

Ein cyf/Our ref:

Eich cyf/Your ref:

Maes Newydd
Llandarcy
Neath Port Talbot
SA10 6JQ

Mr G Hunt
Cenin Limited
The Research Centre
Parc Stormy
Stormydown
Bridgend
CF33 4RS

15 April 2014

Dear Gary,

Animal Bedding

Thank you for the additional information provided regarding your proposals to manufacture (using the permitted process) a substitute for other proprietary animal bedding products. This was supplied following an initial meeting with myself and Chris Thomas.

Although you are confident that the bedding is a suitable alternative to other bedding materials, we strongly advise you obtain further documentary evidence to demonstrate :

- The 'raw materials' have been converted into a distinct and marketable product;
- the processed substance can be used in exactly the same way as a non-waste virgin material; and
- the processed substance can be stored and used with no worse; and environmental effects than the ordinary material you are replacing.

In order obtain this some of this additional information we understand that you propose to limit initial usage of the bedding product on a small number of farms in Carmarthenshire and Bridgend areas.

We strongly recommend that as part of your initial deployment of bedding material you ensure you have a methodology in place to collate further evidence to demonstrate its effectiveness, its safety to animals and potential beneficial use as a soil improver.

Any method statement / methodology should includes the following information as a minimum:

1. site specific farm details and agreed fields used for spreading of used bedding material.
2. Baseline soil samples for the land on which the material will be spread.
3. Specification / chemical composition of the Cenin material. This should include pH and potentially toxic elements (PTEs) including heavy metals. Maximum concentrations

should be provided if possible. PTE definitions are outlined on page 5 of the [Sewage Sludge Code of Practice \(2nd Edition\)](#).

4. Details of how the material is blended to ensure the correct composition (where does blending take place, how is it controlled, how are the correct compositions determined?)
5. Confirmation that a veterinary professional monitors the health of the livestock on chosen farms, while an BASIS FACTS qualified agronomist monitors the impacts on receiving soil bank and wider environment, and both are prepared to sign off their findings on a professional basis.
6. Confirmation that officers of NRW are made aware of all current agricultural uses of the product ongoing and the latest findings to date
7. Confirmation that the trial is subject to a yearly review and that all records are kept available to NRW for 5 years.

The use of the bedding material is not subject to the regulatory control as part of your EPR permit compliance. Chris Thomas, one of our officers who specialises in agriculture, has agreed to be your point of contact should you have any queries. Future correspondence or discussion regarding the use of the material as animal bedding should now be directed to:

Email: chris.thomas@naturalresourceswales.gov.uk.
Direct line: 01792 325654.

Please note, as with all activities, we reserve the right to proceed with both regulatory and/or enforcement action should an actual or potential negative environmental impact be detected. Chris would therefore like to be regularly updated on the work and provided with full access of the monitoring and results should they be requested to ensure we identify any potential issues at the earliest opportunity.

If you have any questions about this letter, please contact me at the Llandarcy office.

Regards,



Paul Gibson
PPC Team Leader

Direct Line: 01792 325537