Department: HSE **Database Source**: Sharepoint/HSE **ID:** TBC	Created on: 21.10.25 by EHS Projects Modified on: N/A Reason for modification: Procedure Creation **Version 1.0**	

EMS Standard

Odour Management Plan

Department: HSE **Database Source**: Sharepoint/HSE **ID:** TBC	Created on: 21.10.25 by EHS Projects Modified on: N/A Reason for modification: Procedure Creation **Version 1.0**	

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1 Introduction

1.1 Background

The purpose of this Odour Management Plan (OMP) is to:

- Establish the likely sources of odour arising from processes at the facility,
- Set out the procedures followed at the site in order to prevent or minimise odour emissions during normal operating scenarios,
- Set out the corrective actions and remedial measures utilised to prevent or minimise odour emissions during abnormal and emergency events, and,
- Formalise the procedures for dealing with any odour complaints.

The OMP has been prepared with reference to the following best practice guidance:

- 'Odour Management Plan: comply with your environmental permit' 2025
- BAT 15 (Odour), in, Best Available Techniques (BAT) Reference Document for the Food, Drink and Milk Industries. Industrial Emissions Directive 2010/75/EU (Integrated Pollution Prevention and Control). Joint Research Centre, 2019.

In accordance with the stated guidance, this OMP has been designed to:

- Employ appropriate methods, including monitoring and contingencies, to control and minimise odour pollution;
- Prevent unacceptable odour pollution at all times; and,
- Reduce the risk of odour releasing incidents or accidents by anticipating them and planning accordingly.

This OMP has considered sources, releases, and impacts, and used these to identify opportunities for odour management.

1.2 Utilisation

This document is controlled by the Health, Safety and Environment (HSE) Manager for the Site, it is stored in the sites EMS SharePoint system and access is given to all relevant operators. Relevant operators are trained on odour management at the commencement of their employment and refresher training is conducted as deemed necessary by the HSE Manager.

This document will be reviewed annually, or when there has been a change to site processes that are likely to have an impact on the odour profile. If an odour report is received and this OMP does not adequately reference the steps needed to manage the incident, then the OMP will be updated to reflect this.

1.3 Site Location

The Site comprises an approximate 4.05ha plot residing in Milton Keynes, Buckinghamshire, within the Wymbush industrial estate. The Site is centred on National Grid Reference SP 822 392.

Site name: Brioche Pasquier UK Limited

Site address: 8 Garamonde Dr, Wymbush, Milton Keynes, Buckinghamshire, MK8 8DF

Operator name: Brioche Pasquier

Permit number: TBC

1.4 Site Description

1.4.1 Production overview

Brioche Pasquiers Milton Keynes facility, hereafter the 'Site', produces baked brioche products for both the Pasquier brand and other major retailers. The Site comprises an approximate 4.05ha plot residing in Milton Keynes, Buckinghamshire, within the Wymbush industrial estate and employs approximately 300 people. On Site, processes involve raw materials delivery, ingredient preparation and mixing, fermentation, baking, packaging and distribution. Products are distributed across the United Kingdom.

2 Odour Management Plan

2.1 Overview

The OMP for the facility follows and addresses the various activities which have the potential to create odour. The following steps were undertaken in order to produce the OMP:

- Identification of odour sources,
- Formalisation of odour control measures,
- Formalisation of odour monitoring procedure,
- Formalisation of meteorological monitoring procedures,
- Production of emergency operating procedures and odour control measures,
- Production of a complaints handling procedure,
- Production of an OMP modification procedure,
- Consideration of site location and sensitive locations potentially affected by odour emissions; and,
- Risk assessment of potential issues.

2.2 Sources

Odour risks at source are classified and outlined in Table 1 below; this rating utilises the benchmarking guidance provided in the EA's Odour management: comply with your environmental permit. The specific odour sources identified on site are summarised in Table 2.

