Compliance Assessment Report CAR_NRW0039833

Permit being assessed: FP3095ET.
For: Locks Yard, held by South West Wood Products Ltd
At: Heol Llan, Coity, Bridgend, CF35 6BU.

Type of assessment carried out: Report/Data Review, Reason: Other.
On 27/04/2022.
Parts of permit assessed: D2

NRW Lead Officer: Elysia Lovelock.
Report sent to: Site Manager, Site Manager on 29/04/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
D2 - Incident Management - Accidents, emergency and incident planning	C3 Minor	3.8.1

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
1	4

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
D2	Please provide a suitable date/timeframe to be agreed with NRW, whereby a revised FPMP can be submitted to NRW for review, within 14 working days. It is likely this will be formalised in a Notice.	17/05/2022

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Following the review by Natural Resources Wales and South Wales Fire and Rescue Service, of version 2 of the Fire Prevention and Mitigation Plan provided by the Operator, for use at Locks Yard, Bridgend, under Environmental Permit EPR-FP3095ET. The operator was advised that the proposed measures and justifications provided, did not meet a standard that is equivalent or superior to the standards outlined in guidance note 16. Further details can be found in Compliance Assessment Report, reference CAR_NRW0038342.

Of note, the operator was advised regarding the proposed stockpiles and separation distances and use of Version 2 was not agreed and a date for when a revised version could be provided by the Operator, was required by 18th June 2021.

On 31st August 2021, the operator provided Fire Prevention and Mitigation Plan, version 3 with a site plan. Following a discussion with Mr Dunn on 8th September 2021, version 4, to contain the following agreed amendments, was received on 11th September 2021:

- Procedures that ensure emergency access route is viable in the event of an emergency (addressed in point 1.13)
- Details of the additional standby tank and pump to support the sites drainage provisions (addressed in point 4.40)

Version 4 of the document received did not contain a site plan, referred to within the document on the last page, as reference Drawing LMM/039/03-Permit Plan. A Site plan is required by the Fire Prevention Plan guidance, therefore an amended version of version 4, was subsequently requested and provided by the Operator on 7th October 2021.

Considerations

In assessing the suitability of the sites Fire Prevention and Mitigation Plan, the main assumptions made include:

- A Fire Prevention and Mitigation Plan is a site-specific document, and as such, must be assessed in isolation, on its own merits, in relation to the site it is intended for use at, as per the guidance.
- Natural Resources Wales do not work in line with guidance issued by the Environment Agency and therefore, Fire Prevention and Mitigation Plans for use in Wales must be written, in accordance with guidance issued by Natural Resources Wales.
- Natural Resources Wales and the Fire and Rescue Service have not endorsed the use of BRE reports in Wales, and therefore cannot be used within Fire Prevention and Mitigation Plans, as justification for deviating from the guidance.
- Natural Resources Wales can consider alternative measures, however this on the basis that the fundamentals of the Fire Prevention and Mitigation Plan meet the guidance.
- The Fire Prevention Plan guidance stipulates information which ‘must’ be included.
- The Fire Prevention and Mitigation plan provided details ‘alternative measures’, as opposed to ‘additional measures’.

Outcome

Natural Resources Wales acknowledge that the Operator wishes to deviate from the Fire Prevention and Mitigation Plan guidance and in doing so, has detailed **alternative** measures, however the justifications and proposed measures are not considered to meet a standard that is equivalent or superior to the standards outlined in guidance note 16, as per the rationale and information detailed below. Natural Resources Wales therefore, do not agree the use of Fire Prevention and Mitigation Plan version 4 (as amended) at Locks Yard, Bridgend. The justifications provided in the Fire Prevention and Mitigation Plan to deviate from the guidance do not suffice.

The information that is considered mandatory in the guidance, has not been included in the plan provided, therefore please review the requirements of the guidance and revise contents of the plan accordingly. Some prevalent issues have been highlighted in this review, however, please ensure the entire document is reviewed in line with the requirements of the guidance, as failure to do so could cause further delays in the reviewing process by Natural Resources Wales.

Initially, I note the changes discussed with Mr Dunn and as outlined above in relation to version 4. The FPMP does not detail any procedures to ensure that the emergency access is kept, point 1.13 is a statement that says that the main access and secondary access will be kept clear at all times. The FPMP needs more information here as to how you will ensure that it will be kept clear.

