

Compliance Assessment Report

Report ID:
CAR_NRW0026931

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

Site	The Creamery	Permit Ref	WP3231NB		
Operator/Permit holder	Dairy Partners (Cymru Wales) Limited				
Regime	Installations				
Date of assessment	13/07/2016	Time in	10:00	Out	15:00
Assessment type	Audit				
Parts of the permit assessed	1 Management; 2 Operations; 3 Emissions and Monitoring; 4 Information				
Lead officer's name	Cowie, Douglas				
Accompanied by	Gibson, Paul				
Recipient's name/position	Len Stevens/ Safety, Health & Environment Manager	Date issued	07/03/2017		

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
C1 - General Management - Staff competency/training	C2	2.3.1 Management
C2 - General Management - Management system and operating procedures	C2	1.3.1 Overarching management condition
D2 - Incident Management - Accidents, emergency and incident planning	C2	2.8.1 Accident prevention and control

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	3	Total compliance score (see section 5 for scoring scheme)	93
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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

Site description

Dairy Partners (Cymru Wales) Ltd operates a milk processing and cheese production facility at The Creamery, Aber-arad, Newcastle Emlyn. The company is a subsidiary of Dairy Partners Ltd, a family-owned dairy company based in Gloucestershire which supplies UK and overseas markets. The facility is permitted as an installation under Section 6.8 (The Treatment of Animal and Vegetable Matter and Food Industries) of the Environmental Permitting Regulations (EPR).

Milk supplied by local farms is pasteurised and processed at the installation to produce mozzarella cheese blocks and a range of other cheese and cream products. The installation operates its own on-site effluent treatment plant (ETP) which receives and treats foul water and effluent from the installation. The ETP is permitted as a Section 5.4 (Waste Treatment) activity and the final treated effluent is discharged to the Afon Teifi.

Purpose of visit/assessment

This was a planned visit to the Dairy Partners (Cymru Wales) facility. The following matters were covered during our visit:

- Introductions and site operations update
- March 2016 oil pollution incident (WIRS ref. 1600629)
- ETP sludge management and waste contingency planning
- Environmental Management System (EMS)
- Other matters

Person(s) present

Dairy Partners

Robert Peel
Johnny Thomas
Len Stevens

NRW

Doug Cowie
Paul Gibson

Introductions and site operations update

Robert Peel was introduced as one of the directors of Dairy Partners (Cymru Wales) Ltd. Robert provided an overview of planned developments at The Creamery and the site's role in the context of the wider Dairy Partners business. There was recognition by the operator that as the site has grown in recent years and production has increased since Dairy Partners took over operations, the potential for issues had also increased. The Creamery represents an important part of Dairy Partners' business strategy and Dairy Partners will be looking to work with NRW to improve permit compliance and environmental performance. NRW recognises that as well as employing around 80 staff directly, the site receives milk from a considerable number of suppliers in South, West and Mid Wales and is an important part of the local economy.

There are a number of projects planned and ongoing which will see changes being made to the site layout and infrastructure:

1. Around £2.5m investment in a new string cheese production line
2. Diversifying the range of products made at Newcastle Emlyn to take advantage of new markets (domestic and overseas)
3. Energy efficiency improvements and upgrades including LNG-fired heating and new chiller units.
4. A new milk reception area which will involve demolition of some existing older structures and better vehicle access

Key challenges identified include:

- the amount of direct supply and wholesale milk available to Dairy Partners
- the treatment capacity of the on-site ETP
- the age and layout of the existing legacy dairy buildings

It is important that investment in key site infrastructure such as the ETP keeps pace with the production increases being planned by the company. Early dialogue with NRW is encouraged to ensure Dairy Partners can continue to operate sustainably and in accordance with the site permit.

A specific update was provided on the LNG project which is intended to secure a reliable and convenient energy supply for the factory. Hazardous Substances Consent and planning permission have been applied for. A third party gas supplier is assisting Dairy Partners with the project design. Liaison has already taken place with the Health & Safety Executive (HSE) regarding storage volumes which will be around 25 tonnes. The operator is reminded that an environmental permit variation will be necessary before the LNG system can be commissioned and brought online.

