

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

Site	Llangefni prepared meats			Permit Ref	SP3430RL		
Operator/ Permit holder	2 Sisters Food Group Limited						
Date	20/08/2015			Time in	10:00	Out	16:00
What parts of the permit were assessed	EMS Audit						
Assessment	Audit	EPR Activity:	Installation	X	Waste Op		Water Discharge
Recipient's name/position	Steve Jones (SJ)						
Officer's name	Matthew Kelk			Date issued		24/09/2015	

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	C4	4.1.7
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	A	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	C3	2.3.2 & 2.3.3
	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	C4	2.8.1
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A	
	2. Records of activity, site diary, journal & events	A	
	3. Maintenance records	A	
	4. Reporting & notification	C4	4.1.2
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	4	Total compliance score (see section 5 for scoring scheme)	4.3
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If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (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 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.

Following the Environmental Management System (EMS) audit in December 2014, a further EMS audit was carried out on the 20 August 2015. Since the last EMS audit the management system has been rewritten from scratch. The site is aiming to be certified to ISO 14001 in the next few years.

Environmental Policy

Two environmental policies were made available during the audit, a top level 2 Sisters Group policy which feeds into a site specific environmental policy. The site policy makes a commitment to comply with environmental legislation and mitigate the impacts of the site on the environment and a commitment made by management to both.

Significant Aspects

A comprehensive list of aspects that could have an impact on the environment has been compiled by the site SHE manager. There is a procedure in place that uses a scoring system to rank aspects so that the most significant aspects are identified. Although this procedure was in place the aspects register does not appear to have been scored and as such there is no documentation listing the most environmentally critical activities carried out on site.

Recommendation

As discussed during the audit it is essential to include the scoring system on the aspects register and to document the most significant aspects identified. Please forward an updated aspects register with scoring to NRW by 24/10/2015.

Objectives

Objectives have been set by site SHE manager, these include:-

Water reduction & aim to meet 6.5 litres/bird target,
Review type and quantity of waste,
Odour control - fitting of offal house roof and double carbon filter on the effluent balance tank,
Noise - review of vehicle movements at night and revision of complaint procedure,
Ammonia plant - review of condition,
Review of training,

Progress against site objectives are tracked in an objectives actions tracker and reviewed on a regular basis.

Staffing Resources

A document was produced during the audit detailing the roles and responsibilities of key site personal in relation to the implementation of the EMS. This is carrying out a top down approach from the 2 Sisters Group Sustainability Director down to the site SHE Manager. It also details the responsibilities of the various managers across site e.g. effluent plant manager, engineers etc.

Due to recent staffing issues on site NRW has concerns as to who has overall responsibility for environmental issues/EMS if

the site HSE manager is unavailable.

Recommendation

Resilience should be built into the EMS system that if the SHE manager is off for any length of time, another member of site staff with a knowledge of the EMS and permit responsibilities will be able to deputise in his absence.

Operational Procedures

Procedures have been compiled for the key environmental aspects on site. Currently these are available on a computerised system and are reviewed annually by site SHE manager.

The following procedures were audited:-

External odour monitoring (sniff test) checks,
Blood transfer and associated abatement,
Sludge transfer and associated abatement,
Yard clean down,
There is no procedure in place for the collection of Animal by Product (ABP) wastes.

All audited procedures appeared to be fit for purpose.

Recommendation

Procedures should be put in place for the storage and collection of ABP wastes on site, detailing collection procedures and cleanliness standards in this area of the plant. 2 Sisters site in Sandycroft has a similar procedure already in place.

Incident Management

Procedures with regards to incident management were audited in particular odour investigation was discussed. An odour investigation procedure is in place for any reported incidents, (further monitoring is being carried out a weekly basis).

Site were asked as to whom deals with out of hours incidents and this is designated to the Engineering team leader.

Site have a full business continuity plan this details the plans put in place to deal with any adverse effects on the plant and how the plant keeps running in this situation or shutdown.

Change Management

Site were asked how impacts from new projects are addressed. Generally, pre-audit meetings are held alongside weekly meetings held between senior managers on site. This allows all management levels to input into the process prior to the project coming on board.

