

Non-Technical Summary

Pilgrim's Pride Ltd Redruth, part of the Pilgrim's Group, produces cured, smoked and sliced pork products. Finished goods are transported from site and distributed by a third-party logistics company.

The site has historically received joints of meat (pork) from sister operations in either Denmark or other UK curing facilities. The slicing plant takes joints (predominantly cured pork backs and bellies) which are blast frozen, prior to being pressed to achieve a uniform shape, then sliced on high speed lines, straight into retail pack.

The site has in recent years invested in a purpose built self-contained functional curing and smoking production facility to supply the adjacent slicing plant and is currently investing to further expand its on-site curing capabilities. The operator acknowledges that curing induces a change in the raw materials that cannot be reversed so is viewed as treatment and processing under the regulations. The most recent investment in the plant will take the maximum production capacity over the 75t per day threshold.

Whilst the enlarged curing facility provides supply raw materials to the adjacent slicing plant it can and will provide products for despatch directly to other sites and customers in line with the prevailing business model. However, the curing facility shares utilities, materials storage and effluent treatment with the slicing plant. From a business model perspective curing does not necessarily depend on the slicing facility and vice versa.

The site is served by a Dissolved Air Filtration (DAF) plant that releases treated effluent to foul sewer under a trade effluent discharge from South West Water with a daily consent limit of 240m³.

Pilgrim's Pride considers the production of curing of meat products at the site is obligated under the Environmental Permitting (England and Wales) Regulations (EPR) 2016, as amended, in relation to the following activities:

Section 6.8 A(1) (d)(i)

treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed (where the weight of the finished product excludes packaging)-

(i) only animal raw materials (other than milk only) with a finished product production capacity greater than 75 tonnes per day.

There are a number of directly associated activities on the site which support the obligated activity, including:

- Storage of raw materials;
- Steam raising and hot water boilers;
- Three cooling towers;
- Storage of waste prior to disposal off-site;
- Treatment of effluent prior to discharge.

The effluent treatment is considered a permissible activity under the following schedule reference:

Section 5.4 A (1) (a) (ii)

Disposal, recovery or a mix of disposal and recovery of non-hazardous waste....

(a) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day if the only waste treatment is anaerobic digestion) involving one or more of the following activities and excluding activities covered by Council directive 91/271/EEC concerning urban waste water treatment -

(ii) physico-chemical treatment;

The operator is therefore now making an application for an Environmental Permit to cover its current operations.

Emissions to air from the site are from a single main steam raising boiler and hot water boilers for hygiene and domestic hot water and heating purposes. These have been assessed and found to have an insignificant impact on surrounding ecological and human receptors.

Emissions from the effluent plant are transferred to the local Wastewater Treatment Works for further treatment prior to release back into the environment. If there is a known issue with effluent being out of consent, it can be held back in the effluent reception pit or balancing tank until compliance can be achieved. Surface water run-off from the site is routed via the surface water drainage system to a local controlled water discharge (a watercourse adjacent to the A30 and Trevenson Church) which is a tributary within the Red River catchment area.

The operator has measures in place to protect drainage systems from spills of raw materials or wastes, including secondary containment of bulk tanks, level sensors for tanks, spill procedures and spill kits including drain mats, and the ability to contain spills within the effluent reception pit. All potential accident scenarios, mitigation measures and response actions are included in the Accident Management Plan within this application.

There is considered to be no significant risk of fugitive emissions to air, odour or noise and vibration from the site.

The process is operated in accordance with the site Hazard Analysis and Critical Control Point (HACCP) plan, with operating procedures and risk assessments in place for all manufacturing operations. The process is operated in such a way as to maximise yield and minimise wastage. The operator has a rolling Continuous Improvement (CI) plan in place with opportunities regularly identified and tracked.

The operator has in place a Health, Safety and Environmental Management System which will incorporate all the requirements of the forthcoming Environmental Permit.

In addition to the raw and cured meat raw materials may be delivered in drums, IBC's and smaller containers and stored internally within the dedicated stores (chemical, engineering and food safe lubricants and oil, dry goods etc). A full raw materials inventory is provided within the application.

Energy use, water use, raw materials use and waste arisings are all measured and monitored. The operator is part of the underlying Climate Change Agreement for the food and drink sector, Agreement Identifier: FDF1/T00146 v3, Facility Identifier FDF1/F00176.

Sensitive ecological and human receptors around the site have been identified and a risk assessment carried out on the potential for the site to impact upon these receptors. Air emissions screening was carried out to assess the impact of emissions to air from the boilers. This concluded that emissions are within guideline levels and will not have a significant impact on human or ecological receptors.

The risk assessment concludes that while there is a risk of pollution of the surface water drainage system, containment and mitigation measures in place are sufficient to manage the risk within the site and to an acceptable level.