

## Compliance Assessment Report for:

# STANDALONE MEDIUM COMBUSTION PLANT AND SPECIFIED GENERATORS

|                      |                                                                                                                            |                      |                   |
|----------------------|----------------------------------------------------------------------------------------------------------------------------|----------------------|-------------------|
| <b>Permit number</b> | PAN-003843<br>PAN-004025<br>PAN-003973<br>PAN-004125<br>PAN-004134<br>PAN-003844<br>PAN-003961<br>PAN-003845<br>PAN-003962 | <b>Operator name</b> | Welsh Power Group |
|----------------------|----------------------------------------------------------------------------------------------------------------------------|----------------------|-------------------|

|                           |                                                                                                                                                                                                                                                                                                         |
|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Site name</b>          | PAN-003843 Dafern Reserve Power Ltd<br>PAN-004025 Clyne Power Ltd<br>PAN-003973 Larigan Power Ltd<br>PAN-004125 Cynon Power Ltd<br>PAN-004134 Cadoxton Reserve Power Ltd<br>PAN-003844 St Asaph Power Ltd<br>PAN-003961 Culvery Power Ltd<br>PAN-003845 Nevern Power Ltd<br>PAN-003962 Ogmore Power Ltd |
| <b>Site address</b>       | Welsh Power Group Limited<br>Fourth Floor, 2 Kingsway, Cardiff CF10 3FD<br>Tel: +44 (0)2920 547200 Fax: +44 (0)2920 398248                                                                                                                                                                              |
| <b>Type of assessment</b> | EMS Audit                                                                                                                                                                                                                                                                                               |

|                           |            |                |       |                 |       |
|---------------------------|------------|----------------|-------|-----------------|-------|
| <b>Date of assessment</b> | 09/01/2023 | <b>Time in</b> | 08:00 | <b>Time out</b> | 17:00 |
|---------------------------|------------|----------------|-------|-----------------|-------|

|                                 |                             |
|---------------------------------|-----------------------------|
| <b>Parts of permit assessed</b> | EMS Permit Condition 1.1.1. |
|---------------------------------|-----------------------------|

|                                           |                                     |                       |            |
|-------------------------------------------|-------------------------------------|-----------------------|------------|
| <b>NRW Lead officer</b>                   | Geraint Harris                      | <b>Accompanied by</b> | --/--      |
| <b>Report sent to – Name and position</b> | Laura Davey – Environmental Analyst | <b>Date</b>           | 09/01/2023 |

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

| Part of permitted activity assessed<br>(use action criteria below) | Assessment<br>result | Permit condition |
|--------------------------------------------------------------------|----------------------|------------------|
|                                                                    | Choose an item.      |                  |
| C2 General management – Management system and operating procedures | X - Action only      | 1.1.1            |
| C2 General management – Management system and operating procedures | X - Action only      | 1.1.1            |
| C2 General management – Management system and operating procedures | X - Action only      | 1.1.1            |
| Choose an item.                                                    | Choose an item.      |                  |
| Choose an item.                                                    | Choose an item.      |                  |

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

| Total number of non-compliances recorded |
|------------------------------------------|
| 0                                        |

## 2. What action is required?

| Criteria | Action needed                                                                                                                                                                                                                                                                      | Complete by |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| C2       | Action1:Welsh Power has introduced a procedure for the establishment and maintenance of environmental objectives and targets, see procedure WP-ENV-003. Please can you provide a copy of this procedure and a copy of Welsh Power Objectives and Targets Programme and Action Plan | 10/02/2023  |
| C2       | Action 2: Please can you provide copies of past Environmental Management Review Meetings.                                                                                                                                                                                          | 10/02/2023  |
| C2       | Action 3: Please can you provide NRW with copies of previous internal audit reports.                                                                                                                                                                                               | 10/02/2023  |

Action 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 prosecutions and/or suspension or revocation of your permit.**

## 4. Details of our assessment

### Environmental Management System Audit of Welsh Power Group Limited (WPGL) Assets

*Dafen Reserve Power Ltd (PAN-003843), Nevern Power Ltd (PAN-003845), Ogmere Power Ltd (PAN-003962), Clyne Power Ltd (PAN-004025), Larigan Power Ltd (PAN-003973), Cynon Power Ltd (PAN-004125), Cadoston Reserve Power Ltd (PAN-004134), St Asaph Power Ltd (PAN-003844), Culvery Power Ltd (PAN-003961)*