Table 1: Odour Source Definitions

Category	Intensity Description	Risk Rating
0	No odour	Low
1	Very faint odour	Low
2	Faint odour	Low
3	Distinct odour	Medium
4	Strong odour	Medium
5	Very strong odour	High

Category	Intensity Description	Risk Rating
6	Extremely strong odour	High

Given the product ranges produced, it is considered that raw materials are most likely to give rise to odour emissions when cooking or processing of baked goods and in the management of process related waste materials. Fermenting and baking dough are the most likely constituents that will have the potential to give rise to odorous emissions but can only lead to impacts where a pathway and receptor are present. The primary stages/processes within the production area with the potential for odour release, which may themselves be considered sources, are:

- Handling of raw materials
- Fermenting, and baking; and
- Cooling, handling and packaging of products
- Storage of waste generated on site.

Whilst there is the potential for odours from waste, all the ingredients used are pre-prepared and therefore, there will be no significant food waste (such as husks or peels from vegetables or spices) as these will have been removed at source. As such, there is a residual potential for odour resulting from any remaining contamination on plant and packaging, which are kept to a minimum.

2.2.1 Receipt of potentially odorous materials

All raw materials are delivered to site via road in HGVs. Deliveries are made frequently throughout the day, 7 days a week. Where possible priority is made for deliveries to be received during daylight hours, however this cannot be guaranteed dependent upon production and customer demands.

For all deliveries, food safety standards and Hazard Analysis and Critical Control Points (HACCP) procedures are followed. Following these protocols ensures the highest food safety standards are implemented which extends to the identification of unacceptable material delivery and screening of unacceptable odour risk from raw materials.

2.2.2 Site Odour Sources

For information on the maximum amount of each material being stored on site at any one time, refer to the materials inventory.

The duration with which materials are stored on site varies depending upon the nature of the raw material. HACCP procedures in line with food safety standards are followed to ensure the duration of which raw materials are stored on site never exceeds the recommended timescales as per the specific raw material specification.

Table 2: Site Odour Sources

Process Area / Source		Odour Source/Material Description	Odour Source Potential	Emission Characteristics	Risk Rating
S1	Raw materials receipt and product despatch areas.	Chilled and ambient ingredients, packaged ingredients and goods.	**1 – Very Faint Odour**	Odour concentrations are likely to be low as a result of the nature of the materials that are being processed and storage arrangements. Air is extracted from within the goods in and preparation sections as part of a standard number of air changes within the building. Dividing walls and doorways separate the goods in and preparation sections from the rest of the facility. However, there are a number of personnel doors which lead to the external environment. As such, there may be the potential for fugitive emissions to atmosphere.	Low
S2	Dry ingredient storage and mixing	LEV system release (post bag filter) and potential for fugitive emissions when doors are opened building air handling	**2 – Faint Odour**	Odour concentrations are likely to be low as a result of the housekeeping controls and containment of the materials that are being processed and storage arrangements limiting fugitive emissions to atmosphere.	Low
S3	Product fermentation	Potential for emissions from the fermentation process	**2 – Faint Odour**	Although fermentation can have a distinct odour, appropriate containment and extraction reduce this to minimal levels. Therefore, odours are unlikely to be noticeable or distinct from ambient background.	Low
S4	Product baking	Potential for emissions during product baking	**2 – Faint Odour**	Baking is contained to large, enclosed process ovens which reduce the potential for odours to escape. Once baked, products are transferred directly to enclosed cooling areas where any odours are extracted, odours are unlikely to be noticeable or distinct from ambient background.	Low

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Process Area / Source		Odour Source/Material Description	Odour Source Potential	Emission Characteristics	Risk Rating
S5	HVAC emissions from processing lines and wash room extraction.	Odours associated with ambient factory air.	**1 – Very Faint odour**	Internal areas are subject to robust hygiene practices in response to food and personnel safety. Air is extracted from within the goods in and preparation sections as part of a standard number of air changes within the building. Dividing walls and doorways separate the goods in and preparation sections from the rest of the facility.	Low
S6	Waste receptacles.	Odours generated by putrefying food or any residual materials on waste packaging.	**2 - Faint odour**	All wastes are stored in a separate waste storage area pending removal. Wastes removed from site in short timescales prior to odour generation. The amount of residual putrescible material on waste packaging will be limited as a result of preliminary cleaning operations prior to disposal. As such, the intensity is likely to be low.	Low



Figure 1: Odour sources across the site. S5 refers generally to various vents serving the production halls (individual vents not labelled).

As per Figure 1, the site consists of one large main building within which all materials are stored within, refer to the materials inventory for further detail.

