

Final v1

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# Pembrokeshire County Council Waste Transfer Station



Pest Management Plan (U41EMS.S5.07)

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**Written by:** SLR Consulting Ltd



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# Acknowledgements

The content of this Report has been based upon information provided by WRAP Cymru and Pembrokeshire County Council.

## 1.0 Introduction

The Pest Management Plan (PMP) has been prepared to support the Environmental Permit (EP) variation application for Pembrokeshire County Council's (PCC) Waste Transfer Station (WTS) at The Dockyard, Pembroke Dock, Pembrokeshire, SA72 6TD, hereafter referred to as 'the Site'.

This PMP outlines the methods by which PCC will systematically assess, reduce and prevent a potential infestation of pests at the WTS during normal operation and during potential abnormal events.

### 1.1 Relevant Guidance

This PMP has been written in accordance with the following guidance:

- Technical Guidance Document: How to comply with your environmental permit, Version 8, October 2014;
- Control and monitoring emissions for your environmental permit, November 2018; and
- Fly management: how to comply with your environmental permit, Version 1, April 2013.

### 1.2 Pest Management Plan Structure

This PMP aims to cover the following 6 points:

- Training;
- Monitoring;
- Pest prevention methods;
- Pest control techniques;
- Trigger level for additional control measures to be required; and
- Review of the PMP.

### 1.3 Responsibility

The Site Manager is responsible for ensuring the PMP is kept up to date and implemented correctly on site. Any changes required are the responsibility of the Site Manager or other designated person to update and re-issue the amended plan.

## 2.0 Training

Andrew Wood, the Site Manager, has a COTC Level 4 Transfer and Treatment of Hazardous Waste with WAMITAB. Peter Harts also undertakes the two yearly Continuing Technical Competency renewals. Other competency cover is provided by Peter Harts with the same level of qualification, and Anna Smith currently holds a Level 3 qualification but is completing her Level 4 training.

The Site Manager will ensure that all relevant training is cascaded down to all other site operatives via a Toolbox Talk. The training will include the following (list not exhaustive):

- Understanding the significance of pests on site;
- Basic identification of flies based on the information contained in Appendix 01;
- On-site inspection techniques;
- Where and how to record any findings;
- Who to report any significant findings to and by what means;
- Waste rejection procedures; and
- Any relevant control techniques.

Toolbox talks are undertaken once per quarter and are provided to any new members of staff before they begin work on site.

### 2.1 In-House Pest Control Team

PCC benefit from the presence of an in-house pest control team. All officers are qualified and certified by the Royal Society of Public Health and have achieved the Level 2 Award in Pest Management.

### 3.0 Monitoring

All pests usually have predictable behaviour patterns (food types, habitats, and breeding).

Typical species that could be present on site and will be inspected for are as follows.

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**Table 3-1:** Typical Pest Species on Site

Pest	Possible Species
Fly	<ul style="list-style-type: none"><li>■ Common Housefly</li><li>■ Lesser Housefly;</li><li>■ Blow Flies; and</li><li>■ Fruit Flies.</li></ul>
Vermin	<ul style="list-style-type: none"><li>■ Rodents;</li><li>■ Pigeons; and</li><li>■ Seagulls.</li></ul>

The occurrence of pests will be monitored, and findings recorded to enable the instigation of appropriate control measures. This will be carried out on a daily basis and will be carried out more than once per day if increased pest activity is noted.

#### 3.1 Fly Monitoring

All site staff will be required to:

- Remain continuously vigilant for signs of maggots, crawling flies and airborne insects during waste acceptance. Each load will be visually inspected when tipped for the signs of flies/maggots/larvae;
- Verbally report any sightings to the Site Manager; and
- Record any findings in the Site diary.

In addition, general observations will be made by the Site Manager (or suitably trained delegated persons) as part of the daily site inspections using the Daily Site Monitoring and Evaluation sheet (U41EMS.S8.05) found in Appendix 02. Each storage bay within all units will be visually inspected. Furthermore, the in-house pest control team conduct an inspection on a monthly basis.

If any sightings are recorded, adhesive fly paper will be used in the building to monitor fly numbers. The fly paper will be replaced weekly and any flies will be identified and counted. Trigger levels are shown in Table 3-2 below.

The level of infestation is measured using the traffic light system methods documented in Table 3-2 below.

