| Cyfoeth Naturiol Cymru / Natural Resources Wales | **EPR Compliance Assessment Report** | Report ID: AP3633HT/0225867 |
|---|---|---|

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

| | | | | | | |
|---|---|---|---|---|---|---|
| Site | SANDYCROFT POULTRY PROCESSING | | | Permit Ref | AP3633HT | |
| Operator/ Permit holder | WW&E (Wales And West England) Limited | | | | | |
| Date | 14/11/2014 | | | Time in | 09:30 | Out 16:30 |
| What parts of the permit were assessed | EMS Audit | | | | | |
| Assessment | Audit | EPR Activity: | Installation X | Waste Op | Water Discharge | |
| Recipient's name/position | Steve Van Der Keift | | | | | |
| Officer's name | Matthew Kelk, Stuart Ross | | | Date issued | 12/12/2014 | |

## Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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** | | | | **Condition(s) breached** |
|---|---|---|---|---|
| **a)** Permitted activities | **1.** Specified by permit | N | | |
| **b)** Infrastructure | **1.** Engineering for prevention & control of pollution | A | | |
| | **2.** Closure & decommissioning | N | | |
| | **3.** Site drainage engineering (clean & foul) | A | | |
| | **4.** Containment of stored materials | A | | |
| | **5.** Plant and equipment | A | | |
| **c)** General management | **1.** Staff competency/ training | A | | |
| | **2.** Management system & operating procedures | A | | |
| | **3.** Materials acceptance | N | | |
| | **4.** Storage handling, labelling, segregation | N | | |
| **d)** Incident management | **1.** Site security | N | | |
| | **2.** Accident, emergency & incident planning | A | | |
| **e)** Emissions | **1.** Air | A | | |
| | **2.** Land & Groundwater | N | | |
| | **3.** Surface water | N | | |
| | **4.** Sewer | A | | |
| | **5.** Waste | A | | |
| **f)** Amenity | **1.** Odour | A | | |
| | **2.** Noise | N | | |
| | **3.** Dust/fibres/particulates | N | | |
| | **4.** Pests, birds & scavengers | N | | |
| | **5.** Deposits on road | N | | |
| **g)** Monitoring and records, maintenance and reporting | **1.** Monitoring of emissions & environment | A | | |
| | **2.** Records of activity, site diary, journal & events | N | | |
| | **3.** Maintenance records | A | | |
| | **4.** Reporting & notification | A | | |
| **h)** Resource efficiency | **1.** Efficient use of raw materials | N | | |
| | **2.** Energy | N | | |

**KEY**: **C1, C2, C3, C4** = CCS breach category ( *** suspended scores are marked with an asterisk),**
**A** = Assessed (no evidence of non-compliance), **N** = Not assessed, **NA** = Not Applicable, **O** = Ongoing non-compliance – not scored

| **Number of breaches recorded** | 0 | **Total compliance score** (see section 5 for scoring scheme) | 0 |
|---|---|---|---|

**If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response**

FOR PUBLIC REGISTER MK 13/1/2015
ADDED TO PUBLIC REGISTER

**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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

## Environmental Management System

*Permit condition 1.3:- Without prejudice to the other condition 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.*

### Environmental Policy

The site has a comprehensive environmental management system (EMS) which is tailored to the sites needs. At present the site is not accredited to a certified management system, the aim is to be certified to BS8555 (Green Dragon in Wales, Groundworks) in the near future.

The site environmental policy was reviewed and makes a commitment to the main impacts from the site. The EMS policy was last reviewed on the 23/1/2014 by site OHSE manager and endorsed by the site manager. Policy appeared fit for purpose.

As the site has been recently taken over by 2 Sisters Food Group (2SFG), the drive will be to incorporate 2SFG corporate policies and procedures into the EMS over the next year.

### Significant Aspects

OHSE manager on site has compiled a full aspects register of all the possible environmental impacts from the operation of the abattoir.

Approximately ten significant aspects have been identified; these aspects have been taken from the main aspects register. Full aspects register does not use a scoring system to identify significant aspects.
Significant aspects identified by OSHE Managers experience of operations on site. Scoring system has been used to rank the ten significant aspects.