2.3 Pathways

Airborne transmission of odour is the only likely pathway to distribute odour from site to receptors. The potential for atmospheric emissions to impact at sensitive locations depends significantly on the meteorology, particularly wind direction, during release.

Weather patterns have been sourced from Meteoblue, the diagrams below outline 30-years of hourly weather model simulations for Milton Keynes. It is anticipated that conditions are representative to the site when interpreting weather averages for Milton Keynes due to the site's proximity to the city. The data were therefore considered suitable for an assessment of this nature.

2.4 Prevailing Meteorological Conditions

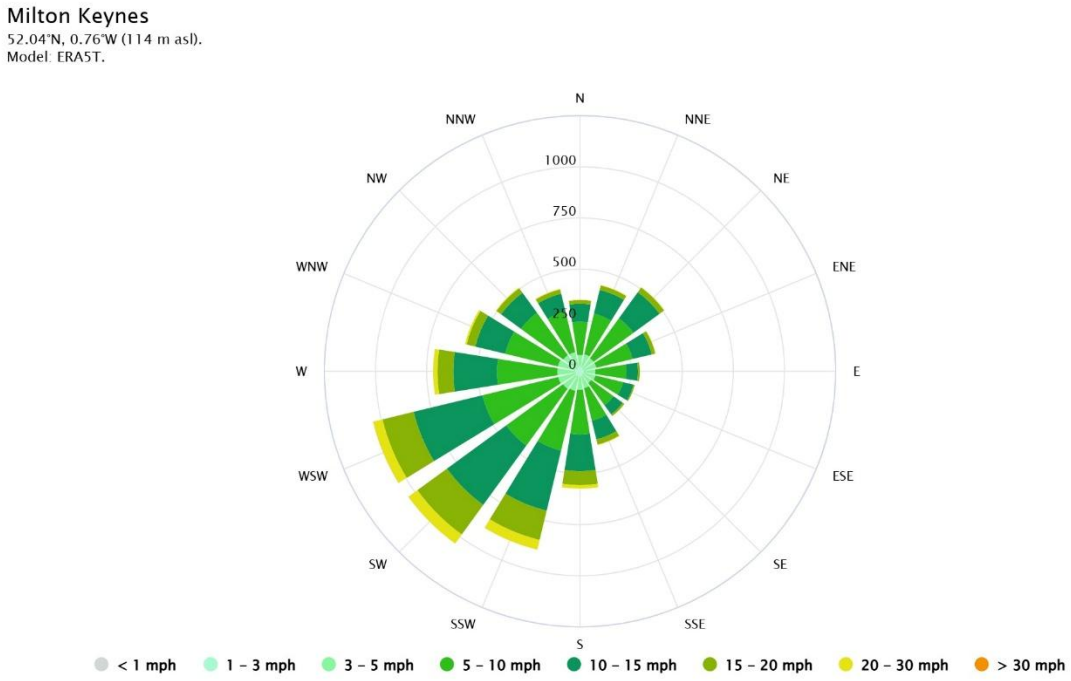


Figure 2: Prevailing Wind Direction for Milton Keynes – 30-year average (Source: Meteoblue)