**Table 3-2: Traffic Light System for Fly Monitoring**

<b>Classification</b>	<b>Assessment Criteria</b>	<b>Action to be Considered</b>
Normal	No airborne flies, maggots or crawling flies noted during daily inspections 0-1 flies on sticky board (if applicable – may not be in place)	None required
Light	1 – 25 airborne flies within WTS 1-50 maggots apparent within in coming load 1 – 25 crawling flies noted on waste face 2-10 flies on sticky board	If not already in place, put up adhesive fly paper in building(s) where flies, maggots or crawling flies were seen during daily inspections. If not already in place, put up adhesive fly boards on the site boundary (location to be determined by the in-house pest control team). Monitor adhesive fly paper/boards on a weekly basis. Keep roller shutter doors closed as much as operationally possible. Target specific waste if identified as problem load with treatment (removal of fly infested waste to the quarantine area for targeted use of insecticide). Monitor fly numbers Site Manager to contact the in-house pest control team.
Medium	26 – 50 airborne flies within WTS 51-100 maggots apparent within in coming load/ onsite waste 26 – 50 crawling flies noted on waste face 11-25 flies on sticky board	If not already in place, put up adhesive fly paper in building(s) where flies, maggots or crawling flies were seen during daily inspections. If not already in place, put up adhesive fly boards on the site boundary (location to be determined by the in-house pest control team). Monitor adhesive fly paper/boards on a daily basis. Keep roller shutter doors closed as much as operationally possible Target specific waste if identified as problem load with treatment (removal of fly infested waste to the quarantine area for targeted use of insecticide). Remove waste from site Monitor fly numbers Site Manager to contact the in-house pest control team.
Heavy	> 50 airborne flies within WTS Flies within the yard > 100 maggots apparent in waste > 50 crawling flies noted on waste face > 26 flies on sticky board	If not already in place, put up adhesive fly paper in building(s) where flies, maggots or crawling flies were seen during daily inspections. If not already in place, put up adhesive fly boards on the site boundary (location to be determined by the in-house pest control team). Monitor adhesive fly paper/boards on a daily basis. Keep roller shutter doors closed as much as operationally possible Cease taking waste Remove waste from site Full clean down of transfer station

		Monitor fly numbers Site Manager to contact the in-house pest control team.
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U41EMS.S8.05 will be used in conjunction with this PMP to record whether fly numbers are considered compliant (fall within the normal classification in Table 3-2 above). Any findings outside the normal classification will be recorded on U41EMS.S8.05 which is reviewed by the Site Manager daily.

The results of the inspections will be held on site for review and audit purposes and will be made available to NRW on request.

### 3.2 Vermin Monitoring

All site staff will be required to:

- Remain continuously vigilant for signs of rats, pigeons or seagulls anywhere on site;
- Verbally report any sightings to the Site Manager; and
- Record any findings in the site diary.

During daily site inspections made by the Site Manager (or suitably trained delegated persons) using U41EMS.S8.05, any sightings of rats, pigeons or seagulls within the buildings will be recorded. Control techniques for any vermin monitored on site are detailed in Section 5 below.



#### 4.0 Pest Prevention Methods

A risk assessment identifying the possible sources of pests, pathways and receptors has been undertaken and is presented in Table 4-1 below. The assessment details the preventative pest control measures implemented on site that aim to prevent or minimise the presence of pests.

**Table 4-1:** Pest Management Risk Assessment

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk what do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? – Who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
<b>Pests</b>						
<p>Flies including:</p> <ul style="list-style-type: none"> <li>■ Common Housefly;</li> <li>■ Lesser Housefly;</li> <li>■ Blow fly; and</li> <li>■ Fruit fly.</li> </ul> <p>Vermin including:</p> <ul style="list-style-type: none"> <li>■ Rodents;</li> </ul>	<p>Potentially sensitive receptors including residential properties within Pembroke Dock, businesses within the Dockyard, South Pembrokeshire Hospital, Surehaven Pembroke</p>	<p>Via air (flies, pigeons and seagulls) or over ground (rats).</p>	<p><b><u>Low Potential to Attract Pests</u></b></p> <p>The following waste types are not considered to attract pests:</p> <ul style="list-style-type: none"> <li>■ Dry mixed recyclate including orange bag waste;</li> <li>■ Loose or baled paper and cardboard;</li> <li>■ Textiles;</li> <li>■ Batteries; and</li> <li>■ Waste Electrical and Electronic Equipment (WEEE).</li> </ul> <p>These waste types do not contain any putrescible material.</p>	Low	Nuisance, loss of amenity and harm to human health.	Low

