

Compliance Assessment Report CAR_NRW0043533

Permit being assessed: AP3433ES.

For: Dowlais Slaughterhouse EPR/AP3433ES, **held by:** Kepak Group Limited

At: Pengarnddu Industrial Estate Dowlais Top , Merthyr Tydfil, South Wales, CF48 2TA.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2023.

Parts of permit assessed: Annual Returns.

NRW Lead Officer: Brigid Armstead, accompanied by Mostyn Wall.

Report sent to: Tom Caswell, Technical Services Manager, on 21/03/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3E - Emissions and monitoring - Monitoring	Action only (X)	
IR1A - Management - General management	Action only (X)	
IR3E - Emissions and monitoring - Monitoring	C4 No impact	2.10.8

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

Total non-compliances recorded	Total non-compliance score
1	0.1

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?

Criteria	Action needed	Complete by
IR3E	Review and resubmit Q4 results	05/03/2024
IR1A	Actions 3, 4 and 5 in report	05/03/2024
IR3E	Ensure that future monitoring complies with Best Available Technique	21/02/2024

Compliance criteria codes are listed in the 'Important information' section below.

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

Kepak Quarterly Returns and Annual Report 2023

Q1 Report 2023 Jan-March

Monitoring of release points W1 & W2 are compliant with the permit limits.

Release to Sewer. Monitoring of S1 is compliant with the permit

Q2 Report 2023 April-June

Monitoring of release points W1 & W2 are compliant with the permit limits

Release to Sewer. Monitoring of S1 is compliant with the permit.

Q3 Report 2023 June-Sept

Monitoring of release points W1 & W2 are compliant with the permit limits

Release to Sewer. Monitoring of S1 is compliant with the permit.

Q4 Report 2023 Sept-December

Monitoring of release points W1 & W2 are compliant with the permit limits.

Action 1: There appears to have been a data entry error in the final 2 lines of S1 results. Please can this be confirmed and re submitted

Annual Organophosphorus Compounds

Action 2: Results are not MCERTS accredited. This is a category 3 non-compliance. Please provide information on why this has happened, and actions taken to ensure that it does not happen again.

Response received on 4th March 2024: Reason for MCERTS non-compliance submitted in Kepaks response document. Non compliance categorisation amended to C4 as deemed to be an administrative error. Action Closed

Annual Report

Energy and Water Consumption 2023

The site used 17,928.3 MWh of delivered electricity and 46,613.58 MWh of Primary electricity in 2023.

Primary carbon dioxide was 4,582.48 tonnes in 2023.

The site used 19,049 MWh of delivered gas and 215,333 m³ of process water as used in 2023.

Energy and water consumption increased in 2023 from 2022.

Action 3: Please provide us with a copy of your ESOS phase 3 Audit report.

Waste

In 2023 the majority of waste was either recycled, sent to an anaerobic digester or for further rendering. Total waste was 42,307.78 tonnes, with only 98.45 tonnes/0.2% being sent to landfill. Packaging waste data is reported in mid march.

Action 4: There was a dramatic drop in total waste from 79,000 Tonnes to 42,000 Tonnes. In 2022 46,000 tonnes of cardboard and paper was reported. In 2023 58 Tonnes of cardboard was reported but no paper. Please provide further information on where paper is going.

Fugitive Emissions Report

Spillages.

There were no reportable spillages on site during 2023. Spill kits are strategically placed around the exterior of the site, near to the storage of chemicals and oils, and near vulnerable receptors.

Action 5: Two accidental releases of refrigerant gas (R448) recorded, please provide further information on the amounts of gases released and the circumstances around these releases.

EMS improvement report

Kepak has corporate and site EMS targets. Kepak has significantly reduced the energy per tonne of product over the last few years to 2022. Energy usage increased in 2023. Kepak has identified energy and water reduction as a priority in 2024.

The table below shows the sites results over the last few years.

Environmental Objective	2021	2022	2023
Compliance			
Environmental Permit Banding 50% A/B 0% E	D	E	B
Environmental Complaints Reduction in Complaints	18	4	0
Reportable Environmental Incidents Reduce and Eliminate	6	2	0
External Environmental Non-Compliances Reduce and Eliminate	26	17	9
Energy and Water			

Water use per tonne of production Reduce water usage by 2% (m³/MT) by 2023	2.16	2.21	2.46
Energy use per tonne of production Reduce energy usage by 2% (kWh/MT)	660.09	597.3	662.45
Waste			
Landfill Zero to Landfill	Not achieved	Not achieved	Not achieved
Recycling Increase recycling per tonne of production by 2% (kg/MT)	0.45kg/MT	1kg/MT	1.34kg/MT

Waste Disposal

The site continues to send contaminated plastics to landfill, due to contractor restrictions

Alternative contractors for waste collection are being considered in Q1 of 2024, with zero to landfill being a stipulation of all potential contracts

Projects completed and ongoing:

- The site now has weekly energy and water management meetings between the Environmental Team and Senior Management which commenced in the 2nd half of 2023. Performance against objectives and opportunities for improvement are discussed to drive resource efficiency at site.
- Slaughter knife steriliser units are the most water and heat intensive assets on site, and as such was the first area of focus following the commencement of Energy Management meetings. Flow and pressure of the water input to the sterilisers were reduced, and Standard Operating Procedures (SOPs) developed to standardise turn-on, adjustment, and shutdown of each steriliser.
- The site are in the infancy stage of a number of projects to reduce water consumption, including: (a) tripe room project; (b) gut room project; (c) tray wash project; and (d) steriliser replacement.
- The site, along with other sites in the group have undertaken a water mapping project which is designed to identify points of high water usage and opportunity for savings. The method places an energy and monetary value on water streams based on factors such as volume, heat input and chemical input. The result of this exercise so far has highlighted the need for more internal meters to gain a clearer picture of site water flow.
- There are a number of on-going energy saving projects, including (a) roof-based solar panels; (b) toolbox talks on energy wastage; and (c) sub-metering.

End.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.