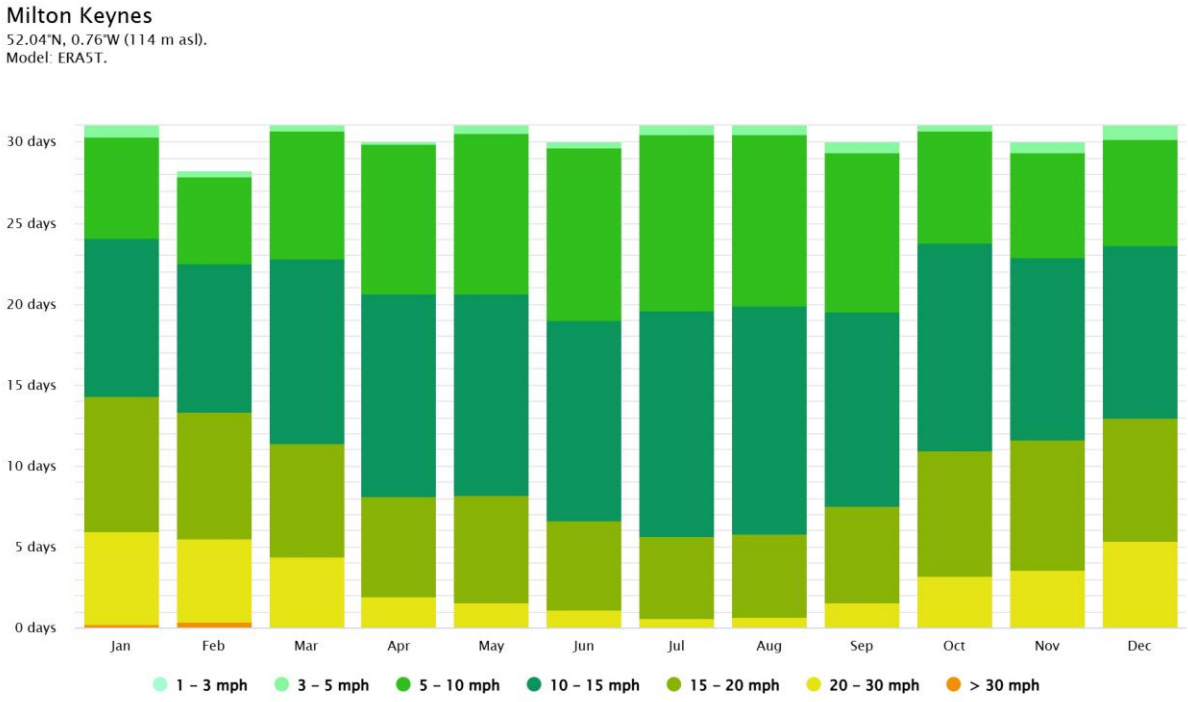


Figure 3: Wind speed days per month for Milton Keynes – 30-year average (Source: Meteoblue)

As shown above, the prevailing wind direction at the Site is from the west-southwest and southwest directions. Winds from other directions are relatively infrequent, which is indicative of conditions throughout much of the UK. Wind speeds remain below 20mph for most of the time in each month of the year, with the autumn and winter months showing the strongest wind speeds.

2.5 Receptors

The identified receptors and associated sensitivity are summarised in Table 3.

Table 3: Sensitive Odour Receptors

Ref	Receptor Description	Direction from site	Distance from site boundary	Sensitivity
R1	Residential properties Two Mile Ash 482125 , 239092	Southwest	80m at the closest point	Medium
R2	Residential properties Wymbush 482373 , 238905	South	340m at the closest point	Medium
R3	Residential properties Hodge Lea 481713 , 239620	Northwest	515m at the closest point	Low
R4	Residential properties Bradwell 483188 , 239261	East	730m at the closest point	Low
R5	Residential properties Bancroft 482797 , 239978	Northeast	915m at the closest point	Low

Odour episodes tend to occur during stable atmospheric conditions with low wind speed, which gives poor dispersion and dilution; receptors close to the source in all directions around it can be affected under these conditions. The distance between the site and closest residential dwellings is less than 100m. This is not a substantial buffer for dispersion during periods of low or no winds, however the prevailing wind direction will disperse odours away from these settings and therefore the overall risk rating has been determined at ‘medium’ for R1 and R2.

The Institute of Air Quality Management (IAQM) guidance 6 states that 'when conditions are not calm, it will be the downwind receptors that are affected. Therefore, receptors that are downwind with respect to the prevailing wind direction tend to be at higher risk of odour impact.'

The downwind receptors for the Site are at least 730m away from the site at their closest point, it is therefore anticipated that due to the faint- very faint odour sources on site and the substantial dispersion buffer, the actual odour that could be carried towards any individual receptor is very small. The risk rating for R4 and R5 are therefore ‘low’.

For R4, as there is a substantial dispersion buffer, and the prevailing wind will not carry odour in the direction of the receptor, the risk rating is therefore determined as ‘low’.