Permit

Permit Condition 1.3:-

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 hard copy of the original permit, all associated variations and transfers is kept in the SHE manager's office. The folder was viewed during the audit.

All 2 Sisters Llangefni management staff can also view the environmental permit and variations on the site server.

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.

Finding

All procedures in the new EMS have been drafted recently (i.e. last few months) as such no training rollout has been carried out with regards to the EMS.

Training records checked for staff members audited, some procedural training has not been refreshed for up to 9 years.

Compliance/Action

Breach of condition 2.3.2 and 2.3.3 above, scored one category 3 score.

Site to ensure training has been carried out with regards to EMS and permit compliance by 24/10/2015.

Maintenance

Permit Condition 2.3.5

All plant and equipment used operating the Permitted Installation, the failure of which could lead to an adverse impact on the environment, shall be maintained on 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 plant and equipment:-

Permit condition 2.3.6.1

A written or electronic maintenance programme; and

Permit Condition 2.3.6.2

Records of its maintenance.

The scald scrubber is under hire/lease from Parsons Engineering and as such regular maintenance (of at least monthly checks) is carried out on the equipment. Engineering hold records for this.

Checks are carried out daily by the effluent plant operatives on the Chemical Scrubber for the Sludge tank, Blood tank and Scald line/ tank to ensure that these are running under correct conditions for odour removal from the process. Faults are logged and reported to maintenance. Records were made available during the inspection.

Several issues were raised with regards to the scrubbers on site as outlined below:-

Scald scrubber – site were asked as to whether the scald scrubber could run out of hypo/ caustic solution and stop the effective running of the abatement kit. Site advised that the procedure is to change the IBC's of hypo/caustic when they reach a quarter full.

Recommendation/Action

Blood scrubber – hypo and caustic levels and its feed to the scrubber are checked on a daily basis. Operator to consider testing of the pH of the scrubber liquor, as is carried out currently on the scald wet scrubber.

Site employs a computerised maintenance system which flags when environmental critical parts of the process require checks. Maintenance records were made available for following process kit:-

Alarms, Sludge scrubber, sludge tank bund, scald extraction, scald scrubber, scald bund, spill kits and blood scrubber. Records showed that all kit had been recently maintained.

Non destructive integrity testing has been recently carried out on the sludge tank and SH verbally communicated that the results showed that the tank was in good condition.

Action.

Site to provide report of integrity testing to NRW by 24/10/2015.

Condition 4.1.2.

The Operator shall, unless otherwise agreed in writing, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit:-

4.1.2.1 in respect of the parameters and emission points in Table S2 to Schedule 2;

4.1.2.2 For the reporting periods specified in Table S2 to Schedule 2 and using the forms specified in Table S3 to Schedule 3;

4.1.2.4 to the Agency within 28 days of the end of the 28 days of the end of the reporting period.

Condition 4.1.7

The Operator shall, within two months of the date of this permit, submit a detailed site protection and monitoring programme, in accordance with and using the appropriate template format given in the Land Protection Guidance. The Operator shall implement and maintain the Site Protection Monitoring Programme (SPMP) submitted under condition 4.1.7, and shall carry out regular reviews of it at a minimum frequency of every 2 years. The results of such reviews and any changes made to the SPMP shall be reported to the Agency within 1 month of the review or change.

Condition 2.8.1

The Operator shall maintain and implement when necessary the accident management plan submitted or described in response to 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 with 2 months of its completion.

Finding

Since January 2015 further monitoring returns/reports specified by the permit have not been submitted to NRW by the designated time:-

Compliance/Action

Breach of condition 4.1.2, condition 4.1.7 and condition 2.8.1, scored three category 4 scores.
Please supply above monitoring/reports to NRW by 24 October 2015.

	EPR Compliance Assessment Report	Report ID: SP3430RL/0248647	
This form will report compliance with your permit as determined by an NRW officer			
Site	Llangefni prepared meats	Permit	SP3430RL
Operator/ Permit	WW&E (Wales And West England) Limited	Date	20/08/2015

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. 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.	X
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			
B2	C4	See text for details	24/10/2015
C1	C3	See text for details	24/10/2015
D2	C4	See text for details	24/10/2015
G4	C4	See text for details	24/10/2015

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.