



Environmental Risk Assessment

Department:

Permitting

Activity / Process:

Deployment: Spreading Washwater to Land 10 02 26

RA Ref:

RA.Permitting.001

Assessment Type <i>(Highlight applicable)</i> :	Generic	Specific	Dynamic	Issue No:	Rev1
Job / Title	Name	Position	Signature	Date	
Assessor:	Jack Davies	Field Services Agronomist		12/02/2026	
Line Manager:	Stephen Mathias	Head of Field Services		12/02/2026	
H&S Review:	Richard Kplomodo	Health and Safety Manager		12/02/2026	
External Review:	Joe Gatley	External Environmental Consultant		12/02/2026	

Risk Assessment to be reviewed in accordance with Note No 5. Record any reviews NOT requiring revision / reissue below:

Review Date	Revision Required	Name	Signature	Review Date	Revision Required	Name	Signature
	Y / N				Y / N		
	Y / N				Y / N		
	Y / N				Y / N		

Cross Reference Related Documents (☒ where required): **Permit Applications:** ☒ **Permit to Work** ☒ **Hot Work Permit** ☐ **Confined Space Permit** ☐

Isolation LOTO: ☐ **Lift Plan:** ☐ **Drawings:** ☐ **Other:** ☐

Personal Protective Equipment (PPE) Required *(please tick required equipment)*:

Head	Eye *	Hearing	Respiratory Protection *	Fall Protection *
 Safety Helmet Bump Cap	 Glasses Goggles Visor	 Ear Defenders or Ear Plugs	 Dust Mask Gas Mask	 Harness Lanyard Inertia Block
Foot	Hand *	Hi-viz	Clothing	Other:
 Boots Wellingtons Waders	 Gloves	 Hi-Viz Vest or Hi-Viz Coat	 Waterproofs Coveralls	

* Please identify specific type e.g. disposable FFP3 dust mask or fixed fall restraint lanyard, etc.

Hearing protection to be worn when machinery is operational.



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Hazard	Source	Pathway	Receptor	Risk Rating Pre Control			Control Measures	Residual Risk Rating			Responsibility
				L	C	R		L	C	R	
Odour from Spreading Waste water	Waste Washwaters	Wind drift carrying odour	Residents On site Bungalow situated North, East South and West, 12 metres East from nearest spreading Areas. Neighbouring Farms and Dwellings situated downwind of spreading operations within 1 Km.	2	1	2	Odour Assessment & Checks carried out by odour panel staff prior to deployment. See attached Odour Assessment & Recording Form. Monitoring shows that the heavily diluted wastewaters have a very weak or feint odour. - See Appendix - 1. Map of Site, Fields, Sensitive Receptors & Locations Data - Rev0.	1	1	1	Facilities Manager Field Services Assistant Odour Panel Machine Operator
Noise	Machinery	Prevailing Wind	On site dwelling, work force / operator(s) and Neighbouring residents and farms.	3	2	6	- Maintenance regime in place. - Equipment and silencer checks. - Hours of operations are limited to 08.00 to 18.00.	1	2	2	Machine Operator
Surface Run off	Spreading of wastewater	Overland run off into streams and ditches / water courses	Two brooks on the East & west of the property, and; Ancient Lowland Woods, as identified on Location and Receptor Plans in Appendix - 1	3	3	9	- No spreading operations within >50m of springs or surface water streams. - No Spread buffers marked in Red on map, See Appendix - 1. Map of Site, Fields, Sensitive Receptors & Locations Data - Rev0. - Do not spread when soil is saturated. - Spread fields in rotation to avoid soil saturation. - Sloping land is excluded on Deployments see spreading areas in Appendix – 1. - Spreading is not to be carried out during High Winds > Beaufort Scale 4. - Weather conditions monitored, see Agricultural Benefit Statement, Section 2.0 - Contingency Planning.	2	3	6	Facilities Manager Field Services Assistant Machine Operator