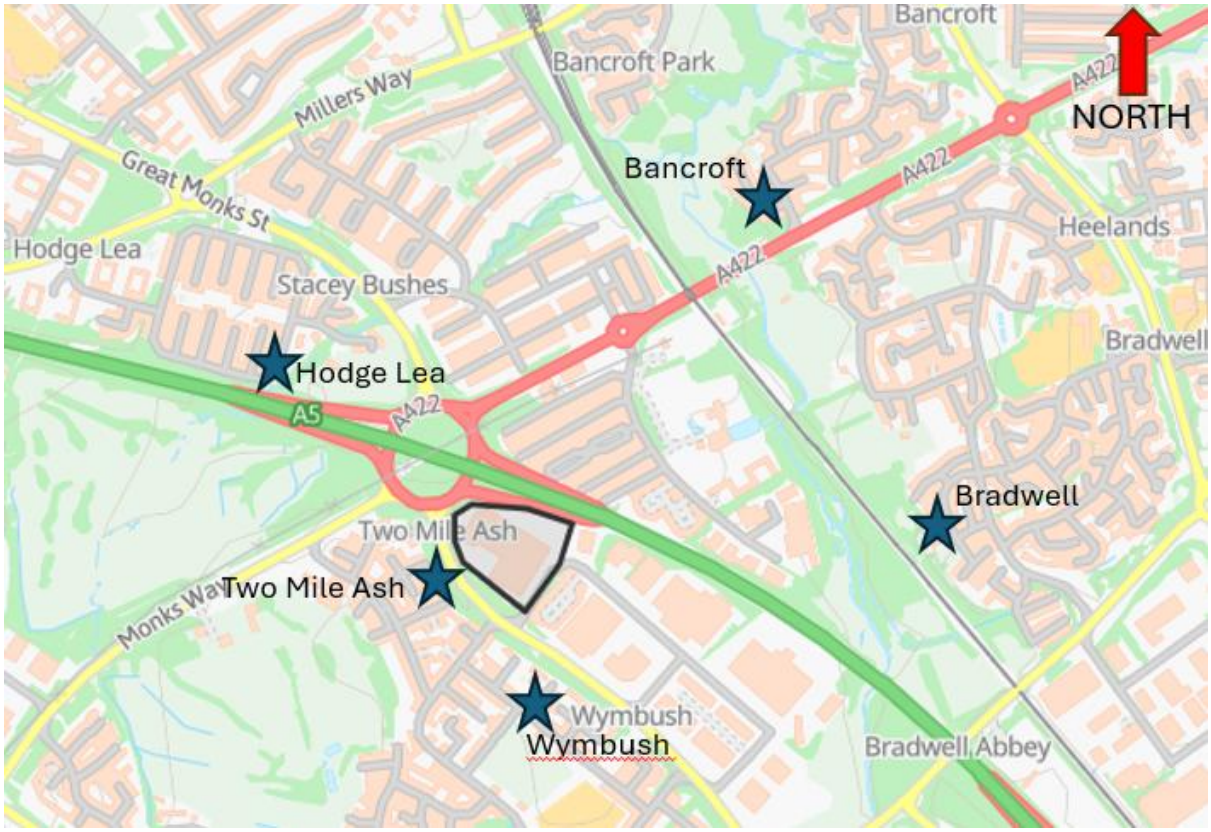


Figure 4: Location of sensitive human receptors

2.6 Odour Control Measures

Appropriate measures will be employed at the facility in order to control and minimise odour pollution. These have been determined with reference to relevant best practice guidance and are summarised in **Error! Reference source not found.**.

Table 4: Odour Control Measures

Facility Area	Source of Odour	Odour control Measures
Raw materials receipt, storage and product despatch areas.	Chilled ingredients, packaged ingredients and goods.	• All personnel and material transfer doors which link each section of the plant to other areas of the facility and the external environment will be kept closed at all times other than when access is required. • Any solid waste materials generated during processing activities will be deposited in designated receptacles and then transferred externally pending removal from site. All solid wastes will be removed from the lines. • All areas will be cleaned down on the basis of 'clean as you go' and planned hygiene windows. • Appropriate hygiene chemicals will be used and continually reviewed by competent third-party providers to ensure waste materials are cleaned and removed prior to putrefaction and associated odours. • Regular inspection of each section will be undertaken by site operatives to ensure that the clean down operations have been carried out to an appropriate standard and there are no residual odorous materials present on floor surfaces or drain covers.
HVAC emissions from	Odours associated with ambient production air.	