Legal register was shown and identified all environmental legislation relevant to the plant.

### Recommendation

As discussed during the audit a scoring system should be used to identify significant aspects from the full aspects register rather than relying solely on operator experience to identify key aspects.

The legislation register identifies Environmental Protection Act 1990 (statutory nuisance) as key legislation in relation to noise. It should be noted that the regulation of noise is covered by conditions within your environmental permit and the aforementioned legislation will not apply to site.

Objectives

Several documents were produced showing objectives set for the site:-

An action tracker indicating local objectives set, e.g. water consumption, general waste, noise, AD plant, improvements to scrubber, offal screen and feather press.

An annual review document with specific objectives with targets to be met by site, e.g. water consumption, energy, fuel and audit results. These objectives are reviewed monthly.

Main objectives are reviewed on a weekly basis at managerial level; these are listed on a white board in the meeting room so that progress can be reviewed regularly.

Recommendation

Link live action tracker with annual review to show targets met on site.

Procedures

Procedures are signed off on the paper copy and then held on the electronic system. These are split between engineering and environment departments.

The following procedures were audited during the inspection:-
Scald abatement,
Blood transfer,
DAF plant operation,
Hygiene Cleanliness

- Yard cleaning,
- Gantry cleaning,

All procedures appeared fit for purpose albeit some procedures did not appear to have been updated on the hardcopies of the procedural sheets kept on file even though they had been updated according to site.

Recommendation

Document control - procedures should include the most current review date to ensure adequate tracking and regular reviews. Documents should be reviewed at least annually.

Emergency management

Procedures with regards to emergency management were assessed.

A 'battle box' is kept within security/reception containing site plans, drainage plans etc, held for emergencies services to access quickly.

The site has a comprehensive business continuity plan in place, this details plans if various parts of the plant are adversely affected and what continuation plans are in place to keep the plant running.

Site has an emergency response plan which details response plans, drainage plans, general building layout, access for emergency services.

Emergencies are categorised into internal and external emergencies, emergency plans are audited by insurers annually.

Site drainage plan were audited and discussions were held around containment of liquids if a failure of the main bulk tanks failed, containment appeared fit for purpose.

Change management

Questions were asked how environmental impacts were assessed when significant changes are made on site. These are generally equipment based and pre audit meetings are held. Weekly meetings are held by top management as to what projects are coming in. NRW are informed at early stage of the projects, so that we can input.

*Permit*

*Permit Condition 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.*

A paper copy of the permit was available on file during the audit, a copy is also held on the electronic system. There are several variations to the permit which are available electronically but were not held with the paper copy of the file.

Recommendation

Variations to the permit should be made available to all staff.

*Permit Condition 2.3.8:- The operator shall record and investigate complaints concerning the Permitted Installation's effects or alleged effects on the environment. The record shall give the date and nature of complaint, time of complaint, name of complaint (if given), a summary of any investigation and the results of such investigation and any actions taken.*

Complaints/Incidents

OHSE Manager and Engineering manager investigates all incidents that require notification to NRW.

Discussions were held regarding investigating notifiable incidents when the above staff are not on site.
The above staff are permanently on call when off site. Concerns were raised how notifiable incidents would be reported if the above staff were unavailable.

Complaints reported to NRW by members of the public are forwarded to site security to be logged and then a member of the primary team will investigate. Primary team will then report if a significant issue found.

Recommendation

Include a cascade system to investigate and report notifiable incidents if on call staff are unavailable.

To include a flow chart for primary staff investigating incidents to inform of steps to take if issues found with infrastructure/abatement equipment.

Concerns that primary staff are investigating odour incidents and that these staff are desensitised to odour due to working in an odourous atmosphere on a daily basis. Use non factory staff to investigate odour incidents.

