

## Compliance Assessment Report CAR\_NRW0044424

**Permit being assessed:** GP3235GH.

**For:** Dolwen Abattoir EPR/GP3235GH, **held by:** Pilgrim's UK Lamb Ltd

**At:** Dolwen Abattoir , Dolwen, LLANIDLOES, Powys, SY18 6LX.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 23/05/2024 between 10:10 and 12:10.

**Parts of permit assessed:** SEE NOTES (Section 4).

**NRW Lead Officer:** Victoria Griffin, accompanied by Kathryn Bradshaw.

**Report sent to:** SHE Manager, SHE Manager, on 29/05/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Action only (X)	
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR3A - Installations - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR3D - Installations - Emissions and monitoring - Noise and vibration	Assessed (A)	
IR3F - Installations - Emissions and monitoring - Pests	Action only (X)	

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

Total 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?

Criteria	Action needed	Complete by
IR1A	See EMS Actions below	31/12/2024
IR3F	See below regarding pests and vermin	31/07/2024

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

The Compliance Assessment Report (CAR) has been generated by the Natural Resources Wales (NRW) regulating officer following a pre-arranged Installation visit on 23 May 2024. The purpose of the Installation visit was to follow up the findings of the previous visit (19/05/2023). It was also an opportunity to discuss any new or proposed changes to the Installation now that the new ownership has become more established.

A brief initial meeting was held with the Safety, Health and Environment (SHE) Manager and the following was discussed:

### **Noise Monitoring**

The weekly environmental and health and safety check sheet is in the process of being updated. Currently the noise monitoring is being undertaken on a daily basis. It was agreed that the noise monitoring could be reduced to weekly. The change in frequency is on the basis that the time and day of the monitoring should be irregular to reflect the different processes and activities undertaken. The times of the noise monitoring should not be publicised to the wider staff to ensure the findings are reflective of actual activity noise.

Notwithstanding, NRW reserve the right to request that daily noise monitoring is resumed should the need arise.

### **Environmental Management System (EMS)**

The existing EMS procedures are in the process of being reviewed prior to them being incorporated into the new Operators ISO14001 accredited EMS. A large proportion of the existing procedures and records are to be reviewed and updated, new procedures will also be required to ensure the Installation will be compliant. On this basis only a limited number of the procedures were reviewed on the understanding that a more detailed evaluation would be undertaken by NRW at a later date.

The Environmental Accident Management Plan (the Plan) was discussed and it was noted that further detail would be prudent as part of the emergency cascade, particularly with regards to provision of contact details in the event of accidents and /or emergencies. The Plan details actions required in the event of a spillage and references all staff being trained to deal with a spillage. The SHE Manager recognised that the training record was out of

date and that this would be remedied during transferred to the new Company CORE system.

It is estimated that the EMS transfer to the new system and required updates will be completed by the end of 2024.

### **Effluent & Sludge Disposal**

The Operator confirmed that the sludge from the Effluent Treatment Plant (ETP) is disposed with GPS Services (Abergavenny) for Anaerobic Digestion. The same contractor can also take any excess effluent from ETP should the need arise. The disposal is operated on a "call out" basis, when the ETP Manager identifies the need for disposal.

Currently an Emergency Contingency Plan for the disposal of sludge and effluent is not in place. Consideration needs to be given to the actions that would be required in the event that the ETP is overwhelmed with sludge and effluent.

**Action 1. Develop an Emergency Contingency Plan for the management of sludge and effluent and submit to NRW by 31 December 2024.**

### **Installation Drainage**

It was reported that a drain collapse occurred in the process yard; this is the second reported collapse this year. The latest collapse is in the process of being investigated and repaired. Given the age of the Installation and the frequency of heavy vehicle movements, it would be prudent to update the Preventative Maintenance Plan (PMP) to include regular inspections of drainage to ensure the risk of environmental impact and disruption from collapsed drains is minimised.

**Action 2: Update PMP to include annual drainage inspections by a suitable contractor and submit to NRW for review by 31 December 2024.**

The SHE Manager accompanied the NRW regulating officers on a tour of the external areas of the permitted area, which included the effluent treatment plant (ETP), the process yard adjacent to the lairage, the boiler room and staff car park. The salient points observed are as follows:

### **Effluent Treatment Plant**

The ETP manager is very well informed of the ETP process and its intricacies and the ETP appeared to be well operated and maintained. In the event that the ETP manager is not present another operative is also conversant with the management of the ETP and the Operator confirmed that written procedures exist which detail the operation of the ETP. Nevertheless, it is strongly recommended that the procedures are reviewed and where necessary updated to reflect the current ETP process. It is also strongly recommended that further resilience is provided by training additional operatives.

The ferric dosing system is metered manually from an IBC. Consideration should be given to introducing an automated dosing system to minimise the potential of over /under dosing the system and unintentional spills and loss of the ferric compound.

The ETP manager confirmed tank level indicators are not present. Tank levels are assessed by observations from the top of the tank via the ladder system. Tanks discharge valves are

opened and closed based on these observations. Consideration should be given to the installation of level indicators and possibly alarms to minimise the potential of over topping.

### **Pest and Vermin**

During the tour, it was observed that a small number of crows were scavenging the Category 3 Waste bin resulting in a small amount of waste being dropped in the yard. This waste was observed to remain in-situ for the duration of our time in the yard. Whilst it is understood that the Category 3 bins are only left unattended and uncovered for a very short time period and the yard is washed down and cleaned at the end of the daily activities, the presence of waste could attract more problematic vermin, for example gulls. Operatives should recover any bits of animal waste in the yard immediately and dispose of appropriately.

**Action 3: Evidence of training or updated procedure for clearing scavenged waste shall be provided to NRW by 31 July 2024.**

### **Boiler House**

Two gas new boilers (<1MW) have been installed. The boilers duty and standby are identical and located within a purpose built container in the process yard. The boilers replace the old oil boiler and as such the oil tank has since been decommissioned and removed.

### **Staff Car Park**

The staff car park remains incomplete. The Operator confirmed that the improvements will be undertaken as part of the wider site improvements. A programme of works will be provided once finalised.

Overall the Installation was clean and tidy and there were no apparent odours, noise or significant pest issues recorded at the time of the visit.

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](mailto: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](mailto: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.