processing lines.		• Monitoring of temperatures will be undertaken in order to ensure that all refrigeration plants are performing effectively. Any deviations from specified temperature thresholds will be reported immediately to a site engineer so that investigative and if required, remedial works can be undertaken.
Extraction from ovens	Odours associated with baking goods	• As above plus process safety critical set points that including temperature and process controls exercised over enclosed cooking vessels. • Regular cleaning of the production area, including the building fabric/floor, food preparation equipment and extraction plant.
Solid and liquid waste and the waste yard	Odours generated by any residual materials on waste packaging or putrefying food waste.	• Timely removal of wastes prior to putrefaction and odour generation. • The food wastes are stored in sealed units and therefore the waste and waste packaging will not be exposed to the elements during storage. • Inspection and maintenance of all waste tanks and waste yard assets and infrastructure. Any evidence of damage or disrepair which has the potential to compromise containment of odorous air will be recorded and reported immediately to a site engineer so that appropriate remedial works can be undertaken.

2.7 Odour Monitoring

2.7.1 Procedure

Sniff testing is a common form of odour monitoring that can be undertaken for relatively low cost with little formal training. While a number of factors need to be taken into account in order to minimise inconsistencies, it can provide good evidence of odour conditions in the vicinity of specific activities.

If required to do in response to a compliant or suspected odour issue the site will carry out sniff tests as stipulated below. These tests will be carried out over four locations and be undertaken at intervals prescribed by the HSE department to take account of specific activities and shift patterns. See Figure 5 for the specific locations. In addition, site testing may be undertaken at publicly accessible locations to the sensitive receptor locations identified in Figure 4.



Figure 5: Sniff test locations

The assessor will stand at the first monitoring position for a specific period of time and record any odour experienced. Notes on odour frequency, intensity, duration, and offensiveness are recorded, as well as the prevailing meteorological conditions. The test will then be then repeated at each remaining monitoring point around the site to determine the extent of odour impact. The results will be analysed in association with operating conditions during the survey in order to consider the most significant odour sources, how these may affect sensitive receptors around the facility and help inform any necessary mitigation.

The following parameters will be scored at each monitoring location during each survey:

- Odour detectability / intensity,
- Odour duration and pervasiveness,
- Character of odour,
- Odour offensiveness; and,
- Meteorological conditions.

Categories for the recording of odour intensity and extent are summarised in Table 5.

Table 5: Odour Intensity Scoring System

Category	Intensity Description	Risk Rating
0	No odour	Low

Odour Management Plan

Category	Intensity Description	Risk Rating
1	Very faint odour	Low
2	Faint odour	Low
3	Distinct odour	Medium
4	Strong odour	Medium
5	Very strong odour	High
6	Extremely strong odour	High

The offensiveness of any odour will be recorded in accordance with the categories shown in Table 6.

Table 6: Odour Offensiveness Scoring System

Category	Offensiveness Description	Risk Rating
1	Less offensive	Low
2	Moderately offensive	Medium
3	Most offensive	High

Meteorological conditions during the survey, including wind speed and direction, cloud cover, temperature and precipitation will be noted, as well as assessor name, process conditions and details of any deliveries received.

Where practicable, the surveys will be undertaken by the same member of the Health, Safety and Environment Team, except on occasions of unavailability of staff. In these circumstances, an alternative assessor will be nominated. Consideration will be provided to the sensitivity of the individual nominated to undertake the monitoring, with anyone with a poor sense of smell excluded and an alternative member of staff identified if required.

2.8 Reporting and Remedial Action

Should the monitoring indicate that there is the potential for detection of moderate or offensive odours at the locations and/or pervasive odours with intensities greater than usual, potential sources will be investigated and suitable measures implemented to ensure emissions do not cause adverse effects at any sensitive location in the vicinity of the site. These may include removal or covering of material, changes to operational procedures, implementation of additional control measures or other appropriate actions deemed necessary by the HSE Manager.

Survey results that identify odour issues would be raised in line with the corporate site HSE reporting platform and practices.

