

Compliance Assessment Report

Report ID:
CAR_NRW0035476

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

Site	Cross Hands	Permit Ref	BU8002IT		
Operator/Permit holder	Dunbia UK				
Regime	Installations				
Date of assessment	23/05/2019	Time in	09:00	Out	12:30
Assessment type	Audit				
Parts of the permit assessed	See agenda				
Lead officer's name	Jenkins, Nicholas				
Accompanied by					
Recipient's name/position	Katy Rogers/ HSE Manager	Date issued	11/09/2019		

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
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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

Attendees

Fiona Mclachlan – UK HSE Manager (Dunbia)

Katie Rogers – HSE Manager (Dunbia Cross Hands)

Neil Crawshaw – HSE Manager (Dunbia Llanybydder)

Nick Jenkins – Senior Officer Industry and Waste (Natural Resources Wales)

Agenda

1. Review of actions and recommendations from previous audit - CAR_NRW0033432
2. Food waste reduction audits at the site – Courtauld Commitment
3. Implementation of the revised BREF/BATc for the Food, Drink and Milk industry sector.
4. Succession planning and training
5. Annual Returns 2018 - CAR_NRW0034647
6. Ammonia increase on W5 and W6
7. Any Other Business

1. Review of actions and recommendations from previous audit - CAR_NRW0033432

One action which remains incomplete (see below) and was made in relation to the integrity of the Effluent Treatment Bund (ETP) reference ConT-001.

Reference	Description	Action(s)	Response
ConT-001	Effluent Treatment Plant bund	Additional area of concern – Electrical cabling connections transect the bund as	Further clarification is required by the operator, to establish the

		they travel between the item of plant and the energy source. This will render the bund ineffective as there is a pathway through the cable housing.	responsibility of SSE's cable connections through ConT001.
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Action – Dunbia to provide clarification regarding the responsibility of the SSE cables which transects the ETP bund and therefore impacts upon the permeability of the bund. Dunbia to then consider and where appropriate, raise the cabling above ground.

1. Dunbia and the Courtauld Commitment 2025

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It is estimated that around one-third of food produced for human consumption is lost or wasted which equates to approximately 10 million tonnes or £20 billion per annum.

On 25 September 2015, the 193 Member States of the United Nations adopted the 17 Sustainable Development Goals (SDGs) of the 2030 Agenda for Sustainable Development, global objectives expected to guide the actions of the international community over the next 15 years (2016-2030).

The 2030 Agenda offers a vision of a fairer, more peaceful world in which no one is left behind. The new Agenda includes:

- 17 goals, 169 targets and 230 indicators;
- Means of implementation and the global partnership;
- Review and follow-up.

The Food and Agriculture Organisation of the United Nations developed the following goals based on SDGs:

- Zero Hunger
- Gender Equality
- Clean Water and Sanitation
- Life Below Water
- Life on Land
- **Responsible Consumption and Production**

It is from the final SDG that the Courtauld 2025 commitment waste targets were developed. Signatories to the commitment agree to work toward a collective goal: to cut the amount of resource needed to provide our food and drink by one-fifth in 10 years. The targeted overall outcomes from 2015 to 2025 calculated as a relative reduction per head of population, are:

- 20% reduction in food and drink waste arisings in the UK;
- 20% reduction in the Green House Gases (GHG) intensity of food and drink consumed in the UK;
- A reduction in impact associated with water use in the supply chain.

To be able to achieve these outcomes the commitment aims to have 50% of the UK's largest 250 food businesses measure, report and act on food waste by 2019 and all food businesses by 2026. Dunbia falls within the first tranche of organisations and signed up to the agreement (see below) With all food businesses signed up by 2026, the idea would be that best practice, learning points can be shared to build a more sustainable industry where waste, water and GHG intensity are reduced.

The roadmap to achieving the outcomes has two milestones in 2019 – March and September. In March the business is expected to have an action plan to reduce food waste in their own operations and retailers have engaged with their suppliers. By September they are expected to publicly report food surplus and waste; to have a target and are measuring, reporting and acting on food waste; and finally, are engaging their suppliers to also target, measure and act.