The operator may wish to combine multiple changes under a single permit variation application to make it more cost-effective. NRW can also consolidate and convert the permit to a modern format when these changes are applied for. Modern permits have the advantages of:

- up-to-date permit conditions which reflect current regulatory approaches and policies
- allowing consolidation of multiple permit documents
- clearer links to published guidance
- rationalising and minimising duplication of environmental monitoring

Guidance on how to apply for a permit variation has been provided by the regulating officer.

March 2016 oil pollution incident

On 3 March 2016 NRW officers attended an oil pollution incident which affected the Afon Teifi and its tributary, the Afon Arad. Our attending officers traced the source of the pollution to a pipe inside the permit boundary of the installation which was discharging oily water into the Afon Arad. The operator has notified us that there was a spillage of fuel during a delivery on 03/03/16 during the hours leading up to the incident. We have conducted follow-up investigations and examination of the installation's oil storage compound has revealed it to be in poor condition with an associated risk of causing pollution.

During this visit we confirmed that Natural Resources Wales is considering taking enforcement action against Dairy Partners (Cymru Wales) Ltd as a result of the pollution incident on 3 March 2016. Further correspondence in relation to this matter will follow as our investigation is concluded. NRW's enforcement decision will be communicated in writing to Dairy Partners (Cymru Wales) Ltd.

During our audit the operator provided an update on site developments since NRW officers last

visited the site on 10 March 2016:

1. The company intends to decommission the oil storage compound and would like to remove the majority of the brick bund walls (leaving a 'dwarf' wall) around the bund floor. The tanks are to be cut up in situ and removed by a specialist contractor.
2. The remaining fuel in the central tank has been used up and a new integrally-bunded tank (36,000litre capacity) is currently used to store heating oil for the factory boilers.
3. Some ancillary pipework in and around the bund is being removed.
4. A small concrete ring chamber is to be created at the interception trench near the Afon Arad to help capture any residual oil at this location.

Since our visit the concrete ring chamber has been constructed and appears to be functioning well. The three oil tanks have been dismantled and removed from site. Further inspection of the oil storage compound was carried out by the inspecting officer on 10 November 2016 as part of our ongoing pollution incident investigation. This inspection revealed deficiencies with the bund indicating a loss of secondary containment.

In the context of this incident, compliance with the following permit conditions has been assessed and audited in this report:

1.3 Overarching Management Condition

- 1.3.1 Without prejudice to the other conditions of this Permit, the Operator shall implement and maintain a management system, organisational structure and allocate resources that are sufficient to achieve compliance with the limits and conditions of this Permit.

In CAR 6130 we emphasised the importance of a robust, fully auditable and preferably externally recognised and certified site Environmental Management System (EMS) as the foundation on which compliance with all other permit conditions is achieved. We aimed to clearly set out the key elements of a site EMS so the operator could be clear as to the standard and level of certification required.

The inspecting officers were shown documents and procedures from what appeared to be Saputo Cheese's legacy EMS. The information submitted was fragmentary and the operator could not show evidence of a single overarching EMS document or electronic system that adequately covered the current site operations. Some of the working documents appeared to be quite old e.g. Saputo Accident Plan submitted in response to Improvement Condition IC2 (01/04/2006).

The site's present EMS is not certified to an externally recognised standard e.g. ISO14001, but it is recognised that the operator is preparing a plan and has started developing an in-house EMS which is equivalent in scope to an externally recognised standard. This will involve 'rebadging' some legacy EMS documents, but also rationalisation and modification of others where appropriate.

We asked to see any procedures and records in relation to fuel deliveries and transfers. Although the operator believed a procedure existed, a copy was not available at the time of inspection. We could not assess if such a procedure was being followed or if there was any requirement to supervise and record fuel deliveries accurately. This is symptomatic of the absence of a coherent and robust site EMS which would require such procedures to be written, implemented and periodically audited by the operator, and fuel deliveries to be recorded accurately.

NRW is concerned that the weakness of the operator's current EMS presents a high risk of environmental issues and permit non-compliance. To address this vulnerability, the operator must prioritise the adoption of an EMS which is effective and proportionate to activities at The Creamery. **One CCS Category 2 score** has been recorded for non-compliance with Condition

1.3.1.