2.9 Facility Monitoring and Maintenance Schedule

The operator will carry out a programme of monitoring and maintenance to ensure that all plant installed at the site performs correctly and provides effective containment of emissions. All observations will be recorded to allow comparison with operating parameters specified by suppliers of plant and examination of long-term performance trends. The operator will undertake appropriate maintenance and remedial work as necessary to ensure that optimum performance is achieved.

2.10 Corrective Actions and Contingency Measures

Should the results of the odour monitoring indicate that there is the potential for significant odour impacts in the vicinity of the site there may be the requirement for implementation of contingency measures at the facility. In addition, corrective actions may need to be taken if the scheduled monitoring and work demonstrates system failure or a compromised level of odour control.

A summary of the contingency measures that are applicable to the operations at the facility is provided in Table 7.

Table 7: Contingency measures

Scenario	Process Area / Source	Contingency Measures	Backstop Measures
Detection of moderately or most offensive odours, or odour intensities which exceed usual levels	Applicable to all process areas / sources	Within 1-hour of detection of moderately or most offensive odours, or odour intensities which exceed usual levels, a full investigation will be undertaken to identify potential sources. This will initially focus on process areas and sources within the immediate vicinity of the relevant monitoring location(s) and if required, progressively extend to the rest of the facility. Following identification of potential sources, contingency measures will be considered and if required implemented at the site. These may include: • Containment of materials within receptacles using lids • Removal of receptacles from process areas to the waste storage area, if appropriate • Repair work to restore process area/ source containment. • Changes to automated and manual processes. • Cleaning of process areas. • Placement of putrescible materials in cold storage. Further monitoring and inspection will be undertaken within 1-hour of implementation of the relevant measure(s) in order to ascertain whether control has been restored. Should this process indicate that there is still the potential for significant odour impacts, backstop measures will be considered and, if required, utilised.	The following backstop measures will be considered and, if required, utilised should the stated corrective actions fail to restore control: • Diversion of all pending deliveries to an alternative facility or delay of delivery • Suspension of all processing operations • Instruction of an emergency waste collection Further monitoring and inspection will be undertaken within 1-hour of implementation of the relevant measure(s) in order to determine whether normal operations can be re-established.

Scenario	Process Area / Source	Contingency Measures	Backstop Measures
Failure of the refrigeration system	Refrigerated process areas	Within 1-hour of detection of refrigeration failure, contingency measures will be considered and if required implemented at the site. These may include: • System reset, • Repair work by an engineer to restore refrigeration to process areas, • Containment of all materials within securely lidded containers. Should the system reset, or repair work fail to restore refrigeration, appropriate backstop measures will be implemented.	The following backstop measures will be considered and, if required, utilised should the stated corrective actions fail to restore control: • Diversion of all pending deliveries to an alternative facility or delay of delivery • Suspension of all processing operations • Instruction of an emergency waste collection Further inspection will be undertaken following implementation of the relevant measure(s) in order to determine whether normal operations can be re-established
Detection of offensive odours from processing area	All production areas.	Within 1-hour of detection of offensive odour from point source emissions points, contingency measures will be considered and if required implemented at the site. These may include: • System reset, • Evaluation of critical set point, on oil temperatures and filtration systems, • Repair work by an engineer to restore relevant systems. Should the repair work fail to prevent odour, appropriate backstop measures will be implemented.	The following backstop measures will be considered and, if required, utilised should the stated corrective actions fail to restore control: • Diversion of all pending deliveries to an alternative facility or delay of delivery • Suspension of all processing operations • Instruction of an emergency waste collection Further monitoring and inspection will be undertaken within 1-hour of implementation of the relevant measure(s) in order to determine whether normal operations can be re-established.

2.11 Abnormal / Emergency Scenarios

There is the potential for increased odour emissions during certain abnormal and emergency scenarios which have not been considered in previous Sections of the OMP. The relevant actions to limit impacts during these situations are outlined in Table 8.

