

Compliance Assessment Report

Report ID:
CAR_NRW0031314

This form will report compliance with your permit as determined by an NRW officer

Site	Cross Hands EPR/BU8002IT	Permit Ref	BU8002IT		
Operator/Permit holder	Dawn Cross Hands (Dawn Meats UK)				
Regime	Installations				
Date of assessment	01/03/2017	Time in	N/A	Out	N/A
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	Annual Reporting				
Lead officer's name	Jenkins, Nicholas				
Accompanied by					
Recipient's name/position	Alison Trace/ EHS Manager	Date issued	03/03/2017		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
A1 - Infrastructure - Specified by permit	A	
E5 - Infrastructure - Waste	A	
G1 - Infrastructure - Monitoring of emissions and environment	A	
G4 - Infrastructure - Reporting and notification to Natural Resources Wales	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,
O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Annual Submissions

Dawn Meats submitted its annual returns 21 January 2016 and the following graphs represent how it has performed year on year since the permit was issued. The percentage change is based on the 2015 data submitted by Dawn Meats.

Waste - Total waste figures continue to fall (-11%) as each category shows a decrease with the largest fall in animal by product waste (-17%). Dawn advised that the fall in waste figures reflects the decrease in product.

Energy - Similarly to the waste, energy figures have decreased accordingly as product has decreased. The relationship with the production of cooked meat and gas is consistent with the correlation for years 2014 and 2015 i.e. the production of gas decreases with the volume of cooked meat. Both gas and electricity specific energy consumption has improved based on the total production value (decrease of 8% and 10% respectively). Dawn Meats are now operating under ISO50001 and explained that the review carried out was successful. It stated that the specific energy consumption targets for electricity and gas have been revised: 441KwH/production T and 1200KwH/cooked production T respectively. (2016 figures are 2000KwH/T electricity and 3258KwH/T for gas). If NRW figures are correct the aspirational figures appear to be significantly lower. Dawn has advised that it will provide a copy of the ISO50001 report.

Product - Total production has dropped by 14% with raw meat and cooked meat decreasing by similar values (17% and 16% respectively). Since the permit was issued there has been a relatively steady production level around 26,000T.

Total potable water - This category has seen this largest improvement on 2015 results by decreasing around 28% but this would have been expected based on the decrease in production. What isn't expected is the large increase of specific water consumption. The expectation is that it would remain relatively stable or improve as the Dawn Meats water efficiency plan drives improvement. The specific water consumption based on the total production has increased by 18% (from 3.38m³/T to 4m³/T). Dawn advised that it did not achieve its target of 3.29m³/T however it intends to reduce the target for 2017 as it expects that by reviewing a number of different projects it can achieve this objective. It has also committed to completing a waster efficiency audit in Q1 2017. We welcome this.

Recommendations

1. Dawn Meats to provide a copy of its ISO50001 report.
2. Dawn Meats to clarify its specific energy consumption based on the targets for 2017

[END]

EPR Compliance Assessment Report

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Operator/Permit holder	Dawn Cross Hands (Dawn Meats UK)	Date	01/03/2017

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition.

Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.