All environmental permits under the Environmental Permitting Regulations 2016 contain a condition requiring a written environmental management system (EMS) and implementation of that system, along with evidence and records of its implementation and application. Permit condition 1.1.1 states:

**1.1.1 The operator shall manage and operate the activities:**

- (a) *in accordance with a written management system that identifies and minimises risks of pollution, so far as is reasonably practicable, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and*
- (b) *using sufficient competent persons and resources.*

**1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.**

The EMS should encompass all processes and operations at the site. Typically, the EMS should set the environmental policy, identify significant adverse environmental impacts, identify and comply with applicable legislation, set environmental targets, audit key processes and be subject to periodic internal and external review. There are also various conditions within the permit that specifically address maintenance, management, accidents, monitoring and resource use. These areas should be supported by the overall management system. As part of the permit application process and the ongoing operating techniques, the operator has submitted details of their EMS – this information forms the written intentions of the operator and structure of the EMS.

Due to the similarities of WPG's sites, it was decided to undertake a combined desk-based audit. An email requesting pertinent information was sent to the operator several weeks prior to the start of the desktop audit. The objectives of this audit were to establish the existence of a management system that ensures permit conditions are complied with and the objectives of the permit are delivered. It was also to assess WPG's ability to ensure applicable statutory and regulatory requirements are met and to identify where applicable, areas for potential improvement.

### **Areas Audited and Documentation List**

The following documentation was provided by the operator via email:

- ISO14001 Certificate (Group) – External certification undertaken by SGS.
- Welsh Power HSEQ Policy - WP-QPOL-001 HSEQ Policy Statement 20220124fGJ
- Environmental Manual – WP-EMSMAN-001– Includes the management system structure.
- Risk Register – QR-001 Risk Register
- Legal Register – WP-REG-001 HSE
- Risk Management Procedure – WP-QPRO-019
- Emergency Response Plan –
  - WPG-ERP-CAD-4-REV4 20220609dGJCT
  - WPG-ERP-DAF-4-Rev4 20220609dGJ
  - WPG-ERP-CLY-4-REV4 20220609dGJCT
  - WPG-ERP-CUL-4-REV4 20220609dGJ
  - WPG-ERP-CYN-4-REV4 20220609dGJCT
  - WPG-ERP-LAR-4-REV4 20220610dGJCT
  - WPG-ERP-NEV-4-REV4 20220519 dGJCT
  - WPG-ERP-OGM-4-REV4 20220609dGJCT
- Operational Control – Waste Management WP-ENVOC-001
- Operational Control – Chemical Management WP-ENVOC-002

- Operational Control – Contractor Management WP-ENVOC-003
- Operational Control – Contractor Management WP-ENVOC-004
- ECL Emissions monitoring report all sites.
- 1.1.b information - all sites
- 1.1.3 further information - all sites
- Email – confirming changes in monitoring of NOx

**ISO14001**

WPGL have an EMS that is certified to ISO14001 standards. They were initially certified on the 14<sup>th</sup> of May 2019. The latest certificate is valid from 14<sup>th</sup> of May 2022 until 14<sup>th</sup> of May 2025 and remains valid subject to satisfactory surveillance audits.

**Environmental policy**

WPGL's environmental policy is located within their 'Environmental Management System Manual (WP-EMSMAN-001) revision 6' (EMS Manual). This policy is called the 'Environmental Management System Manual Health, Safety, Environmental and Quality (HSEQ) Policy Statement' this was signed by the Chief Executive Officer on the 24<sup>th</sup> of January 2022 and is the 5<sup>th</sup> revision. Some of the more pertinent declarations within their policy include:

- As a minimum we will comply with all relevant legislation and statutes, codes of practices and industrial standards.
- All personnel demonstrate a commitment and leadership in health, safety and environment protection and quality management.
- We prevent pollution and reduce environmental risks through appropriate proactive measures.
- We maintain and continuously improve a management system with clear objectives, targets, roles and responsibilities.
- We provide effective health, safety, environmental and quality monitoring, auditing and review processes and take corrective action where appropriate.
- We promote a culture of continual improvement for health, safety, environment and quality performance.
- WPGL expects employees to be fully aware of this policy and understand their responsibilities.
- The policy states that the Chief Executive of WPGL is accountable for ensuring the HSEG policy is implemented, and its effectiveness is reviewed annually, all employees and contractors are responsible for applying this policy within their work.