Since this audit the operator has submitted a compliance plan to NRW outlining how it will implement an EMS for the installation. NRW can allow **6 months** from the issue date of this report – CAR_NRW0026931 – for this plan to be implemented and permit compliance to be achieved. Further CCS scores recorded against compliance criterion C2 can be suspended during this period, but compliance with Condition 1.3.1 must be achieved by **31 August 2017**.

2.3 Management

2.3.1 A copy of this Permit and those parts of the application referred to in this Permit shall be available, at all times, for reference by all staff carrying out work subject to the requirements of the Permit.

This permit condition relates to the provision of: i) a copy of the permit; and ii) any application documents referred to in the permit for reference by site personnel who carry out work subject to the permit requirements. The operator must make these documents available on site at all times to those personnel who need them.

At the time of the oil pollution incident on 3 March 2016, NRW is not satisfied that the installation's permit, permit variations and other key documents were made available to site personnel. The inspecting officer needed to remind the operator of the need to notify NRW of the March pollution incident without delay and follow up this notification with written confirmation using the template in Schedule 1 of the permit. Furthermore the regulating officer needed to supply copies of the permit documents and variations by email on 17 May 2016 after the operator confirmed none were available at the site or in the operator's electronic files.

It appears that the present SHE Manager has inherited a difficult situation in terms of site records and filing. The operator confirmed that problems have been encountered when searching for previous records and correspondence. Also there does not appear to have been any transition or handover from the previous SHE Manager. While we understand this makes things more difficult and we will work with the SHE Manager as site records are updated, this is not an acceptable explanation for the absence of documents as fundamental as the installation's environmental permit.

We believe this failure to make permit documents available to key site personnel is symptomatic of the deficient site EMS as described in the previous section of this report. It is vital that Dairy Partners ensures these documents are available at all times and that key site personnel familiarise themselves with the permit and the conditions it contains. **One CCS Category 2 score** has been recorded for non-compliance with Condition 2.3.1.

We expect the operator to demonstrate compliance with this condition by the deadline specified in this report. A site inspection will be undertaken to verify the availability of permit documents.

2.8 Accident prevention and control

2.8.1 The Operator shall maintain and implement when necessary the accident management plan submitted or described in Section 2.8 of the Application. The plan shall be reviewed at least every 2 years or as soon as practicable after an accident, whichever is the earlier, and the Agency notified of the results of the review within 2 months of its completion.

The operator's Accident Plan was originally written for Saputo Cheese (UK) Ltd who previously operated The Creamery. The copy available at the time of this audit was compiled and submitted in response to IC2 of the permit (01/04/2006). No updates or revised versions of this plan were presented for inspection.

NRW does not have confidence that the operator's Accident Plan accurately reflects the current operations at The Creamery. The plan must be reviewed in line with the requirements of Condition 2.8.1 and a copy submitted to NRW for comment.

Section 5.0 of the Accident Plan states that the following measures are taken to minimise risk:

- All bunds are regularly checked to ensure their capacity and integrity
- Tanks are checked to ensure they have sufficient capacity prior to any transfer of liquids

The operator's maintenance systems and procedures were examined to determine if these elements of the Accident Plan were being followed in respect of the oil storage compound. An IT system is in place which records reactive and preventative maintenance of plant and equipment. This system is checked twice daily and tasks are allocated manually by site engineers. The system 'auto-prompts' if tasks have expired or need urgent completion.

The operator's maintenance system does not extend to the bund surrounding the oil tanks or the valves and pipework at the filling point. No records of maintenance checks or repairs to these assets were available for inspection.

An inspection of the bund on 10 November 2016 determined that its integrity was compromised. Damaged masonry and evidence of bund wall and floor joint separation were found at the rear of the bund (nearest the boiler house).

The sole working valve and dial gauge at the filling point appears to be in poor condition and it is not clear if this is functioning properly. This presents an increased risk of overfilling the oil tank which was confirmed to have occurred on the morning of the 3 March 2016 incident.