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk what do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? – Who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
<ul style="list-style-type: none"> <li>■ Pigeons; and</li> <li>■ Seagulls.</li> </ul>	Hospital, South Pembrokeshire Golf Course, ecological receptors and local cultural and heritage features.		<p>All wastes are separated at the kerbside by trained operatives ensuring negligible levels of contamination and mixing of wastes types.</p> <p>Strict waste acceptance procedures will ensure that only authorised wastes are accepted.</p> <p>Wastes are stored on site for a maximum of 1 week (more likely to be 1 day) with the exception of batteries and WEEE that could be stored for up to 3 months.</p> <p>Control measures for these waste types are not considered necessary.</p>			
			<p><b><u>Medium Potential to Attract Pests</u></b></p> <ul style="list-style-type: none"> <li>■ Loose or baled cans, plastic, composite packaging;</li> <li>■ Bulky waste; and</li> <li>■ Street Cleaning Residues.</li> </ul> <p>The above waste types are considered to have a medium risk of attracting pests due to the likelihood of a small proportion of putrescible material. Large quantities of food/green waste should not be present as</p>	Medium	Nuisance, loss of amenity and harm to human health.	Medium

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk what do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? – Who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
			<p>this is collected separately. Therefore, the following control measures are implemented:</p> <ul style="list-style-type: none"> <li>■ Waste acceptance procedures will ensure that only authorised wastes are accepted;</li> <li>■ If a load arrives at the site emitting an unacceptable odour or has a fly infestation, it will be rejected, and logged in the site diary for future reference;</li> <li>■ Waste tipped on the floor of the WTS will be kept to an operational minimum. Once tipped, waste will be pushed up into the storage bays and the tipping areas will be swept and washed down as required to leave a tidy working area at the end of the working day;</li> <li>■ A minimum amount of waste will be allowed to remain within the WTS at the end of each working day or over weekends;</li> <li>■ Wastes will be stored on site for a maximum of 1 week (more likely to be 1 day);</li> <li>■ All waste will be stored within a building;</li> </ul>			

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk what do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? – Who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
			<ul style="list-style-type: none"> <li>■ Good housekeeping practices will be in place. Spillages and accumulations of waste will be cleaned up as soon as possible, including difficult to reach areas, ensuring waste does not accumulate in corners;</li> <li>■ As detailed in Sections 2 and 3 above, Site operatives will be trained in the identification of pests and will be vigilant and undertake a daily inspection for sightings of birds, rats and flies. The findings of the visual inspection will be recorded in the site diary;</li> <li>■ In the event that flies are identified at the site, the actions detailed in Table 3-2 above will be considered and the appropriate course of action decided by the Site Manager; and</li> <li>■ If rats or birds are identified on site, the actions detailed in Section 5 will be considered and the</li> </ul>			

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk what do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? – Who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
			appropriate course of action decided by the Site Manager.			
			<p><b><u>High Potential to Attract Pests</u></b></p> <p>The following waste types are considered to have a high risk of attracting birds, rats and flies due to the proportion of putrescible material and moisture levels. Therefore, these waste types have extra control measures in addition to the measures listed above:</p> <ul style="list-style-type: none"> <li>■ Food Waste.</li> </ul> <p>To minimise the potential for infestations, food waste will arrive on site in RRV pods/stillages or trade waste vehicles and will be tipped directly into artic containers sealed at the bottom and sides within Unit 41 (or into a designated food waste bay which will then be loaded into the same artic container within 1 hour). Each food trailer will remain on site for approximately 24-48 hours.</p> <ul style="list-style-type: none"> <li>■ Absorbent Hygiene Products (AHPs).</li> </ul>	High	Nuisance, loss of amenity and harm to human health.	High

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk what do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? – Who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
			<p>AHPs will be collected in bags, tipped on the floor in a designated bay and then placed within a skip that is fully sealed at the bottom and sides. AHPs will only remain on the floor for a maximum of 1 hour. AHPs will be transported off site for recycling within 7 days.</p> <ul style="list-style-type: none"> <li>■ Mixed Municipal Waste</li> </ul> <p>Mixed municipal waste is not treated on site and remains within sealed bags at all times.</p>			

## 5.0 Pest Control Techniques

### 5.1 Fly Control Techniques

Table 3-2 above details the different control techniques that will be considered depending on the severity of the infestation. Techniques could be deployed in-situ to a large-scale fly problem or targeted to small proportions of waste if it can be removed from the wider pile and isolated within the quarantine area. The table describes the different thresholds that would trigger additional control techniques that will need to be implemented.