Rationale

The fire prevention plan guidance recognises that there is risk involved in managing combustible material and therefore the standards in the guidance represent the minimum standard of measures required, to ensure this risk is managed appropriately. The FPMP acknowledges that unprocessed wood, stored in its unprocessed form, is low risk. This is insufficient, as self-combustion is not the only risk factor. And size of stockpiles, separation distances and water supply remain relevant. The FPMP provided includes some alternative measures to address these issues. However, please refer the section below on '**alternative measures'** for further information on what is required.

Stockpile Dimensions & Layout

The stockpile dimensions and layout are a key consideration, as the stockpiles and layout on site have the potential to either prolong an incident or curtail an incident. In relation to this, the FPMP states in point 2.2.7 'all these areas are still within range of the firefighting jet mounted on the tractor and trailer for firefighting purposes.' The FPMP requires more information here, such as:

- How are all the areas within range of the firefighting jet mounted on the tractor?
- What are the specifications of the jet? i.e. flow rate.
- What is the range of the firefighting jet?

- How much water is available using the tractor and trailer?
- How long would this supply last?

Widths

The FPMP states stack of between 14 - 26 metres wide and guidance states that stack widths of 20 metres, are only appropriate where access for plant/machinery is available from both sides. Due to the size constraints of the site, this is not possible at Locks Yard. Where this is not possible, guidance states stockpiles should not exceed a maximum of 10m. This is based on practical fire-fighting considerations. Information from the Fire and Rescue Service indicates that stack widths of more than 10 metres (with access from one side) start to degrade the effectiveness of standard fire hoses, in applying water to the 'seat' of a fire, which would result in spraying water in the air.

Heights

The FPMP states stack heights of 7m and the maximum stack height of the guidance is 4 metres, which is based on practical firefighting and stability considerations for the Fire and Rescue Service. You have proposed an alternative measure to mitigate the increased risk. Please refer to the section below on alternative measures, for the information that is required here in the plan.

Both the width and height of a stack are assumed to conform with the guidance, when determining the stack length and calculation for the required separation distance.

Lengths

The stack lengths included in the FPMP do not consider the separation distance required for stacks of their size.

Separation Distances

The separation distances of 6m are insufficient for the stack sizes outlined in the plan and a calculation is required to determine the appropriate separation distance, as the separation distances required vary dependent on the length of a stack. The justification that this is in accordance with Environment Agency guidance is insufficient. Further information is required here in the plan. Please refer to the information contained below, under ‘alternative measures’, for details.

Separation distances are paramount due to the radiant heat that a fire in the largest stack could emit, effecting adjacent piles and having the potential to hinder or prolong firefighting efforts to extinguish a fire incident, should one occur. The minimum road width for a fire engine is 3.7m and gangway is 3.2m. There is little provision for separation gaps around the boundary/perimeter of the site and radiant heat would not stop at the boundary.

The standards highlighted above are just some of the standards in the guidance that represent the minimum appropriate measures, required to be put in place by waste operators

to ensure that fires on site are either prevented or can be mitigated accordingly. The information included in the plan does not satisfy Natural Resources Wales that the: likelihood of fire, impact from emissions during or after a fire on the local community, critical infrastructure and the environment, resources required by the NRW and other emergency responders during an incident, post incident clean-up and remediation costs, would be equivalent or less than would be incurred, if the site followed the minimum standards, in the regulatory guidance.

You state the aim of the FPMP under '4.20 Smoke/Air Pollution', is to minimise any fire incident duration. Suitable stockpile sizes and appropriate separation distances would facilitate this, as well as a sufficient water supply. Regarding the aim of the FPMP, please refer to the Fire Prevention Plan objectives listed under 'alternative measures' below.

Water Supply

The FPMP acknowledges that the site does not have the capacity to handle the volume of water required to extinguish a fire in the largest stack, in accordance with the calculation in the guidance.

As the site cannot suitably cater for a fire occurring on this scale, in terms of the amount of water required, the Operator has provided details of the use of **wetting agent** as an alternative measure, to reduce the amount required on site in the first 3 hours by 90%. Please see below under 'alternative measures' for the additional information we require.

In the event of a fire occurring outside of normal operating hours, consideration must be given to the time required between detecting a fire (automatic or visual), to applying the agent to an established fire in the largest stack (26m wide) with limited access and the issue of radiant heat, as access from 3 sides, only allowing 6m separation between stacks and building. As previously outlined, information provided by the Fire and Rescue Service suggests that stack widths of more than 10 metres with limited access, start to degrade the effectiveness of standard fire hoses in applying water to the 'seat' of a fire.

