HBP-OD-09 Pest Management Plan

Herriard Bio Power Ltd.

Bushywarren Lane, Herriard, Basingstoke, RG25 2NS

Produced in conjunction with Earthcare Technical Ltd.

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1 Introduction

1.1 Overview

This document comprising a Pest Management Plan (PMP), is written for Herriard Bio Power Limited who operate an anaerobic digestion (AD) facility at Bushywarren Lane, Herriard, Basingstoke, RG25 2NS. The Environmental Permit reference number is EPR/AB3807KW.

1.2 Purpose

This PMP is part of the overall environmental management system for the AD Plant.

A Pest Risk Assessment (Appendix A) has been carried out which assesses the risk of different types of pests arising at the AD operation. Pests could occur onsite if not managed and controlled correctly, due to the presence of waste feedstock, which could be a feed source for them.

This PMP has been developed based on the Pest Risk Assessment to describe existing pest control measures and to explain additional appropriate pest control measures which will be enacted in any of the following instances:

1. The detection of pests at a level likely to cause annoyance or nuisance to receptors in the locality.
2. A specific substantiated complaint.
3. A request by the Environment Agency (EA).

It is recognised that in the circumstances above, although pests may not be completely eliminated, their numbers can be minimised and impact mitigated by implementing a structured PMP.

1.3 Development of the PMP

The PMP has been developed to formalise the procedures that are followed to minimise and control pests at the regulated facility.

This PMP is a live document that will be reviewed and amended as necessary throughout the life of the operational site.

1.4 Permitting

The current permit EPR/AB3807KW includes the following permit conditions:

3.6.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.

3.6.2 The operator shall:

(a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution, hazard or annoyance from pests;

(b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

However, in line with current EA guidance, and the revised Environmental Risk Assessment, a PMP has been developed and forms part of the current substantial permit variation to change the current bespoke waste operation permit to a bespoke installation permit. The substantial permit variation includes a proposed increase to the maximum permitted annual tonnage of waste from 36,500 to 40,000 tonnes.

The digestate storage has been redesigned to be held within two covered lagoons rather than one open lagoon which may attract birds as an open 'water' landing site.

The proposed increase in waste feedstock quantity is not deemed to increase the risk of pests on site as the proposed changes incorporating liquid wastes in tanks and undamaged, packaged, palletised and wrapped food waste stored within the Waste Reception Building will not provide accessible food sources to pests.

1.5 Site Infrastructure

The relevant site infrastructure includes a Waste Reception Building comprising:

- Mavitec depackaging line – paddle de-pack with hopper (4m^3 capacity) with screen (12mm)
- Quarantine bay
- Sealed drainage sump
- 2.5m high concrete walls inside the building structure
- Roller shutter doors

There are planned improvements ongoing to:

- Move the container for residual packaging waste to inside the waste reception building.
- Replace the roller shutter doors with fast acting roller shutter doors.
- Improve internal surfacing and drainage within the building.
- Add a liquid waste dispatch point inside the building.
- Replace the current UV odour abatement system with a woodchip biofilter abatement system.

The maximum tonnage of loose or packaged food waste to be stored within the Waste Reception Building is 315 tonnes at any one time and the maximum storage period is 72 hours.

1.6 Structure of the PMP

The PMP is structured to cover existing pest management controls at the site and to outline further appropriate control measures in the instance of a pest issue arising from the operations.

The following areas are covered in following sections:

- Staff training and competence
- Pest prevention
- Pest monitoring & control
- Review of PMP
- Complaints procedure

2 Pest Control Techniques

2.1 Staff Training & Competence

Herriard Bio Power Limited will ensure that a technically competent manager (TCM) attends site for the requisite hours in accordance with the Environment Agency guidance 'Legal operator and competence requirements: environmental permits'.[1]

As part of their roles and responsibilities, the TCM is required to understand the potential impacts from the regulated facility including amenity impacts such as pests, how these impacts should be monitored and controlled, the management of complaints and the keeping of records.

Herriard Bio Power will ensure that staff are trained to understand the PMP and:

- The types of possible pests
- Pest sources
- Problems caused by pests
- Appropriate control measures

2.2 Pest Prevention

Pests are more likely to be a problem if there is a food source for them and during certain seasonal changes.

The types of pests that could become an issue are listed, but not limited to:

- Scavengers including rats
- Gulls
- Corvids
- Flies

[1] https://www.gov.uk/guidance/legal-operator-and-competence-requirements-environmental-permits Accessed 6 December 2023

2.2.1 Sources of Pests

Pests could be present at the site due to the presence of feed material i.e., food wastes and silage within the silage clamps. Rats and mice could live in and amongst the feedstocks. There is potential for scavengers feeding within the Waste Reception Building and feeding /nesting within the silage clamp area.

The roofs of the tanks and Waste Reception Building are a potential roosting spot for any birds including gulls and corvids.

Once the feedstock is fed into the Raw Waste Buffer Tank it enters a closed system where the organic matter is digested and whole digestate is stored in a sealed tank until it is dispatched off-site.