An environmental policy must be established by top senior management and include commitments to the following:

- Protection of the environment, including prevention of pollution
- Commitment to fulfil compliance obligations
- Commitment to continual improvement of the EMS to enhance environmental performance.
- Comply with or exceed applicable legal requirements and other requirements to which the organization subscribes which relate to its environmental aspects,
- The policy might also include other commitments to minimize any significant adverse environmental impacts of new developments through the use of integrated environmental management procedures and planning,

Upon review of this Policy, WPGL are meeting such commitments, however WPGL may want to consider the following within their environmental policy could include:

- Efficient use of water and energy
- Efficient use of other natural resource
- Recycling and minimising waste
- Sustainable transport
- Minimising noise disturbance VOC-free paints)
- Working with clients and suppliers to encourage high environmental standards.
- Awareness and training employees on environmental issue
- procedures to minimise noise disturbance to neighbours

A review of WPGL's website shows that they are keen to emphasise their commitment to the environment. Having verified that a written management system exists and examining the overall environmental policy and management organisation, the next step is to look at the scope and structure of the EMS and how this leads to the identification and categorisation of significant adverse environmental aspects.

### **Environmental Aspects and Impacts**

The elements of an organization's activities, products and services that can interact with the environment are called environmental aspects. Changes to the environment, either adverse or beneficial, that result wholly or partially from environmental aspects are called environmental impacts. The relationship between environmental aspects and associated impacts is one of cause and effect. An organization should have an understanding of those aspects that have or can have significant impacts on the environment, i.e. significant environmental aspects. An organization should identify environmental aspects within the scope of its environmental management system that are associated with its past, ongoing and planned activities, products and services. In all cases, the organization should consider normal and abnormal operating conditions including start-up and shut-down maintenance and emergency situations and accidents. To facilitate planning, an organization should maintain appropriate information on the environmental aspects identified and those considered significant. The organization should use this information to understand the need for and to determine operational controls.

As part of this audit, an assessment was made of the sites procedure for identifying, then ranking,

significant adverse environmental aspects and their impacts. We refer to document 'Risk Register 20221018' and the associated impacts and aspects register. The methodology used by any company, may be qualitative or quantitative, or a combination of both. Establishing a scoring system can help to establish priorities for action. The key is to ensure that the methodology remains consistent for all aspects that give rise to environmental impacts. With regards to WPGL, each type of actual risk assessment is conducted by:

- Identifying the risk.
- Identifying the process for which the risk most likely dominates.
- Assigning a probability rating to the identified risk;
- Assigning a consequence rating if the risk were to be encountered.
- Calculating a final Risk Factor based on the equation:

$$\text{PROBABILITY RATING} \times \text{CONSEQUENCE RATING} = \text{RISK FACTOR}$$

Upon review of WPGL's approach it appears that a numerical range of 1 to 5 has been utilised with 5 considered the most critical. Upon reviewing their methodology, a score of 25

indicates the worst possible outcome. WPGL state that “for risks with a final Risk Factor rating equal to or greater than the threshold set in the Risk Register, management will decide whether to reject the subject due to the risk or accept the risks after the development of a risk mitigation plan. Risks with a factor less than the risk threshold may be accepted without a mitigation plan, unless otherwise directed by management. The final column allows for entry of an estimated risk factor after mitigation, which is an estimate on what the risk should be reduced to if the risk treatment is successful. Risks are managed with a focus on decreasing their likelihood and minimizing their impact if they should occur”.

If we look at ‘Safety and fire risk associated with power generation on Welsh Power sites as a specific example. WPGL have stated that risks of fire are unlikely to happen but have occurred in the past year. Consequently, they have scored it the maximum likelihood rating of 5. Since a fire may have a significant impact to the environment as well as costs, WPGL have given the consequence the maximum rating of 5. Therefore, WPGL have determined that the unmitigated risk factor for this aspect is 25 (the maximum). Since the score is above the threshold of 10, WPGL, have introduced mitigation plans to reduce the risk factor score. The associated mitigation is ‘plant containment, gas detection systems, smoke detection systems, Detection and prevention systems. Blast walls. Remote visualisation and alarms to prevent the fire from occurring’. As a result of this mitigation WPGL have revised the risk factor score to 6.