I note in the water calculation, you are using the 'shaped' volume (6715.8m^3) to determine how much water would be required to extinguish a fire in the largest stack, with the volume stating 7462m^3, reducing this by 746.2m^3. Therefore, more information is required in the FPMP here, as follows:

- Please include the rationale for how the volumes are shaped, to justify the use of this reduced amount in the calculation.

Based on your own calculation, to demonstrate the advantages of using wetting agent, your calculation is as follows:

6715.8m^3 x 6.6 x 60 x 3 = 7,978,370.4 litres (required without wetting agent)
7,978,370.4 – 90% = 797,837.04 litres (required with wetting agent)

Therefore, the total volume of water that would need to be available in the first 3 hours (using wetting agent) based on your own calculation, would need to be 797,837.04 litres, providing water at a rate 2000l/ per minute. However, there is a deficit in the remaining 10% that would

be required.

The plan states the total volume available in the first 3 hours is 568,500 litres. This leaves a deficit of 229,337.04. Therefore, whilst wetting agent does appear to significantly reduce the amount of water required, according to the information contained in the plan, if its use were to be agreed, there would still not be enough water required (with wetting agent), to tackle a fire in the largest stack for the first 3 hours.

The FPMP states there is a top-up capacity available of 373,500 litres using the bore hole and hydrant. However, the flow at which this could be provided has not been established. The FPMP states it is 'probable' that the hydrant could provide this at a 2000 l/m. Further information is required in the FPMP here, such as:

- Specifications of the hydrant.
- How will you ensure the 'top up' is available at a rate 2000 l/m, if you do not know the flow rate of the hydrant? The bore hole cannot provide this (at 75 l/m).

Furthermore, the amount of water required to tackle a fire in the largest stack could vary considerably, depending on the fire-fighting strategy that could apply during an incident, depending on the circumstances of a fire on site. Larger stockpiles with smaller separation distances, may have the potential to impede the sites firefighting strategy, as the radiant heat could limit access to areas of the site, potentially impacting on the duration of an incident.

Issues previously highlighted and discussed on site with the Fire and Rescue Service and Natural Resources Wales, specifically to do with the fire plan, have not been considered in the amended plans submitted to date. As the Fire Service indicated on site that the area earmarked to access the water tanks or for the FRS to park equipment is not suitable for either use. Further information is required here within the FPMP, as follows:

- Please evidence that the firefighting strategy and available provisions have been jointly agreed with South Wales Fire and Rescue Service, including point 4.19, which details access to the water tanks and space to park equipment.

As the site cannot fulfil the amount of water required to extinguish a fire in the largest stack in accordance with the guidance, with justification in point 4.38 being that 'the quantity of water is completely disproportionate for the site of this size', 'this would not be a possible or practical operation from a fire perspective; it would also completely flood the area in minutes.', is not sufficient justification to deviate from the guidance.

This aspect will require further consultation with the Fire and Rescue Service by Natural Resources Wales.

Natural Resources Wales are also in discussion regarding the potential for any environmental impact from the use of the specified wetting agent, to determine its suitability and if agreed, whether the Operator would be required to undertake any remediation after use. Please consider in the FPMP that the operator may be required to undertake remediation, if required by Natural Resources Wales.

Site Plan

Accessing the water tanks behind the sheds were raised as an issue by the Fire Service on a previous joint visit with NRW. I can see from the site plan, that this has not been addressed in the plan. Therefore, please provide further details on how the Operator would propose to overcome this issue in the FPMP, and how access would be achieved in an emergency.

The area in front of the offices has been designated for an area where the emergency services could use to park equipment/coordinate efforts, however this was also identified as an area that would not be suitable for this use by the FRS. Therefore, please provide further details in the FPMP.

The site plan should also include all types of combustible waste on site, including where the exempt green waste is stored, in pile 4, within the permitted area.