2.2.2 Control Measures

As detailed in the Pest Risk Assessment (Appendix A) the presence of pests is controlled through existing management techniques on site, namely:

- Short storage periods and restricted tonnages for feedstocks on site, as shown in Table 1 below.
- Good housekeeping around the site and silage clamp area including Daily Checks **(HBP-MP-01).**
- Maintenance and closure of the Waste Reception Building roller shutter and pedestrian doors. Movements will be carried out using existing standard operating procedures to ensure that the roller shutter doors are only opened whilst vehicles are entering and leaving the building.

Table 1 – Solid feedstocks, storage arrangements, tonnages, and residence times

Type of feedstock	Storage location	Maximum tonnage at any one time (tonnes)	Maximum residence time
Energy crops	Silage clamps	12,500	1 year
Loose or packaged food waste	Waste Reception Building bay	315	72 hours
Packaging waste	1. No. Storage container	30	1 week
Maximum total solid feedstock storage capacity		12,815	

2.3 Pest Monitoring & Control

Monitoring and control of pests at the Site includes:

- Daily Checks **(HBP-MP-01)** carried out by site staff as part of the broader site monitoring process.
- Weekly site visits and monitoring of pest activities through a licensed pest control specialist contractor.

If a pest infestation is observed, then:

- Action will be taken to eliminate the infestation as directed by the specialist pest contractor.
- Inspection notes will be recorded by the contractor and maintained in a site pest control file; and
- Any incident will be recorded in the Site Diary **(HBP-MP-04).**

3 Additional Pest Control Techniques

3.1 Overview

It is proposed to undertake additional pest management controls in response to any of the following:

- The detection of pests at a level likely to cause annoyance or nuisance to receptors in the locality
- A specific substantiated complaint
- A request by the Environment Agency

These additional controls are detailed in the subsequent sections of the PMP.

3.2 Pest Monitoring

Pests are to be monitored by all site personnel and pest control contractors and brought to the attention of a TCM if they are present to ensure action is taken. These details will be recorded in the site diary and inspection reports within pest control records.

Further monitoring must be undertaken until the occurrence of the pests at site has stopped.

3.3 Pest Control Techniques

To control pests onsite the following additional control technique will be considered as advised by a licensed and trained pest control contractor to appropriately bait and deter any pests from site.

4 Review of Pest Management Plan

The PMP will be reviewed and updated as necessary and as a minimum in the following circumstances:

- When there are changes to the site, operations or equipment that affect the activities covered by the PMP; and
- If a pest issue arises and new control measures have been implemented to control it.

A record will be kept of any changes made to the PMP.

5 Complaints

It is important to Herriard Bio Power Limited that the AD plant does not have an adverse effect on the local community and those living nearby.

All complaints will be fully investigated in accordance with the Complaints Procedure **(HBP-SOP-15)**. Action will be taken to rectify the situation as necessary and to let the complainant know what this action has been. This will all be recorded on the Complaints Record Form **(HBP-FT-04)**.

Appendix A – Site Specific Pest Risk Assessment

Data and information				Judgement				Action	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management?**
Local human population	Rats/Mice	Harm to human health, loss of amenity	Over land	Medium	Medium	Medium	Rats/Mice can multiply through breeding quickly. Rats/Mice may seek to nest and feed within the silage clamps. Once crop and waste feedstocks enter the AD plant they are within a closed system where there is no access for rats or mice.	In accordance with management systems: • Ensure silage clamps are covered appropriately. • Carry out daily inspections of the silage clamp area and act to eliminate pests if found. • Minimise amount of waste within the waste reception building at any one time and storage times (see Table 1 of PMP). Employ first in first out system. • Appropriate baiting around site to reduce rat and mice numbers to a minimum. • Good housekeeping on site. • Monitoring for pests and appropriate actions as detailed in PMP.	Low

Local human population	Gulls/Corvids/Waterbirds	Harm to human health, nuisance, loss of amenity	Air transport and over land	Low	Medium	Low	The site is in proximity to reedbeds and surface water. Waterbirds previously attracted to the open digestate lagoon, which benefitted from bird nets will not have access due to the two lagoons benefitting from a cover. Silage clamps are covered and only open at the face. Regular vehicle movements and daily use of silage should discourage nesting birds. Waste feedstocks are enclosed within the waste reception building and then fed into an enclosed AD system. Depending on the type of bird, occurrence can be seasonal due to migration patterns and other local events attracting them to site.	In accordance with management systems: • Daily checks on those areas of the site which may attract birds. • Use any appropriate bird deterring systems if required and implement along with advice from the contracted pest controller.	Low

Data and information				Judgement				Action	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management?**
Local human population	Flies	Harm to human health, nuisance, loss of amenity	Air transport and over land	Medium	Medium	Medium	Insect pests could multiply particularly in summer months from the heat and sun. Once feedstocks have entered the AD plant they are in a closed system where there is no fly potential.	In accordance with management systems: • Monitoring for pests and appropriate actions as detailed in PMP.	Low