NRW therefore believes the operator's Accident Plan is not being followed in respect of these assets and consequently they have not been maintained adequately. Once again we believe this is symptomatic of the absence of a wider certified site EMS which would require the Accident Plan to be written, implemented and periodically audited by the operator, and the scope of the operator's maintenance to extend to such infrastructure.

One CCS Category 2 score has been recorded for non-compliance with Condition 2.8.1. We expect the operator to submit an updated and revised Accident Plan for NRW comment by the deadline specified in this report. All operational fuel storage assets at the installation must be added to the operator's maintenance system and a programme of regular checks implemented and recorded. This will be reviewed by NRW at a future compliance inspection.

ETP sludge management and waste contingency planning

A review of the operator's ETP sludge management and recovery and the waste contingency planning arrangements for the site was undertaken.

The operator has applied to NRW for a mobile plant deployment under permit EPR/VB3997TH on agricultural land near Henllan, Carmarthenshire. At the time of inspection this application was still under assessment. Following our visit the operator received confirmation that deployment could proceed on 11/08/2016. This deployment has improved the situation since our last inspection but should not be relied upon to provide a sole waste recovery option for Dairy Partners. **The current agreed deployment is valid until 10 August 2017.**

A proportion of the ETP sludge is being recovered at an Anaerobic Digestion (AD) facility near Cardigan. This option may help build resilience in the operator's waste contingency planning so long as the AD facility remains operational.

The operator is encouraged to seek out additional deployment possibilities for the ETP sludge and increase the agricultural land bank available for spreading. Applying sludge to land owned by supplier farms may be an option given that communication links with these farmers have already been established by the company's Farm Supplier Manager. In considering this option the

company should satisfy itself that there are no self-imposed quality assurance constraints on milk produced from grassland where ETP sludge has been applied.

Investing time in waste contingency planning now may help avoid difficult situations and decisions later on. Pages 22-23 of How to Comply with your environmental permit and TGN EPR 8.01 discuss contingency plans. The published Environment Agency guidance 'Contingency plans for waste storage' previously shared with the operator is also relevant.

<http://naturalresources.wales/apply-for-a-permit/environmental-permitting-regulations-guidance/guidance-to-help-you-comply-with-your-environmental-permit/?lang=en>

Finally, NRW has received complaints of unauthorised waste disposal on farmland near Drefach-Felindre, Carmarthenshire. The information we have received alleges that the waste is emanating from The Creamery. NRW has not substantiated these complaints but the operator is reminded that the Duty of Care for Waste applies to all waste transfers from the installation. NRW may inspect waste transfer documents and records at any time to verify that the installation's ETP sludge is being directed to an appropriately permitted facility or activity.

<http://www.rightwasterightplace.com/>

Environmental Management System (EMS)

The action needed in respect of the operator's EMS is discussed earlier in this report. Dairy Partners has indicated that an in-house EMS for The Creamery is being developed which will be equivalent in scope to the externally recognised standard ISO 14001. This approach is reflected in its action plan.

Some of the other interventions that have been commenced include:

- Update of Company Environmental Policy Statement
- Development of a company Environmental Handbook
- Review of site environmental risk assessment
- Introduction of a staff training matrix

It is acceptable to have an in-house EMS which you design yourself, or choose to join a formal certified scheme e.g. ISO 14001 or EMAS. You may choose to have your EMS certified or inspected by independent auditors. The Operator Performance Risk Appraisal (OPRA) scheme, which NRW currently uses to allocate regulatory resources and set permit charges, recognises independently certified EMS schemes such as ISO 14001 and EMAS as best practice and this can be reflected through a lower overall OPRA score and a permit subsistence charge discount. However externally recognised and certified schemes are not mandatory for site operators.

An effective EMS should help the operator to keep abreast of regulatory changes and be 'ahead of the game' in terms of the site's environmental impact. An EMS is a clear way of demonstrating environmental responsibility and may help the company's relations with its suppliers, customers and neighbours.

An Environmental Management Toolkit is available on NRW's website which may assist the operator in developing an EMS for the installation. The 'General Version Industry' toolkit may be the most relevant to Dairy Partners' operations at Aber-arad.