Courtauld Commitment 2025 Signatories

We are stronger when we deliver together, and to find solutions to really big issues we have to collaborate. Watch our new video [Reshaping the supply chain](#) which records the collective ambition of Courtauld 2025 signatories. We're thrilled to count all of these businesses and organisations as Courtauld 2025 signatories.

Dunbia has achieved its March milestone and has committed to achieving the milestone in September. The operator advised that the business is at a crossroads following the merging of Dunbia and Dawn Meats but has recently reviewed its corporate social responsibility strategy following the change. Dunbia is a market leader in its field and one of the aims of the commitment is to share best practice, learning points during the 10 years with other industries, some of which are much smaller in scale and would inevitably help them develop their waste strategy and consequently their business.

Implementation of the revised BREF/BATc for the Food, Drink and Milk industry sector.

1. The Food, Drink and Milk Best Available Techniques (BAT) conclusions are being translated at present (into 14 languages), they will then be published to the EIPPCB website <https://eippcb.jrc.ec.europa.eu/reference/> around Autumn 2019. We discussed a NRW BAT gap analysis worksheet that will assist Dunbia in identifying whether it is achieving the required standard, or if a lead in time was needed to achieve the 4-year anniversary deadline on publication of the BREF. The worksheet will be sent with this report and we would recommend Dunbia completes this exercise

Action – NRW to email the BAT gap analysis sheet.

1. Succession Planning and Training

Dunbia operate a graduate training scheme for all disciplines including H&S and environment (HSE) and are aware of the necessity to recruit and develop graduates to grow its business for the future. Since the departure of Alison Trace in January 2019, Katy Rogers has stepped into the role developing within the 4 years as an employee of Dawn Meats and now Dunbia. Katy has the support through the HSE network via Neil Crawshaw, Luke Healy and ultimately Fiona as each site is similar in HSE issues and regulatory responsibilities. A new environment graduate is now in post since September 2018 and will sit behind Katy in developing their experience in the role.

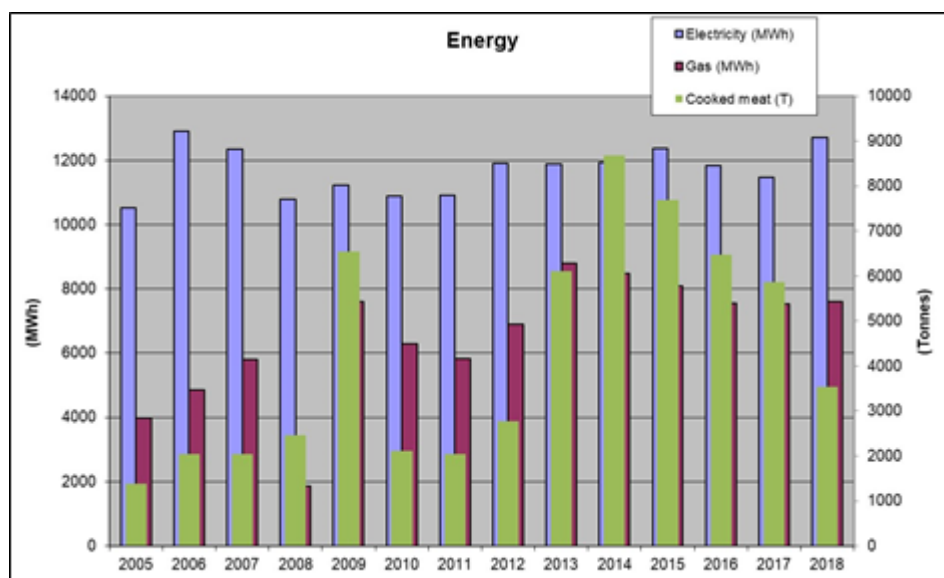
Training for the role is mainly inhouse and can be at different locations under the Dunbia umbrella. Dunbia described a training matrix for HSE members which is driven through the Environment Management System but confirmed that there is no specific training plan written down which could be viewed at this visit. Instead the training procedures within the EMS is reviewed every 3 years.