The Site Manager will make contact with the in-house pest control team who will determine the most appropriate course of action. Likely pest control techniques will include the following (list not exhaustive):

- 'Paint on' insecticide formula;
- Insecticide space treatment (fogging spray); and
- Ultra Low Volume System (ULV).

Any use of insecticides will be undertaken by the trained in-house pest control team. All relevant Health and Safety Executive (HSE) approvals and assessments will be undertaken.

As checks and monitoring of pests is undertaken daily, any control measures required will be implemented within the same day.

### 5.2 Rodent Control Techniques

Rodent control will be achieved via the use of approved rodenticides deployed in bait boxes. All use of rodenticides will be undertaken in line with the following guidance:

- Campaign for Responsible Rodenticide Use (CRRU) UK Code of Practice: Best Practice and Guidance for Rodent Control and the Safe Use of Rodenticides – March 2015; and
- CRRU Guidance: Permanent Baiting – July 2019.

Permanent baiting site locations will be identified; however, these will not contain active rodenticides unless it can be demonstrated that there is an ongoing rodent related problem. If this is established, active rodenticide will be used until the issue is resolved. Checks of the bait boxes by the in-house pest control team will be undertaken bi-monthly.

### 5.3 Bird Control Techniques

The likelihood of an infestation of pigeons or seagulls is considered to be extremely low as the building doors remain closed outside of operational hours and there is a constant human presence on site during operational hours.

Techniques for bird abatement that could be considered by the in-house pest control team/suitably qualified individual are:

- Pre-recorded bird distress calls;
- Bird kites which mimic birds of prey;
- Helium balloons;
- Birds of prey; and
- Scarecrows.

Selection of the most appropriate technique(s) are dependent upon a number of factors e.g. preference will be given to passive techniques to minimise disturbance to neighbours. Consideration will be given to the presence of protected bird species in the vicinity of the facility, prior to utilising falconry/birds of prey. Techniques can also be rendered ineffective due to habituation and therefore a combination of different techniques will be used to ensure their individual effectiveness.



## 6.0 Trigger Levels and Complaints

### 6.1 Fly Monitoring Trigger Levels

Trigger levels for control levels are detailed in Table 3-2 above.

### 6.2 Vermin Monitoring Trigger Levels

If any rats, pigeons or seagulls are observed within Unit 41, 29 or 29A, the specialist pest control contractor will be called immediately.

### 6.3 Complaints

Any complaints related to pests will be handled in accordance with the Complaints Procedure (U41EMS.S2.06) included as Appendix 03 and recorded on the Complaints Record Form (U41EMS.S2.07) included as Appendix 04.

#### 6.3.1 Complaints Regarding Flies

In step 5 of the Complaints Procedure it is necessary to determine that the WTS is the source of flies at the complainant's address. To do this, the following will be investigated.

- The species of the fly found at the complainants address to determine if it is the same as any flies found on site;
- Whether there is evidence of breeding of the same species of fly at the WTS;
- If there are any other significant sources of the same species of fly near to the site; and
- If changes in fly numbers at the site (for example due to a particular load of waste being delivered) are mirrored at the complainant's address.

Step 5 of the Complaints Procedure also requires the source of the complaint to be investigated if it is attributed to the WTS. The following measures will be used to investigate the complaint.

- Check the site for the presence of adult flies and take dated photographs of any key issues seen;
- Examine the waste for fly larvae;
- Check any sticky boards for number and species of fly; and
- Check that there is no old waste stuck between building walls and bays or in corners.

## **7.0 Review of the Pest Management Plan**

This PMP sets out the appropriate measures PCC will undertake in order to maintain good housekeeping practices with the aim of minimising the risk of pests from the operations. A review will be carried out to ensure the plan remains suitable and sufficient to meet the needs of the facility.

The review will be carried out on an annual basis or because of any of the following activities (list not exhaustive):

- The issue of an EP variation by the NRW;
- A material change to the operational process;
- A substantiated complaint; or
- Any changes in legislation or guidance documents applicable to the pest management at the WTS.

