

Compliance Assessment Report CAR_NRW0041722

Permit being assessed: SP3635CS.

For: Peter's Food Service, held by Peter's Food Service Limited

At: Unit 1 Greenway , Bedwas House Industrial Estate, Bedwas, Caerphilly, CF83 8XP.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 25/04/2023 between 10:00 and 12:00.

Parts of permit assessed: A1

NRW Lead Officer: Ian James.

Report sent to: Dafydd Davies, Environment, Health and Safety Manager on 26/04/2023.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

CAR form for Peters Foods – EPR-SP3635CS

Inspection on 25 April 2023.

Present;

Dafydd DAVIES – SHE Manager

Ian JAMES – NRW

Steve JONES – Ops Director (Present for start and end)

Summary;

There are zero breaches recorded at this time and **4 actions**.

IJ for NRW arrived on-site 1000h. Weather was dry and bright with a light breeze.

DD and SJ gave an overview of business operations, performance, utility costs and changes to working practices (4 day week, with more hours during busier periods).

Discussion of the DAF plant performance indicated that this was performing well, as per annual reporting, both for emissions to sewer and cost, although increasing costs of chemicals is noticeable.

No changes in management related to Environment reported.

1030h – Site walk including DAF overview.

DD gave an overview of the DAF equipment and how it worked. It was indicated that there had been a period of optimisation of the equipment as well as ongoing training.

The DAF plant falls under the definition of a Directly Associated Activity as follows;

[RGN 2 Appendix 2](#) defines a DAA

“directly associated activity” means an operation which—

- (a) has a technical connection with the activity,
- (b) is carried on the same site as the activity, and
- (c) could have an effect on pollution;

Action 1 – An application to vary the existing permit should be submitted. This will include the DAF as a DAA and also the boundary change that was highlighted in 2021. **Due: 26/Oct/2023**

Given that the effluent discharges to sewer then no H1 assessment is required.

Details could include the specification of the bund, and the capacity of the liquid holdings within the DAF process, to allow calculation that the bund is of sufficient size and built to appropriate standards (Ciria 736 etc).

Operation of the DAF will be controlled by a suitable management system and operated by suitably trained and qualified people as per the requirements of the Permit.

Action 2 – To ensure staff are trained against appropriate and suitable methods of operation. Operating techniques may be required as part of the variation application and training against the techniques may be audited in future. **Due: 26/Oct/23**

Other areas of site were viewed and no breaches identified.

1130h - Office round up

IJ confirmed the above findings and advised actions. In addition DD was advised to review any outstanding actions related to IC5 and IC6 of the current Permit and inform NRW if there are issues meeting the due dates.

Action 3 – Please give early notice of any issues relating to meeting the IC5 and IC6 items. **Due: 10th May 2023.**

Action 4 – Please provide the specification of the DAF bund and the volumes of the tanks within the DAF process to allow calculation of the capacity. **Due – 26/May/2023**

With thanks.

If you have any questions regarding this Compliance Assessment Report (CAR) form, please contact Ian James on 03000 654203 or via email on ian.james@naturalresourceswales.gov.uk

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.