

## Compliance Assessment Report CAR\_NRW0048549

**Permit being assessed:** XP3830UR.

**For:** Haverfordwest Creamery, **held by:** The First Milk Cheese Company Ltd

**At:** Haverfordwest Creamery Pembroke Road , Merlins Bridge, HAVERFORDWEST, Dyfed, SA61 1JN.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 09/06/2025 between 12:30 and 14:20.

**Parts of permit assessed:** See section 4 of report.

**NRW Lead Officer:** Kirsty Thomas, accompanied by Rhydian Cox.

**Report sent to:** The First Milk Cheese Company Limited, Business Unit SHE Manager, on 16/06/2025.

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

| Part of permitted activity assessed (compliance criteria)             | Assessment result | Permit condition |
|-----------------------------------------------------------------------|-------------------|------------------|
| IR3D - Installations - Emissions and monitoring - Noise and vibration | Assessed (A)      |                  |
| IR3C - Installations - Emissions and monitoring - Odour               | Assessed (A)      |                  |

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?

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**

This Compliance Assessment Report (CAR) details the comments of Natural Resources Wales (NRW) Officers for the site inspection conducted on 09 June 2025 at The First Milk Cheese Company Limited, Haverfordwest Creamery, Pembroke Road, Merlins Bridge, Haverfordwest, Pembrokeshire, SA61 1JN for activities held by The First Milk Cheese Company Limited (the operator) under the environmental permit ERP-XP3830UR.

The visit purpose was to inspect the recently installed noise mitigation measures (as listed in the site's Noise Management Plan - *HE-POL-016 Noise Management Plan v4 and 2024.J004582-7849-02 First Milk Haverfordwest Noise Assessment Issue 02 Full*) and to inspect the Effluent Treatment Plant (ETP) aeration lanes.

No non-compliance scores were recorded against the operator's permit conditions on this inspection.

**Noise mitigation measures**

A site tour was undertaken with several noise sources inspected. The noise generated by the main evaporator (cooling tower 1) was most dominant on Officers arrival to site.

The proposed noise mitigation for the main evaporator (cooling tower 1) includes the replacement of the current fans with a specialist whisper quiet fan and will attenuate sound from the pump. This improvement is planned for November 2025 during the site's planned shut down.

The following noise sources were inspected and newly installed noise mitigation observed:

- Cream dispatch pumps - Acoustic barrier has been installed.
- Milk intake pump - Acoustic screens had been installed rather than an acoustic enclosure of the pumps themselves.
- Cooling tower 1 process pumps - An acoustic enclosure has been installed.
- Cooling tower 1 - An acoustic barrier has been installed along part of the perimeter fence near dwellings.
- Vacuum pump room outlet - An attenuator has been installed.
- Cheese room outlet (cream room extractor fan) - An acoustic barrier has been installed on the flat roof where the fan is located.

First Milk recently received a noise complaint from a nearby property regarding a low-frequency whine. Following an internal investigation, it was identified that the noise was being intermittently emitted by the CIP (Clean-in-Place) plant. The component responsible for generating the noise was found to be non-essential and was subsequently removed, thereby resolving the issue.

First Milk have committed to continually improving noise level generated from the site over time and will review/undertake noise assessments following the complete installation of noise mitigation measures proposed this year. Further noise mitigation will be identified and

implemented if required.

**ETP aeration lanes**

As with previous visits, a green algae was observed within the aeration lanes of the ETP. First Milk/AOL recently provided additional information regarding the root cause of the algae and an assessment of any potential impact on the ETP performance and final discharge. See compliance report CAR\_NRW0046258 for further details.

NRW Officers shared their concerns of the potential long terms impacts the algae could have on the ETP, and ultimately final effluent quality.

First Milk/AOL have stated the presence of algae is not having an impact and they will continue to monitor the situation. If there should be any indication that the presence of algae begins to have a negative impact on operation, treatment performance or environmental compliance, there are several actions that can be taken e.g physical removal of the algae and optimising chemical dosing in the ETP.

During this inspection, odour in and around the ETP area was less distinct/offensive than previous visits. No odour was detected outside the site boundary.

**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](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.