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Hazard	Source	Pathway	Receptor	Risk Rating			Control Measures	Residual Risk Rating			Responsibility
				L	C	R		L	C	R	
Soil Compaction	Agricultural machinery	Excess trafficking	Ponding and run-off of washwaters into Surface waters and Ancient Lowland Woods	2	2	4	- Do not track on same roadways. - Do not spread when soil is saturated. - Spread fields in rotation to avoid soil saturation.	1	2	2	Machine Operator
Contamination of Water Course	Spreading of excess wastewater	Ponding and Surface Run off / leaching	Stream to Millin Brook to the South East and Millin Brook to the South West of Farm. Milford Haven Waterway, SSSI, Located approximately 1.1Km South of the Site	3	4	12	- Do not spread within No Spread buffers marked in Red on map. - Do not spread when soil is saturated. - Spread fields in rotation to avoid soil saturation. - See Appendix - 1. Map of Site, Fields, Sensitive Receptors & Locations Data - Rev0.	1	4	4	Facilities Manager Field Services Assistant Machine Operator
Impact to Sensitive Receptors	Uncontrolled or excess spreading of wastewater	Surface Run off / leaching	Ancient Lowland Woods, Hedgerows, Surface waters as identified on Location and Receptor Plans in Appendix – 1 Groundwater - (Fields are not within a Source Protection Zone or Nitrate Vulnerable Zone)	3	4	12	- No spreading operations within >50m of springs or surface water streams. - No Spread buffers marked in Red on map, See Appendix - 1. Map of Site, Fields, Sensitive Receptors & Locations Data - Rev0. - No spreading when soil is saturated - Spread fields in rotation to avoid soil saturation. - Maintain 10m Buffer zones from Hedge rows. - Maintain 50 m from Farm Yard non-drinking water Borehole.	1	4	4	Facilities Manager Field Services Assistant Machine Operator
Nutrient loadings	Waste water	Processing Operations	Soils, Fields, Crops	2	4	8	- Continual testing of wastewater in house and 3rd. Party. - Soil analysis testing. - Spreading in Rotation. - see Agricultural Benefit Statement.	1	4	4	Facilities Manager Field Services Assistant Pembrokeshire Creamery Technical Lab.
Contamination of Ground)	Machinery Refilling	Surface Run Off	Hedgerows, streams, woodland, borehole, soil & groundwater (not within SPZ or NVZ)	2	4	8	- Refuel in designated containment area, - Ready available spill kits on site - H&S Spillage Training for Operator(s)	1	4	4	Machine Operator



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RISK MATRIX Risk (R) = Likelihood (L) x Consequence (C)			CONSEQUENCE				
			Negligible / No Environmental or no consequence	Low / Minor Environmental or consequence	Moderate / Serious Environmental or consequence	Major / Significant Environmental or consequence	Catastrophic Environmental or consequence
			1	2	3	4	5
LIKELIHOOD	Frequent / definite	5	5	10	15	20	25
	Highly likely	4	4	8	12	16	20
	Moderate / occasional	3	3	6	9	12	15
	Low / remote chance	2	2	4	6	8	10
	Improbable / negligible / rare	1	1	2	3	4	5
STOP		15 - 25	Stop activity and action immediately. Review / revise control measures, consider alternative ways of working.				
Urgent Action		8 - 12	Review control measures and improve if reasonably practicable to do so, consider alternative ways of working. Controls to be adhered to.				
Action		3 - 6	Look to improve at next review or if there is any significant change, but ensure controls are maintained and reviewed.				
No Action		1 - 2	No further action, but ensure controls are maintained and reviewed				

Notes:

- If using a 'Generic' risk assessment, Assessors and Line Managers are to satisfy themselves that the assessment is valid for the task and that all significant hazards have been identified and assessed. If additional hazards are identified they are to be recorded and either added to the Generic assessment or a new Specific Assessment is to be written.
- Line Managers are to note that they are responsible for production of the risk assessment and that they are signing to indicate that the risk assessment is suitable and sufficient and they consider the risks to be acceptable.
- Ensure that the appropriate specific type of PPE is identified for the task. PPE must only be considered as and when other control measures such as guarding, local exhaust extraction, preventing noise at source, eliminating the need to work at height, etc. are not possible. PPE should always be considered as a last resort option. PPE should only be worn when there is reasonable justification for doing so.
- Risk Rating is the Likelihood score multiplied by the Consequence score. Calculate the initial Risk Rating and then ensure that appropriate controls are in place to ensure that the Residual Risk Rating has been reduced to an acceptable level.
- Risk Assessments are to be reviewed:
 - Annually
 - If "Generic" prior to use
 - If there is reason to doubt the effectiveness of the assessment
 - Following an accident or near miss
 - Following significant changes to the task, process, procedure or Line Management
 - Following the introduction of more vulnerable personnel



Odour Assessment for Assessing the Suitability of Wastes Prior to Land Spreading Deployment Applications & Operations

1. Purpose & Aims

This **Odour Assessment** has been produced for **Puffin Produce Limited** to support their **Waste Recovery Operations** and subsequent **Landspreading Deployment Applications**. This Assessment aims to ensure that the waste to be utilised will not possess, or be capable of causing unacceptable or offensive odours prior to, during or after Landspreading Deployment Operations.

2. Waste Characterisation

2.1 Processes Generating the Waste

The waste is generated from **rinsing empty milk silos** with **mains water** that have previously used for storing **pasteurised milk for human consumption**.