Recommendation – Dunbia to provide a copy of the training matrix for Katy Rogers which identifies ongoing development.

2. Annual Returns 2018 CAR NRW0034647

An action following the review of the annual return figures for 2018 was to discuss some of the issues raised which included:

- The relationship between cooked meat and gas used – The graph presented below represents the MWh of gas used against cooked meat (T). What is clear from the graph is the decreasing volume of cooked meat since 2014 whereas a corresponding decrease is evident from 2013 until 2017 for gas usage but there is an anomaly in 2018. The cooked meat volume drops significantly as the gas volume increases.
 - Dunbia advised that the reduction has been because of a change of product i.e. Fori bar. This is a high energy intensive product, but low in weight. It also advised that the production of Gressingham duck had similar weight to energy properties, but the level of duck produced has been consistent.
 - **Action – For future submissions of annual reports, Dunbia to provide an explanation of any trends based on previous year's data, including any anomalies.**



- The relationship between specific water consumption and potable water – Potable water usage has decreased by around 30% in 2017 but a 72% increase in specific water consumption.
 - Dunbia advise that it provides a water figure based on the water used in production rather than total water used as a site. Whereas the figure in the annual report is 4465m³ the actual total volume of water used at the site is 100,225m³.
 - It is unclear whether comparisons are made between the three meat categories produced at the installation and the associated water use
 - The permit requirement is potable water use against m³/T of raw packaged meat; cooked meat and value-added meats.
 - **Action - For subsequent annual reports, Dunbia to provide water usage against annual production of raw; cooked and value-added meats.**

1. Ammonia increase on W5 and W6 – report submission

As outlined in CAR_NRW0035021 –

An email was sent to the operator 08 January 2019, requesting that it revisits its quarterly submissions against a proposed increase in the permitted limit for Ammonia at W5 and W6. An increase of 0.05mg/l was suggested, and we asked Dunbia to review its submissions going back to Q1 2014. To date this has not been submitted for review. These results will be discussed at the next opportunity.

To date this has not been submitted.

Recommendation – Dunbia to consider whether an increase in its limit for Ammonia for W5 and W6 is required.

2. AOB

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- i. Surface water from the north of the Cross Hands food business park is collected in a drainage pond which serves Dunbia but also other smaller food and drink businesses to the west of Dunbia. Reports have been received of a discolouration of the drainage pond and subsequently these have been reported to NRW for investigation. 22 May 2019 a report was logged with NRW, investigated, and an additional incident re-occurred 23 May. On inspection of the pond following the meeting, it was evident that a small trickle of discoloured water was entering the pond (see photo below). At the outlet was the presence of sewage fungus and a slight odour. The findings were reported back to the investigating team. The local environment management team advised that it had visited the sites feeding surface water into the drainage pond, checked all the drains but no further action was taken on any of the sites due to the pollution clearing at the time of inspection.



Recommendation – Dunbia to continue to report incidents of discolouration of the drainage pond to NRW incident communications centre on 0300 065 3000 as soon as they are identified.

- i. While attending the above pollution, it was evident that a chilled trailer unit (NRE1011 FRC-11-2022 NR Evans) was running on its diesel engine during unloading at the bay. Dunbia has invested in electrical hook-ups to reduce the need for units to run on diesel while unloading. Part of the reason for this drive was several noise complaints being received which were thought to be associated with diesel engines.

As a result of the complaints Dunbia created a procedure (ref SEP.11.3) for ensuring that all refrigerated trailers are connected to an electric supply whilst operational at the site. The aim of this as the operator made clear, was to reduce the potential for noise emissions from the site in accordance with current BAT. NRW was not aware of any reviews of the procedure of which 5 subsequent amendments have been made. Procedural reviews that relate to activities that have caused complaints are required to be approved by NRW before being implemented.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0035476**

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Site	Cross Hands	Permit Ref	BU8002IT
Operator/Permit holder	Dunbia UK	Date	23/05/2019

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.

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.

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.