Looking at all of the risks listed within the register, nearly every risk factor has been reduced to a score of 6 or 4. There is however, no explanation or illustration on how these mitigation techniques reduce the likelihood and consequence individually. WPGL may want to update the Risk Register to include a breakdown on how the mitigation plans affect the likelihood and consequence individually. This may help to identify additional areas for improvement.

The identification of significant environmental aspects is an ongoing process that enhances an organisation's understanding of its relationship to the environment. It also contributes to continual improvement of its environmental performance through enhancement of its environmental management system. NRW are pleased to see the following within the EMS Manual “Aspects identified shall be monitored/measured to ensure that various legislation, regulations and consents are not being breached”. WPGL have, for operations/activities identified as significant aspects, created specific work instructions. These have been devised to ensure that such critical activities are carried out with minimal practicable environmental impact. These procedures and work instructions, according to WPGL, outline the conditions for controlling all activities, processes and functions which have an effect on the environment. These procedures have been reviewed later in this report.

## **Objectives and Targets**

This element of the EMS is closely tied to the establishment of significant environmental impacts

(see previous heading) as this is ideally (amongst other things) where the operator should aim to set

targets for improved environmental performance. The overall improvement target setting is obviously wider than the EMS aspects and impacts. WPGL's EMS Manual describes how objectives and targets are set taking into account the following: Legal & other requirements, Significant Environmental Aspects, Technological options, Financial requirements, Operational requirements, Business requirements and views of other interested parties. Targets are set out in Welsh Power Objectives and Targets Programme and Action Plan.



WPGL state “Targets/Actions shall have a completion date and employees’ responsibility for completion. Environmental management meetings shall form the mechanism for monitoring progress. Where completion dates for actions cannot be met due to unforeseen circumstances there will be authorisation to extend these dates”. The main Welsh Power objectives are detailed within Welsh Power Environmental Policy. Objectives and targets are determined at Welsh Power Management Review Meetings.

**Action 1:** Welsh Power has introduced a procedure for the establishment and maintenance of environmental objectives and targets, see procedure WP-ENV-003. Please can you provide a copy of this procedure and a copy of Welsh Power Objectives and Targets Programme and Action Plan. **Due 10<sup>th</sup> of February 2023.**

### **Legal Requirements and Register**

An organization should establish, implement and maintain a procedure for periodically evaluating its compliance with the legal requirements that are applicable to its environmental aspects, as part of its commitment to compliance. A register of legislative compliance should be reviewed as part of the EHS audit cycle and a register of EHS legislation maintained by the relevant EHS Manager / Coordinator. WPGL’s document ‘Legal register 20221018’ consists of a list of legal and other requirements, the implications of these requirements and the relevance to WPGL. The main points about this procedure are that WPGL makes a link between aspects controlled within the EMS and applicable legislation. This is evident within WPGL’s Risk Register, where they have assigned numerous aspects with the correct legal reference. The legal register document was last revised in June 2022.

### ***Environmental Monitoring, Measurement, Review and Internal Audits***

The principal purpose of these aspects and clauses in ISO 14001 is to ensure the operator reviews

the system, plans internal audits, carries out internal audits, leading ultimately to retaining registration to the standard and safeguarding the environment. A commitment by WPGL to undertake internal audits, at planned intervals, is stated within the EMS Manual. These according to WPGL will be used to determine whether the management system conforms to contractual and regulatory requirements. Their audits seek to ensure that the management system has been effectively implemented and is maintained. Welsh Power has a procedure for management reviews within document WP-QPRO-011. WPGL state that “The Management Review Meetings shall take place annually with more frequent meetings of every 12 months in the initial stages of the implementation of the system. Top management shall attend including the Safety Manager, and other persons deemed relevant. A structured agenda shall be prepared by the Safety Manager and shall be kept on record”. Details on where these management meetings will focus on are stated within the EMS Manual. Minutes of each meeting are to be kept on file with items for action shall be dated and reviewed accordingly.