Probes/Automatic monitoring

The operator has stated that probes would be inserted in piles >4m high, as an alternative measure, with automatic temperature monitoring, with trigger levels being set to alert the Site Manager to undertake Hot Spot Actions, if certain temperatures were to be reached within certain timeframes. Probes would assist to detect and address any hot spots occurring in hours however, please expand on how the automatic monitoring system would assist during out of hours, such as:

- If the temperatures are hit out of hours, how/who will undertake the hot spot actions required?
- At what temperature would attendance be required?
- Who would be alerted, i.e., site manager, on-call plant operatives, FRS, sensitive receptors etc?
- How long would it take for them to respond and assess the situation on site, or would it be a case of potentially escalating the response and meeting the FRS on site to implement/co-ordinate the sites firefighting strategy?
- How would the off-site emergency pack be accessed? Where will it be located? Is it easy to access? i.e., a lockbox located at the entrance of the site for the emergency services or with on-site security staff?
- The sites main firefighting strategy is facilitated using plant equipment, therefore, how would on-call operatives be contacted? Who has the authority to request staff to attend site?
- 4.25 lists the on-site firefighting equipment. Please include in the FPMP who is trained to use them, the location of the equipment and keyholders (i.e., security).

Please refer to the information below, under ‘Prevent’, as the FPMP also requires more information regarding the probes.

Sensitive Receptors

Where contact details such as telephone numbers are not listed for nearby residents, an explanation of an effective plan included in the FPMP would be acceptable, detailing the most efficient way to contact them in the event of a fire.

Recirculation of firewater

This provision would not be considered as a guaranteed water supply, as it would depend on the quality of the water run-off and would be a decision for the respective Fire and Rescue Service, as this would generally be made on a case-by-case basis and the fire plan should reflect this.

Containment of firewater

I note, 4.40 states the site has an impermeable surface which would mean that the firewater would drain to the cattlegrid. I note, the condition of the impermeable surface is currently under investigation by the operator, following a site inspection on the 4th October 2021.

Alternative measures

Any alternative measures proposed, need to be targeted directly at the reasons for the standards outlined in the FPMP guidance, for use at the specified site, as no two sites are the same. Further information as to the alternative measures outlined is required, to overcome the issues outlined in this review of FPMP v4 (as amended 7th October 2021). As the alternative measures must demonstrate how they will allow the site to meet the FPP objectives, which are to:

- Prevent fire starting
- Prevent fire spreading
- Aim to extinguish within 4 hours.

Prevent

Alternative measures for **pile sizes** must be based upon evidence.

You acknowledge that the risk of self-heating is greater in smaller fractions and so you propose to leave the waste in larger fractions until it is processed to order, with only a small stockpile 4m high to be stored away from larger fractions, if required temporarily.

Height is considered the most sensitive dimension for self-heating to occur, and you propose to construct piles over 4m, with probes inserted to automatically monitor temperatures. Further clarification is required within the FPMP here, such as:

- How does the temperature probe work? i.e., does it monitor surface temperature?
- If so, there could be a differential between the internal and external temperature, therefore, how accurate would this be? Has this been considered?
- How would inserting the probe into a steel tube with ventilation holes effect the readings? How accurate will they be? Has this been considered when deciding the trigger point temperatures?
- In a stockpile 26m wide, how will the probes reach a depth of 13m, with a telescopic range of 10m?
- By inserting hollow steel tubes with ventilation holes containing temperatures probes into stockpiles >4m high, how would this risk be managed in the event of a fire on

site?
- How would this impact the firefighting strategy? i.e., Would they be removed before a stack is split?

To prevent localised ignition, the FPMP outlines waste acceptance procedures and that you are segregating the waste from other ignition sources, demonstrating good practice in the FPMP.

You acknowledge there is a risk of arson and as a preventative measure you have 24-hour, on-site security, at all times when the site is not operating, plus CCTV system with live streaming access and provision for motion activation, providing instant notifications in the event of unauthorised access and palisade fencing and landscaped areas to prevent unauthorised access. We require further clarification here, such as:

- Does the CCTV have thermal imaging capabilities, if so, please specify?
- How is the alarm raised in the event of an incident?
- 4.5 states you have on-call operatives who can attend site, in the event of an emergency? What is the procedure for initiating contact? Where are their details held?

Aim to extinguish within 4 hours

The requirement for 2000 litres, per minute for 3 hours for every 300m^3 is based on FRS statistics and assumes there are no other intervention measures.

You have acknowledged that recirculation of water may not be possible, as this would be a decision for the Fire and Rescue Service, to be made on a case-by-case basis.

Please clarify within the FPMP if the initial supply available is within 100m.

You have not provided the flow rate of the fire hydrants available and state that it is ‘probable’ that it could supply a fire appliance operating at full capacity, giving it an output of around 2000l/min. The FPMP requires more information here, such as:

- Please clarify within the FPMP if the fire hydrants available are BS750, and if they are maintained by the Fire and Rescue Service, DCWW or a nominated provider.

