

## Compliance Assessment Report CAR\_NRW0046006

**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:** Report/Data Review,

**Reason:** Routine.

**On:** 31/12/2024.

**Parts of permit assessed:** See Section 4 (below).

**NRW Lead Officer:** Victoria Griffin.

**Report sent to:** SHE Manager, SHE Manager, on 04/02/2025.

### 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	C4 No impact	Condition 1.1
IR1C - Installations - Management - Energy Efficiency	Assessed (A)	
IR1D - Installations - Management - Efficient use of raw materials	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR4A - Installations - Information - Records	C4 No impact	Condition 4.1 & 4.2
IR4B - Installations - Information - Reporting	Assessed (A)	
IR4C - Installations - Information - Notification	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
2	0.2

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	Non-hazardous waste records (see below)	28/02/2025
IR4A	Non-hazardous waste recording (see below)	28/02/2025

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.

### **You are non-compliant with your permit.**

**At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.**

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 to comment upon the Q4 Monitoring Returns.

### **1. Q4 Monitoring Returns.**

Q4 2024 (October – December) monitoring results were submitted to NRW on 10 January 2025 in accordance with Condition 4.2.3.

#### **1.1 Emissions to Water - Emission Point W1.**

Emissions to water for Q4 were tested on 07/10/2024, 04/11/2024 and 09/12/2024. All parameters were within the emission limit values (ELVs) defined in the Permit (S3.2).

#### **1.2 Schedule 5 Notifications Parts A & B**

A Schedule 5 Notification Part A & B was received on 21 November 2024 relating to an oil separation pipe joint burst on the 21 November 2024. The burst resulted in approx. 21kg of R448A (N40) being released. An engineering contractor (Border Temperature Controls) attended the site and replaced the pipe and refilled the condenser with approximately 21kg of R448A.

The system was tested and approved for operation. The engineering contractor will continue to monitor the system for leaks and undertake preventative maintenance as required.

### **2. Annual Report**

The Annual Report was submitted to NRW via email on 31 January 2025 as required by

Permit Condition 4.2.2. The Annual Report provided all the information as required under the Permit.

## 2.1 Cadmium (Cd) and Mercury (Hg) Mass Balance

Mass balance calculations are below the permitted emission limit values for Cd and Hg.

## 2.2 Annual Production

Annual production for 2024, 738,601 units (18,893 tonnes) is similar to the previous year (767,553 units).

## 2.3 Performance Parameters.

A summary of performance parameters is as follows:

No non-hazardous waste production is reported for 2024, despite NRW previously being informed by the Operator that non-hazardous waste is generated by the facility and is sent to an energy from waste facility.

The Operator is required to record and report waste production. ***This is a breach of Condition 4.1 and 4.2 and has been scored C4.***

The absence of non-hazardous waste records also reflects a failure to implement and /or keep up to date the management systems. ***This is a breach of Condition 1.1 and has been scored C4.***

- Hazardous waste generated is similar to 2024 levels.
- Water usage is slightly lower, at 50,055m<sup>3</sup>, than 2023 (62,136m<sup>3</sup>).
- Energy use and CO<sub>2</sub> production are similar to 2023.

All other reported parameter contained the expected data, with no apparent issues.

## 3. Actions.

A number of actions are included on the previous CARs and are now overdue. The actions below require your **immediate attention**.

**CAR Reference NRW0044424 (issued 29/05/2024) - Action 1.** Develop an Emergency Contingency Plan for the management of sludge and effluent and submit to NRW by 31 December 2024.

**CAR Reference NRW0044424 (issued 29/05/2024) - Action 2:** Update PMP to include annual drainage inspections by a suitable contractor and submit to NRW for review by 31 December 2024.

**COMPLETED - CAR Reference NRW0044424 (issued 29/05/2024) - Action 3:** Evidence of training or updated procedure for clearing scavenged waste. ***Provided to NRW 25 October 2024.***

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.