Table 8: Abnormal and emergency response scenario

Scenario	Operator Response
Severe failure of site infrastructure	In the very unlikely event that damage is caused to the structure of the processing building, there may be an increased potential for fugitive odour emissions. In this instance, appropriate repair work would be undertaken by site engineers or a specialist contractor as a matter of urgency. In the event of prolonged failure of site infrastructure, a review of operations will be undertaken and, if appropriate, the backstop measures specified in Table 8 will be implemented
Power failure	The risk of prolonged power failure is considered negligible. However, relevant emergency procedures and back-up facilities are in place should this event occur to ensure the process is not affected as far as practicable. This is likely to avoid any unexpected odour emissions with the exception of those already addressed in this table.
Fire and/or explosions	A fire on site may lead to exposure of odorous materials to atmosphere, as well as emissions of odorous combustion products. Any fire would be extinguished as a matter of urgency by the emergency services. This would reduce the duration of any odour effect as far as practicable. Any odorous materials released by fire would be cleaned by a site operative or specialist contractor. If any infrastructure is damaged this would be repaired or replaced as a matter of urgency.
Staff unavailability due to industrial action, sickness etc	Staff unavailability may affect facility operations. If this was the case emergency cover would be arranged to ensure the process is not disturbed
Extreme weather events such as prolonged rainfall, lightning strikes, flood etc	The risk of additional odour emissions due to extreme weather events is not considered significant.

2.12 Odour Complaint Procedure

Full details of any justified complaints received direct to the site will be provided to the EA in accordance with the Notification requirements specified in the applied for Environmental Permit for the facility.

Any received odour complaints will be dealt with by the HSE Manager, or an alternative member of the management team in the first instance.

The first stage of the procedure will involve collection of basic details in regards the event, either directly from the complainant or from the EA officer reporting the incident. This will take place within 24-hours of a complaint being received and will include acquisition of the following information which will be recorded on the form included at Appendix 1 of the OMP:

- The name and address of the complainant,
- The date and time of odour detection,
- A description of the odour detected including details of the character and intensity; and,
- The duration and pervasiveness of the odour.

The following additional information will then be recorded on the form by the member of the team assigned to the complaint:

- The activities taking place at the time of the complaint,
- The operating conditions at the time of the complaint; and,
- The prevailing meteorological conditions.

After details of the complaint have been compiled, the cause(s) will be investigated. The specific procedures will depend on the nature of the incident and details provided by the EA and/or complainant. However, in most cases the process will involve identification of contributory odour sources and consideration of the following elements:

- The effectiveness of process controls,
- The effectiveness of containment measures,
- The performance of treatment systems; and,
- The effectiveness of dispersion methods.

Where an investigation identifies an odour issue, remedial action will promptly be implemented. The exact measures will be determined based on the odour source and the likelihood of incident reoccurrence.

Details of any actions undertaken in response to complaints will be recorded on the form included at Appendix 1. In addition, the OMP will be reviewed following receipt of any complaint in order to ensure that the control measures employed at the site are appropriate. Any changes made to the OMP will be recorded on the relevant form included at Appendix 1.

2.12.1 Interactions with the Site

Members of the public, neighbouring businesses and any other interested parties are able to contact the Site via their reception or online contact form. The Site welcome any feedback on odour and any report will be handled and considered as per the above odour complaints procedure.

2.13 Operator Training

All relevant operators are trained in the responsibilities they hold with regards to managing odour on site. As stated in the compliant procedure above, the HSE Manager is responsible for dealing with any odour reports and is trained at induction on the steps required to fulfil the procedure. Other operators, including reception staff who are most likely to receive the odour reports are trained on taking the appropriate information and escalating the report to the HSE Manager.

All odour training is conducted internally at induction, any additional training is undertaken as deemed necessary by the HSE Manager, additional training could be triggered by a change in site procedures that are likely to have an impact on the odour profile, or other factors, again this would be conducted as deemed appropriate by the HSE Manager.

3 Document control log

Version	Author	Date	Changes
1	EHS Projects	January 2026	Document creation

Appendix 1 – Odour Complaints Form

NOTE: This form should be used for recording details of any odour complaints.

1. **Reporting of odour complaint on (date):**
2. **Name, telephone number and address of complainant:**
3. **Details of complaint:**
4. **Date, time and duration of odour:**
5. **Description of odour including character, intensity, duration and pervasiveness:**
6. **Meteorological conditions during incident:**
7. **Potential sources or activities that could give rise to odour during incident:**
8. **Operating conditions at time of incident:**
9. **Date and time of complaint follow up call:**
10. **Action taken:**

Details of any required amendments to Odour Management Plan or site operation:

Signed:…… Date: ……