

Our Ref: EPR/WP3231NB

Mr John Potter
Dairy Partners (Cymru Wales) Ltd.
The Creamery
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Carmarthenshire
SA38 9DQ

Date: 23rd October 2023

Dear Mr Potter

EPR- WP3231NB Dairy Partners (The Creamery, Newcastle Emlyn) Improvement Conditions Review

Thank you for submitting Dairy Partners' responses to discharge the requirements of Improvements Conditions (IC) 18 of the environmental permit EPR-WP3231NB.

- Email received on 04/10/2023 from John Potter (Dairy Partners) with response to IC18.

Documents received from Dairy Partners:

- Dairy Partners NRW BATC Returns Summary Spreadsheet 04102023 (pdf)

As you are aware, ICs were included as part of a recent permit variation (application made to include the upgraded Effluent Treatment Plant (ETP)) which was issued by NRW in March 2023. The permit also underwent a review and was varied (May 2023) following the publication of the revised Best Available Techniques (BAT) Reference Documents (BREF) for Food, Drink and Milk Industries. Some additional Improvement Conditions have been included to bring the site up to the necessary standard. Further IC responses will be required from the site in due course.

We have reviewed the responses to IC18. Please see IC18 wording and comments below.

The Operator shall review and update (where required) their Environment Management System to include all the requirements as stated in BAT Conclusion 1 of the Food, Drink and Milk Industries BRef Document (EU 2019).

IC18

A copy of the reviewed and if applicable revised EMS shall be provided to Natural Resources Wales.

The operator has submitted 'Dairy Partners NRW BATC Return Summary Spreadsheet 04102023' which includes a summary of how the site complied with the BATc for BAT1 (EMS) (a copy of the EMS itself has not been provided). There are several parts/requirements to BATc 1. Some responses are lacking in detail and required additional information, as follows:

BAT 1 Environmental Management Systems

- BAT1 (i) - You have confirmed the site's *Environmental and Sustainability Policy* is reviewed every year (August). Please confirm this includes involvement of senior management who should also be committed and accountable for the implementation of the EMS.
- BAT1 (ii) - Please provide a description of how all parts of BAT1(ii) are met as it is not clear from the response provided. Please provide a summary as per the *Draft EMS Guidance Manual* quoted.
- BAT1 (iii) - Please provide a summary of the details included within the *Newcastle Emlyn Environmental and Sustainability Policy, Version 3*, issued 25/08/22 document that confirm includes continuous improvement.
- BAT1 (iv) - Please provide a summary/description of the *Environmental Objectives Statement* demonstrating how it meets BAT 1(iv).
- BAT1 (vi) - Please provide a summary as per the *Draft EMS Guidance Manual* document quoted regarding the requirements of BAT1 (vi) (information required on roles and responsibilities in relation to environmental aspects, objectives and provisions of the financial and human resources needed).
- BAT1 (viii) - Please provide a summary of the internal and external communications implemented on site as documented in *EP-011 Environmental Communications*.
- BAT1 (xi)- Please provide a summary as per the *Draft EMS Guidance Manual* quoted of how effective operational and planning process controls are implemented into the EMS.
- BAT1 (xvii)- Confirm internal and external auditing will be an ongoing process and will take place past the planned audits for 2024.
- BAT1 (xiv)- Confirm continual senior management involvement past 2024.
- Please provide a copy of the full revised EMS document.

The submitted document, 'Dairy Partners NRW BATC Return Summary Spreadsheet 04102023', also includes updated responses to BAT 2 and BAT 6 which were not previously provided as part of the permit variation V005 (varied permit following the publication of the Best Available Techniques (BAT))

Reference Document (Bref) for the food, drink and milk industries). Please provided additional information in relation the following points:

BAT 2 Efficiency:

- BAT 2 (I) - Provide the process flow sheets/process diagrams in relation to this BAT conclusion.
- BAT 2 (VI) - Provide further details on how the monitoring strategy will aim to increase resource efficiency.

BAT 6 Energy Efficiency:

- BAT 6(a) - Provide copy of Energy Efficiency Plan now in place on site.

You will need to review and submit a response/updated document to NRW by the 30th of October 2023 (unless otherwise agreed in writing with NRW).

The *Dairy Partners NRW BATC Return Summary Spreadsheet 04102023* submitted, included holding responses with regards to in-house testing of effluent. A response was sent by NRW (Alex Bowder) on the 9th October confirming the proposed testing in-house was acceptable provided that:

- the test kits are suitable for the effluent being analysed (i.e. there has been a proper evaluation of the equipment against the sample matrix of the effluents produced on site);
- robust QA and QC procedures for the sampling and monitoring of the effluent.

You must ensure that you conform to the standards for the elements of the monitoring being undertaken.

All other BAT conclusion responses within the submitted document have not been reviewed on the assumption these are the same as previously submitted as part of previous permit variation work.

Yours sincerely



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Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.