Training

*Permit Condition 2.3.2:- The Permitted installation shall be supervised by staff who are suitably trained and fully conversant with the requirements of this Permit.*
*Permit Condition 2.3.3:- All staff shall be fully conversant with those aspects of the Permit conditions which are relevant to their duties and shall be provided with adequate professional technical development and training and written operating instructions to enable them to carry out their duties.*
*Permit Condition 2.3.4:- The operator shall maintain a record of the skills and training requirements for all staff whose tasks in relation to the permitted installation may have an impact on the environment and shall keep records of all relevant training.*

All staff are given a basic induction upon starting at the site.

In general maintenance staff have duties on site that could have any environmental impact. Maintenance staff are trained on an annual basis in all relevant procedures, such as operation of the main chemical scrubber to control odour on site.

Engineering Manager showed a training matrix of all staff training, the matrix flags up where training is due to for each member of staff on various procedures across the plant.

OHSE Manager run through the review process of oprational procedures and further training on procedures is carried out if the audit flags up any failings in the procedures.

The site has specific trainer, records and examples of specific training was not available on the day.
Health and Safety toolbox talks are carried out regularly. OSHE Manager mentioned that it would be useful to instigate environmental toolbox.

The training of contactors was discussed. Records of training are kept with the engineering department. Training for contractors is refreshed every 6 months.

OSHE Manager was quizzed on whether site staff check on contractors during contracted work. Permit to work system in place. Engineers check on contractors every two hours and extra checks are carried out if this is hot work. A method statement is given by contractors so environmental risks are identified before contractors come on site and gaps in training can be identified.

Maintenance

*Permit Condition 2.3.5:- All plant and equipment used in operating the Permitted Installation, the failure of which could lead to an adverse impact on the environment, shall be maintained in good operating condition.*
*Permit Condition 2.3.6:- The operator shall maintain a record of relevant plant and equipment covered by condition 2.3.5 and for such equipment:-*

- *Permit condition 2.3.6.1:- A written or electronic maintenance programme; and*
- *Permit condition 2.3.6.2:- Records of its maintenance.*

An audit of the maintenance department was carried out, maintenance staff were interviewed.

Discussions were held regarding maintenance of the scald scrubber, from installation the scrubber is held under contract with Parsons Engineering for 5 years of which maintenance checks are undertaken every 3 months. Engineering reports were shown for this. 2SFG maintenance team undertake preventative maintenance (PM) checks daily on the scrubber to ensure that it is operating under optimum conditions to remove odour. Reports were shown for the daily checks.
If faults are found on the scrubber these are logged on a computerised maintenance system and flagged.

The effluent treatment plant operator carries out PM checks on the blood scrubber, these are daily, and reports of these checks were made available.

6 monthly checks are carried out by maintenance team and these are flagged up on the team's computerised system on the blood tank scrubber.
During the site inspection bunds surrounding tanks holding cleaning fluid were partially full of water. This initiated discussions regarding inspection of bunds and what the PM schedule for this was. At present this is carried out on a monthly basis. There were concerns that in the interim period the integrity of the bunds may be compromised or tanks may have leaked into the bunds. NRW requested that bund inspection were increased.

Tank integrity testing – discussions were held surrounding the integrity of tanks on site, blood tanks have been replaced with stainless steel versions. Effluent tank has been recoated. A present there are no procedures in place to test tanks on site.

Recommendation

It was agreed with the Engineering Manager that bund inspections would be increased to weekly.

Agreed solenoid/ drain down checks to be made on blood scrubber, update procedures.

Agreed with site engineering manager that tank integrity testing programme would be reinstated and that maintenance procedures should be introduced to reflect this change.

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| Site | SANDYCROFT POULTRY PROCESSING | Permit | AP3633HT |
| Operator/ Permit | WW&E (Wales And West England) Limited | Date | 14/11/2014 |

| Section 3- Enforcement Response | Only one of the boxes below should be ticked |
|---|---|
| You must take immediate action to rectify any non-compliance and prevent repetition.<br>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. | |
| Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed. | |
| 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. | |
| We will now consider what enforcement action is appropriate and notify you, referencing this form. | |

| Section 4- Action(s) | | | |
|---|---|---|---|
| Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done. | | | |
| **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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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.