<http://naturalresources.wales/apply-for-a-permit/environmental-permitting-regulations-guidance/environment-management-system/?lang=en>

Other matters

The site changes described earlier in this report will be discussed in more detail at the next site inspection. The operator is encouraged to be realistic in its project planning to allow for the necessary permit variation(s) to be determined.

The annual reporting requirements for E-PRTR (formerly Pollution Inventory) data were discussed. The operator needs to report any relevant **releases to air, releases to water** and also **waste transfer data** for sludge movements from the on-site ETP. In the UK, Defra has provided an online portal for this purpose:

<http://prtr.defra.gov.uk/data-entry-system/>

Defra's online reporting system is normally available from early February onwards and the deadline for submitting data is normally 31 March. Guidance on the use of the reporting website can be found on the reporting system login page.

NRW issues a notice on an annual basis to all operators in Wales who are required to report pollutant releases under the E-PRTR. This notice contains a list of all the individual reportable substances for air, water and wastewater. Substances such as metals, nitrogen and phosphorus would be relevant when reporting releases to water. Operators are encouraged to submit values for releases below the E-PRTR reporting threshold if they have the data.

The next round of E-PRTR notices (for 2016 pollutant data) is due to be circulated in January 2017. The operator should contact the inspecting officer in the event of any queries with next year's reporting requirements.

Conclusions

Further correspondence in relation to the oil pollution incident on 3 March 2016 will follow as our investigation is concluded. NRW's enforcement decision will be communicated in writing to Dairy Partners (Cymru Wales) Ltd.

Our audit of the operator's EMS, Accident Plan and maintenance system has found significant permit compliance issues. **Three CCS Category 2 scores** have been issued for non-compliance with Conditions 1.3.1, 2.3.1 and 2.8.1 of the permit.

NRW is concerned that the weakness of the operator's current EMS presents a high risk of environmental issues and permit non-compliance. To address this vulnerability, the operator must prioritise the adoption of an EMS which is effective and proportionate to activities at The Creamery. NRW can allow **6 months** from the issue date of CAR_NRW0026931 for the operator's **compliance plan** to be implemented.

Is vital that Dairy Partners ensures that permit documents are available at all times and that key site personnel familiarise themselves with the permit and the conditions it contains. We expect the operator to demonstrate compliance with condition 2.3.1 by the deadline specified in this report. A site inspection will be undertaken to verify the availability of permit documents.

We expect the operator to submit an updated and revised Accident Plan for NRW comment by the deadline specified in this report. All operational fuel storage assets at the installation must be added to the operator's maintenance system and a programme of regular checks implemented and recorded. This will be reviewed by NRW at a future compliance inspection.

It is critical that investment in key site infrastructure such as the ETP keeps pace with the production increases being planned by the company. Early dialogue with NRW is encouraged to ensure Dairy Partners can continue to operate sustainably and in accordance with the site permit. The operator is reminded that an environmental permit variation will be necessary before the LNG system can be commissioned and brought online. The operator is encouraged to be realistic in its project planning to allow for the necessary permit variation(s) to be determined.

The existing landspreading deployment near Henllan should not be relied upon to provide a sole waste recovery option for Dairy Partners. Investing time in waste contingency planning now may help avoid difficult situations and decisions later on. The operator is encouraged to seek out additional deployment possibilities for the ETP sludge and increase the agricultural land bank

available for spreading.

The operator should contact the inspecting officer in the event of any queries with the annual E-PRTR reporting requirements.

[ENDS]

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0026931**

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

Site	The Creamery	Permit Ref	WP3231NB
Operator/Permit holder	Dairy Partners (Cymru Wales) Limited	Date	13/07/2016

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.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

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			
D2	C2	Operator must review and update Accident Plan. All operational fuel storage assets must be added to the operator's maintenance system and a programme of regular checks implemented and recorded.	31/05/2017
C1	C2	NRW has provided copies of permit, permit variations and application documents. Key staff must familiarise themselves with permit requirements.	31/03/2017
C2	C2	The operator must adopt an effective and proportionate EMS for the installation within 6 months of this report.	31/08/2017

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.