These washwaters are generated at their Factory in Haverfordwest are then transferred to the on-site storage tank, pending recovery for utilising in landspreading.

2.2 Waste Classification

- **LoW Code:** 020501 biodegradable materials unsuitable for consumption or processing.
- **Waste List Status:** Absolute non-hazardous waste
- **SR 2010 No4 Permit:** Table 2.2B Waste Types – List B wastes
- **Nature and Physical State:** Aqueous Liquid
- **Waste Analysis:** See **Appendix 2 – Waste Washwater Analysis**

3. Samples

Regular 500ml daily samples of the washwaters are taken from the washing lines and storage tank which are then also aggregated to form bulk weekly samples. Each sample taken for odour assessment is individually numbered & dated, samples are kept within lidded/sealed containers with approximately 50% air space to allow for any potential. bacterial degradation and odour generation. Samples taken for odour assessment are stored in 2 separate locations for 2 varying temperatures, these are 1. Outside External Storage for seasonal variable atmospheric temperatures, and, 2. Inside the premises at constant room temperature (20°C).

4. Olfactory Testing and Recording

An **Odour Panel** consisting of 5 unbiased people within company and who are not familiar with the smell or handles the waste (i.e. office staff or external off-site staff), carry out the Olfactory Checks (Sniff Test). A record is of the Samples, Date, Temp, Findings etc. is recorded by each member of the panel.

Records of the Samples and Olfactory Checks are provided in the **Odour Record Form** ↗

Odour Record Form

Olfactory (Sniff) Tests and Checks

Key					Olfactory Descriptors & Parameters:				Odour Panel Member
Test Sample Details:					A scale ranking perceived strength from "very faint" to "extremely strong"	A score ranging from very pleasant (+4) to very unpleasant (-4)	e.g. Sweet, fruity, sour, "chemical, rotten eggs, etc.	Other Comments	
Test Date	Sample ID / No.	Sample Date	Sample Storage Location	Sample Temp °C	Odour Intensity	Hedonic Tone	Description of Flavour / Aroma	Additional Notes?	Checker ID / Initial
3/2/26	DAF PLANT	3/2/26	DAF		Very faint	+3	Very slight smell of milk	—	J.M.
4/2/26	" "	4/2/26	" "		" "	+4	Slightly of Milk	—	J.D.
5.02.2026	DAF PLANT				Very faint	+3	very faint milk smell	—	Jm
6.02.2026	DAF PLANT	6.02.2026	DAF		very faint	+3	Slight smell of milk	—	Wagdy
5.02.26	DAF PLANT	5.02.26	DAF		Very faint	+3	Small milk smell	—	Wagdy
6/02/26.	DAF PLANT	6/2/26.	DAF-Can		No smell.	+4.	No odor.	—	Reli
9/2/2026	DAF	09/02/26	REL DAF.		odorless.	+4.	Can't smell anything	—	J.D.

Test Date	Sample ID / No.	Sample Date	Sample Storage Location	Sample Temp °C	Odour Intensity	Hedonic Tone	Description of Flavour / Aroma	Additional Notes?	Checker ID / Initial
11/2/26	DAF	11/2/26			No odour	0	No odour	—	JD
14/2/26	DAF Plant	14/2/26			NO smell	0	NO smell		WR
15/2/26	DAF PLANT	15/2/26			NO smell	0	NO smell	—	JD
17-2-26	DAF PLANT	17-2-26			No odour	0	No odour	—	JD
" "	" "	" "			" "	0	" "	—	JD
20/2/26	DAF.	20/2/26			Slight odour	1	Slight odour Did not smell back	—	Pell
28/2/26	DAF Plant	28/2/26			No odour	0	No odour		WR
5-3-26	DAF PLANT	5-3-26			Faint odour	+1	Slight smell of Milk.	—	JD
9/3/26	DAF	9/3/26			No odour	0	Nothing		Peta L.
12-3-26	DAF Plant	12-3-26			No odour	0	No smell	—	WR
18-3-26	DAF	18-3-26			No smell	0	No smell	—	JD

Test Date	Sample ID / No.	Sample Date	Sample Storage Location	Sample Temp °C	Odour Intensity	Hedonic Tone	Description of Flavour / Aroma	Additional Notes?	Checker ID / Initial
31-3-26	—	31-3-26			Slightly Milky	1	Slight smell of Milk	—	W
4-3-26	—	4-3-26			No Smell	0	No smell	—	MC
7-4-26	✓	7-4-26			No smell	0	No smell	—	W
08-04-26	✓	08-04-26			No smell	0	No smell	—	Am
10-04-26	✓	10-04-26			No smell	0	No smell	✓	Am
14-4-26	—	14-4-26			No Smell	0	No smell	—	W