NRW are pleased to see the following statement within the EMS “overall position is meeting legal consent conditions in relation to effluent and atmospheric emissions whilst ensuring all waste disposal complies with Waste Management Regulations. This shall be monitored and assessed regularly and recorded as part of our measurement review process or as per our internal environmental auditing procedures”. According to WPGL it is their policy to carry out prompt and effective action on the discovery of defective environmental procedures and/or

materials, and to evaluate the effect of this action in order to minimise the risk of it re-occurring. According to their EMS Manual, "Environmental corrective actions are maintained and filed. Changes in environmental procedure(s) resulting from corrective action are promptly implemented and recorded. All responses to a corrective action Request are subjected to a predefined time limit. Environmental corrective actions deemed as significant are discussed and analysed at the Environmental Management (Review) Meetings as and when deemed appropriate by the Welsh Power Office Management".

**Action 2:** Please can you provide copies of past Environmental Management Review Meetings. **Due 10th of February 2023.**

**Action 3:** Please can you provide NRW with copies of previous internal audit reports. **Due 10th of February 2023.**

### **Organisational Chart**

No organisational chart was provided for this audit, however, the environmental responsibilities of WPGL's employees is detailed within the EMS Manual. The environmental management on a Welsh Power site is headed by the Environmental Analyst who is accountable to the Chief Executive Officer. Welsh Power state that they recognise the environment is everyone's responsibility with all managers and employees responsible for the environmental performance. They ensure adherence to all process specifications, inspection, test or other control procedures. The dedicated Environmental Analyst role within the organisation is "to actively advise and assist the directors and managers on all environmental matters to ensure compliance at all times. The Environmental Analyst is designated responsibility by the (CEO) to plan, manage, monitor and coordinate environmental performance at all levels". A list of their responsibilities is detailed within the EMS Manual. There are also obligations for both employees and visitors with regards to health, safety and environment with all employees being responsible for cooperating with WPGL in fulfilling its obligations and implementation of the HSEQ management system.

### **Air emissions**

ECL Emissions monitoring reports were provided for all sites. These were reviewed and found to be within compliance limits stated within the Medium Combustion Plant Regulations. However, these limits are currently not in force.

### **Competence**

WPGL provided details on the competence of their senior management. This has been determined satisfactory.

### **Documentation**

The documentation provided was found to kept up to date with review dates within 2022.

### **Standard Operating Procedures**

Waste Management Procedure document number WP-ENVOC-001 Waste 20220204bGJ

WPGL may want to consider adding a section pertaining to following the Waste Hierarchy. The Waste Hierarchy must be initially considered when deciding what the best option is to manage a waste stream. This is a mandatory requirement of the Waste (England & Wales) Regulations 2011. It places more emphasis on waste prevention, and requires organisations to consider preparing waste for reuse, then opportunities for



recycling, before options such as energy recovery. By law, operators need to apply the Waste Hierarchy to ensure they minimise the impacts of their waste activities.

Emergency Response Plan (ERP) document number (all sites)

In the event of a fire at the site which has the potential to result in fire water entering the local surface water drains and/or unprotected ground, NRW would expect an operator to call their incident communication centre as soon as possible so that an officer can attend or advise on protecting the environment. Please update this procedure to include this.

***Conclusion to Desk Based Assessment of EMS Documentation***

The objectives of this audit were to establish the existence of a management system that ensures permit conditions are complied with and the needs of the permit are delivered. It was also to assess WPGL's ability to ensure applicable statutory and regulatory requirements are met and to identify where applicable, areas for potential improvement. Upon review, WPGL have a well-established EMS that appears to encompass all the pertinent areas one would expect to see in an EMS. NRW are pleased to observe that the documents provided show that the operator has good systems and procedures in place to implement, review, plan and act on the EMS. This has led to a good record of environmental performance and continued demonstration that the system is fit for purpose.

Please note the actions above and recommendations.

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                                                                                                                 |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| C1 Major                   | Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property |
| C2 Significant             | Potential to have a significant impact or effect on the environment, people and/or property                                 |
| C3 Minor                   | Potential to have a minor or minimal impact or effect on the environment, people and/or property                            |
| C4 No environmental impact | Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property       |

**Full list of Industry and Waste action criteria (used in section 1 and 2):****A: Permitted activities**

- A1 Specified by permit

**B: Infrastructure**

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

**C: General management**

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

**D: Incident management**

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

**E: Emissions**

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

**F: Amenity**

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

**G: Monitoring and records, maintenance and reporting**

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

**H: Resources efficiency**

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

**Enforcement response**

Any permit condition non-compliance 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 20 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 – 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.