

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

Site	Dowlais Slaughterhouse EPR/AP3433ES	Permit Ref	AP3433ES		
Operator/Permit holder	2 Sisters Red Meat Limited				
Regime	Installations				
Date of assessment	27/05/2016	Time in	10:00	Out	12:00
Assessment type	Audit				
Parts of the permit assessed	As indicated in CAR Form				
Lead officer's name	Griffiths, David				
Accompanied by	Willey, David				
Recipient's name/position	Rob Lavercombe/ Environmental Manager	Date issued	12/07/2016		

### Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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
A1 - Specified by permit	A	
B4 - Infrastructure - Containment of stored materials	A	
D1 - Incident Management - Site security	A	
F1 - Amenity - Odour	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	A	
F5 - Amenity - Deposits on road	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	

**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.

<b>Number of breaches recorded</b>	<b>0</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>0</b>
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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 Meeting with Rob Lavercombe and Matt Dight (2SFG), Dave Griffiths (Site Inspector NRW), David Willey (Food and Drink Sector Lead NRW)

- Discussed recent odour complaints to sewer and air. 2SFG confirmed that their investigations had not detected any odour in the Dowlais community from the drains or airborne odour. However, odour was detected in proximity of the installation by 2SFG and they have actioned a deep clean of the yard area, holding pens and undercroft.
- Discussed previous Schedule 1 Notification in December 2015 regarding Oil and grease – 2SFG investigations did not identify and sources of pollution. NRW agreed no further action with this at this time.
- During the routine inspection we noted the new beef blood storage facility and agree no odours associated with this and believe is best practice????
- Discussed Energy efficiency audits – this was the focus for 2SFG this year with many projects in development stage
- Discussed NRW regulatory focus for the food and drink sector this year: NRW focus will be on containment, accident management and incident management.
- Concerns were also raised by 2SFG regarding the amount of unsightly fly –tipping in Perngarnddu and was not a good impression for visitors to the installation. NRW confirmed this was an issue for Merthyr Council/ local councillor / MP

The status of the Best Available Techniques Reference Documents (BREF) for Slaughterhouses and Animals By-products Industries was discussed. The review is yet to commence.

The NRW Food and Drink sector has the following 2016/17 objective to achieve.

*The objective of the sector plan is to review all the tank storage and associated bunding and drainage on site and assess against the requirements of 'Containment systems for the prevention of pollution' CIRIA C736 published in 2014.*

Where identified upgrade works will be carried out within agreed timeframes. The associated accident management plans will also be reviewed in line with inspection techniques and accident prevention techniques. This will also include identification of a critical parts list to ensure that any malfunction is swiftly rectified as well as identifying the potential impact that flooding may have on containment.

The sector continues with the following additional targets:

- Identify and incorporate the SMNR principals (Sustainable Management of Natural resources).
- Identifying and Implementing COMAH 2015 where applicable.
- Consistency in regulation
- Resource and energy efficiency
- Waste and by products
- Water framework directive

During the visit NRW were informed that 2 Sisters Food Group have a new head of energy across the whole of the group. Chris Conicker will be using the Merthyr site as a pilot for energy efficiency.

The use of an APC System that separates blood has proven to be very successful, this has enabled the blood to be further treated and used when it leaves the site, and it also has the added advantage that the odours associated with blood it eliminated.

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0023747**

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Site	Dowlais Slaughterhouse EPR/AP3433ES	Permit Ref	AP3433ES
Operator/Permit holder	2 Sisters Red Meat Limited	Date	27/05/2016

### 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.

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 reports 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 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.