

17th May 2017

Mr Paul Gibson
Team Leader – Regulation South West
Natural Resources Wales
Llandarcy
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Ref. Environmental Permit : EPR/EP3034GS/V002

Dear Mr Gibson,

I write following our meeting in your offices on the 10th May 2017, and I would firstly like to thank you and Mr Baskerville for taking the time to discuss the Agency's concerns about our Carmarthen mill site outside of the formal enforcement regime.

Our Feeds Director Emyr Jones, and myself, fully appreciated the point you made concerning the poor compliance record the site has in regard to the existing Permit, particularly following the most recent incident on the 21st April 2017. We intend to ensure that appropriate remedial actions are taken to address this situation, both in terms of the physical management of the site in line with the Permit requirements, and also to the approach taken with regard to the procedures put in place to ensure and confirm that such physical management practises are being maintained. In relation to these two broad categories of committed actions, I would like to add the following comments concerning immediate action plans :

Physical site management :

- The commitment to pursue the installation of a bespoke waste water treatment plant to be ordered immediately upon receipt of the revised Permit requirement feedback.
- We have commissioned Mr Keith Owen of ADAS to conduct an investigative survey of the site, with a specific view of highlighting any as yet un-identified sources or risks of emissions or releases to the environment. This action will also provide incident investigation training for those staff with contact responsibilities.
- The circulation of a new communication / contact protocol, identifying a number of levels of contact alternatives for the site.
- Increased senior management vigilance of the general site management and control procedures during the lead time period prior to installation of the new water treatment plant.
- A communication program to improve the environmental awareness of all staff on site, with a view to embedding the concern in the "culture" of the business.

Procedural / Confirmatory improvements :

- The appointment of named individuals to assume the internal audit responsibilities of the physical management obligations. (Sally Davies &

Catherine Faulkner at HO, and a new appointment locally in Carmarthen expected in position from July 2017).

- The ongoing development of the existing draft Environment Management System documents to accommodate actual current activities and any necessary amendments as a result of the anticipated Permit amendment approval.

With regard to the development of the EMS procedures, I was grateful for the guidance and advice you provided, particularly regarding the "fit for purpose" approach, which should seek to avoid inadvertent breaches. We will also endeavour to identify associated organisations, who may be prepared to share their experiences and processes to help us develop our own system.

In conclusion, I would like to emphasise the point I tried to make in our meeting, that the shortcomings we have demonstrated have most certainly not been the result of an intentional or wilful avoidance of the environmental commitments that our Board most definitely take seriously. With the benefit of our meeting, I recognise the nature of your comments regarding our need to mature and modernise the management processes used in this aspect of our business. I intend to do my best to ensure this occurs.

Yours sincerely



B.P. Roberts
Finance Director & Company Secretary
Wynnstay Group PLC