updated as circumstances change and will be reviewed every four years. Please refer to the Site Layout, Site Drainage and Site Services plans and Site Condition Report for further details.

##### **Annual inspection and maintenance schedule** Year:\_\_\_\_\_\_\_\_\_\_\_

| **Facility** | **Reference on site Layout Plan** | **Remedial work required and date noted** | **Date remedial work completed** | **Signature** |
| --- | --- | --- | --- | --- |
| Changing area/medicine store |  |  |  |  |
| Pig Building | 1 |  |  |  |
| Pig Building | 2 |  |  |  |
| Pig Building | 3 |  |  |  |
| Pig Building | 4 |  |  |  |
| Pig Building | 5 |  |  |  |
| Incinerator and deadstock bin |  |  |  |  |
| Fuel tank and bund |  |  |  |  |
| FYM Midden |  |  |  |  |
| Dirty water lagoons, floating covers, pipework/connection points |  |  |  |  |
| Slurry store, fixed cover, pipework/connection points |  |  |  |  |
| Tankers, pumps, equipment |  |  |  |  |
| Clean water drains, soakaway, roof guttering and drainage covers |  |  |  |  |
| Feed bins, including collision protection |  |  |  |  |
| Feed lines, augers and hoppers |  |  |  |  |
| Water system (pipework, drinkers) |  |  |  |  |
| Ventilation system including fail-safes and alarms |  |  |  |  |
| Yard areas |  |  |  |  |
| Loading ramp |  |  |  |  |
| Electrics and plumbing |  |  |  |  |
| Vehicles and pressure washer |  |  |  |  |

Operator signature: …………………………………………………… Date: ……………………………

**Intensive Farming General Complaint Form**

|  |  |  |
| --- | --- | --- |
| **Name of farm** | | |
|  | | |
| **Time and date of complaint** | **Name and address of complainant** | |
|  |  | |
| **How complaint was received, eg telephone call, visit, etc?** | **Email address of complainant** | |
|  |  | |
| **Who first received the complaint?** | **Telephone number of complainant** | |
|  |  | |
| **Who was the complaint reported to for further action?** | | |
|  | | |
| **Type of complaint** (*give all relevant details – use space overleaf if necessary*) | | |
|  | | |
| **Describe the activity which was happening at the time of the complaint (*include names of any relevant staff*)** | | |
|  | | |
| **Any other relevant information** | | |
|  | | |
| **Are there any other complaints relating to the installation or that location? (If yes, give details)** | | |
|  | | |
| **Actions taken and by who** | | |
|  | | |
| **Form completed by** | **Signed** | **Date** |
|  |  |  |

**Intensive Farming General Complaint Form**

Type of complaint continued…

# Pollution Incident Record

**Permit Number**:…………………………………..

*Attach relevant documents or provide details using the Pollution Incident Record form provided below.*

|  |  |  |  |
| --- | --- | --- | --- |
| **Date of incident** | Description of the incident *Include any EA case number and name(s) of EA officers in attendance, if applicable* | Action taken | **Signature** |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |