Project Name	Broxfield Farm
EPR	EPR/KP3326MQ/P001
Type (New Permit/Variation)	New

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 6.09 (version 2)

2. Farm assurance schemes – Red Tractor Assurance (and other customer specific audits and high welfare schemes)

3. Evidence of training, operating, inspection and maintenance in compliance with the manufacturers' instructions

3. Records of complaints, incidents and reporting

4. Evidence that relevant legislation is complied with

5. Records and operations as per statutory requirements (e.g. relating to Nitrate Vulnerable Zones, Farming Rules for Water, waste regulations, water resources act, health and safety, COSHH, duty of care)

6. 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)

7 Storage complies with the Silage, Slurry and Agricultural Fuel Oil regulations (SAFFO) and current BAT guidelines.

8. Manure and Nutrient Management Plans

9. Pollution Prevention and Management Plan

10. Staff are trained and are aware of their, and any contractors', responsibilities.

11. Bioaerosols, Pest, Odour and Noise Management Plans (if applicable)

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

Temperature/humidity of areas within pig housing

Weekly records of water 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.

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. Training records are maintained.

An Accident Management Plan is available to all staff.

Complaints system

Complaints relating to the farm's activity are logged and referred to the farm manager for investigation and follow up action (a copy of the form to be used can be found at the end of this document). A record is kept of any remedial action to prevent or minimise the causes and the operator 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.

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. A back up copy of the Accident Management Plan can be found in the permit holders' office in the case that the site office is inaccessible in an emergency. All staff are aware of the location and content and their responsibilities in the event of an accident.

Training and qualifications

All staff 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 accident management 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 and instruction of staff and contractors is recorded in the training plan; the training plan is kept in the site office

Site security

The sites are remote from any centre of population and benefit from an existing farm access road from the public highway. The combination of the low height of the buildings, remote nature of the site, and existing trees and hedgerows, is such that the buildings are not visually prominent within the landscape.

Sheds, stores and equipment are securely locked at night

The site gates are locked at night to prevent pedestrian and vehicle access out of hours

There are no fuel oil tanks or LPG tanks on the installation

Signs are placed around the perimeter to warn unauthorised people against entering the site

There is no public footpath through any part of the site.

Energy efficiency

Energy usage is as follows:

Energy source	Use
Electricity	Lighting, computer control systems, feed augers, water pumps, pressure washing.
Bottled gas	N/A
Diesel	Vehicles and pressure washer

Basic energy requirements

Control sensors are checked in accordance with manufacturer's instructions and kept clean so they are able to detect the temperature at the stock level

The sheds are maintained in good condition

The sheds are fully insulated to reduce condensation, heat loss and solar gain

The flooring is maintained, and damage is repaired

Electricity

No mechanical ventilation

Low energy light bulbs are used

Fuel oil

There will be a back-up generator within the installation for use in case of mains power with associated bunded fuel storage in accordance with SAFFO requirements

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, Concluding 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.

We use well maintained machinery with energy efficient engines, on a rotating replacement policy looking for the most energy efficient models.

Further potential improvement measures include:

Installing more energy efficient equipment and controllers, as appropriate, eg lighting timers

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 filed with the inventory 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 drinkers are cleaned to minimise water wastage.
Water is measured weekly by a water meter. Water usage is closely monitored; 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. Water use will then be reviewed every four years.

Avoidance, recovery and disposal of wastes

A waste minimisation review will be undertaken every 4 years 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.

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. Please refer to latest Waste Minimisation Plan.

Environmental Policy Statement (EMS)

Broxfield Farm is committed to protecting the environment by implementing policies that will achieve a sustainable, thriving business, whilst also minimising any negative impacts 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 matters.

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 habits
Using resources efficiently to minimise waste and emissions
Participating in schemes that promote efficiency
Striving for continual improvement

Meeting or exceeding all the environmental legislation that relates to the business
Actively promoting reduction, recovery and recycling of resources used, both internally and among any customers or suppliers

Climate Change Adaptation Planning

Climate projections for the UK 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 this at least every four years, or more frequently as appropriate, the adaptations the site and management may require going forwards to mitigate any risks posed by a changing climate. We will continue to ensure that we comply with the conditions of our permit.

We are working with our pig and feed supplier 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 which will be regularly updated/reviewed.

Plans are aimed to ensure our operations remain resilient at stages along a climate projection of at least 2º C global mean temperature rise by 2050. Also, assess what further requirements may be necessary along a projected 4 º C rise by 2100 – up to the projected lifetime of the permitted activity.

To anticipate and prevents 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* when developing or reviewing our management system.

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, flooring, concrete, water system, electrical systems (including ventilation), roofs, drainage systems, gutters and downpipes
Medicines/chemical store; includes bunding and security arrangements
Water tank
Feed storage silos; includes collision protection integrity as applicable
Feed delivery pipework/systems
Deadstock storage

The full annual inspection and maintenance schedule should be detailed in the tables that follow.

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. 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.