As a longer-term firefighting strategy, you have detailed an intervention to create fire breaks to ensure full stacks do not ignite. We require further clarification here, such as:

- How will the early detection and intervention work to ensure that a fire remains small?
- How will you ensure that there is easy access for the Fire and Rescue Service? I.e., Will on site security be able to facilitate access to site, on-call assistance and the emergency pack?
- What procedure is there to request on-call operatives? How will they be contacted? Within what timescale would they be on site, to assist the FRS by moving waste using plant machinery to break stacks, create fire breaks, isolate burning waste etc.?
- How will you ensure that the Fire & Rescue Service are able to fight the fire in relative safety?

Water requirement/containment

You acknowledge that the water requirement based on the pile sizing is not possible. There remains a deficit in the amount of water required in your calculation using wetting agent (which would be 10% of what would otherwise be required), however, there is a top-up capacity available. Further information is required here, such as:

- How will you ensure the 'top up' is available at a rate 2000 l/m, if you do not know the flow rate of the hydrant? The bore hole cannot provide this at 75 l/m.

You acknowledge that your ability to demonstrate firewater retention on site would be difficult (based on pile sizing), for the volume of water that would be required to extinguish a fire in the largest stack. Further clarification is required in the FPMP here, such:

- Demonstration of the sites ability to retain water for **worst case scenario**, such as:
- How many hours protection can the site offer in retaining fire water?
- When the site is reaching capacity, at what point would other measures be implemented to prevent fire water escaping site?
- What other measures would be implemented to prevent the fire water breaching the sites boundary?

The FPMP does demonstrate ways in which you will reduce the risk of self-combustion and how you would eliminate fire spread through the firefighting strategy, which may help to reduce the amount of water required.

You have ensured that a bowser and a fire engine are always available on site. We require further information in the FPMP, such as:

- What are the procedures for using the bowser/fire engine or tractor/trailer?
- Who is trained to use them? Keyholders?
- Where are they located? This would be useful on the site plan.
- Where would the water come from for the bowser and fire engine?
- How much water do they hold?
- Are the bowser and fire engine checked regularly to make sure they are full?
- If not, how long would they take to fill?
- What equipment does the fire engine contain?

You propose the use of **wetting agent** as an alternative measure to overcome the issue regarding water supply, to reduce the amount of water required. We require further clarification here within the FPMP to determine its suitability, such as:

- How will the wetting agent be added to the water?
- How is it diluted? what is the procedure?
- What equipment is required?
- How long will it take?
- Who will be responsible for this? Are they trained? On-call?
- Through using wetting agent, how would the operator remedy any potential short-term localised impact, if required?

Please demonstrate that consideration has been given to the time it will take to facilitate the use of wetting agent, and given that, consider how much stored water would have already been utilised to fight a fire in the largest stack, as the site has 155,000 litres on site, and would be used a rate of 2000 litres per minute. Therefore, if the operator wished to coordinate/control how the water supply is utilised, this information would be required in the plan.

We acknowledge the plan states there is a top-up capacity of 373,500 litres for the first 3 hours available via the hydrant and bore hole. However, further to the information already outlined above regarding this provision, please also include:

- How have you demonstrated that the flow rate would be sufficient in order to provide this top-up capacity?

Measures to reduce fire risk

The FPMP guidance stipulates calculations which can be used to determine suitable separation distances for various waste types.

You have provided separation distances within the FPMP. We require further clarification here. Please clarify within the FPMP how the specified separation distances are suitable. There is no evidence within the plan to suggest that there has been a calculation to determine the suitability of the specified separation distances. Have other enhanced alternative measures been considered to reduce the required separation distances, such as:

- Have bunkers/fire walls been considered?
- Have you performed your own fire engineering calculations?

Summary

Fire Prevention and Mitigation Plan (v4 as amended Oct 2021) fails to meet the standards required, failing to suitably demonstrate that the proposed management of wood waste will decrease the risks associated and potential impact, should a fire occur on site.

Please ensure any revised submissions address all issues raised and includes everything that ‘must’ be included in accordance with the guidance, without these, Natural Resources Wales are unable to consider any ‘alternative’ measures.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?
In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):

A: Permitted activities
- A1 Specified by permit

B: Infrastructure
- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management
- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management
- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions
- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity
- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting
- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency
- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response
Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice
You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line
If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?
If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards
We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.