Following such a review should the document be updated, a revised draft of the plan will be submitted to NRW for discussion, consideration and approval.

# Appendix 01: Pictures and Description of Common Fly Types

(Taken from: Fly management: how to comply with your environmental permit, Version 1, April 2013)

Common Housefly  
(*Musca domestica*)



Lesser Housefly  
(*Fannia canicularis*)



Stable fly  
(*Stomoxys calcitrans*)



Black dump fly  
(*Hydrotaea aenescens*)



Cluster fly  
(*Pollenia rudis*)



Blowflies:

Blue bottle  
(*Calliphora* sp.)



Green bottle  
(*Lucilia* sp.)





Larvae of common housefly in wet manure (larvae of blowflies appear similar) (Copyright C. Boase)



Pupae of common housefly in dry manure (pupae of blowflies appear similar) (Copyright C. Boase)



Pupae of lesser housefly (larvae appear similar) (Copyright C. Boase)



Stage	Feature	Common housefly ( <i>Musca domestica</i> )	Lesser housefly ( <i>Fannia canicularis</i> )
Adult	Size:	Typically 6-7mm long, but does vary.	Typically 4-6 mm long, but does vary.
	Pattern on dorsal surface of thorax:	Four distinct longitudinal dark lines.	Three indistinct longitudinal dark lines.
	Abdomen colour:	Yellow-ish at basal end.	Often yellow-ish along sides.
	Wing venation:	Fourth longitudinal vein bends forwards (see below).	Fourth longitudinal vein straight (see below).
	Position of wings when at rest:	Projecting out from the sides of the abdomen, giving a delta-shaped outline.	Folded one over the other, directly over the abdomen, giving a more parallel sided outline.
	Adult resting behaviour	Typically resting in numbers on a range of surfaces within the building, e.g. walls, posts, ceiling etc. Sometimes in large clusters in preferred places.	Even when abundant, tends not to rest in numbers on walls or ceilings. More often resting on the manure, or on surfaces very close to the manure.
	Flight behaviour at source:	Flies very readily and in numbers. Often alighting on or colliding with people within the building.	Even within poultry sheds, the numbers of flies on the wing is low. Males flight is typically jerky circling high up within the building. Very seldom alighting on people.
	Flight behaviour at complainants' premises:	CHF will continually alight on work surfaces, food, walls, cupboards and people.	LHF normally flies in jerky circles within the room, often high up and around hanging objects occasionally alighting on light shades or pelmets etc. It seldom alights on people or food.
Larva	Appearance:	White-ish, smooth, maggot appearance. Active wriggling behaviour, often in clumps, just beneath manure surface. Normally in wetter manure. Easy to see when manure disturbed.	Dull grey-brown, spiky exterior. Inactive, and seldom clumped. Normally in wetter manure. Needs careful and close examination of the manure to find them.
Pupa	Appearance:	Smooth, barrel shaped, from tan, through chestnut-brown to almost black in colour, depending on maturity. Normally in drier manure. Easy to find. (See below)	Dull grey-brown, spiky exterior. Normally in drier manure. Needs careful and close examination of the manure to find them. (See below)
Issue		Common housefly ( <i>Musca domestica</i> )	Lesser housefly ( <i>Fannia canicularis</i> )

Overwintering behaviour	<p>This species cannot hibernate. It can only overwinter in warm locations, e.g. in pig farrowing units, or intensive poultry layer sites, where it continues breeding.</p> <p>Flies at cooler sites, e.g. free-range poultry units, will die out each winter, and so have to be re-colonised each spring, hence CHF problems in such sites, if they occur, are often later in the summer.</p>	<p>At the onset of winter, LHF will hibernate at the pupal stage, within the manure. These pupae will hatch the following spring, with the onset of warmer weather. Manure removal in the winter will take out most of the infestation.</p>
Dispersal behaviour	<p>Some adult flies will leave the source and may cause nuisance in buildings up to two or more km away. Dispersing flies are not obvious in intervening areas.</p>	<p>Some adult flies will leave the source and may cause nuisance in buildings up to two or more km away. Dispersing flies are not obvious in intervening areas.</p>
Typical breeding sites	<ul style="list-style-type: none"> <li>- Intensive poultry layer units.</li> <li>- Free-range poultry layer units (less commonly).</li> <li>- Pig units.</li> <li>- Waste bins.</li> <li>- Waste transfer stations.</li> <li>- Landfill sites.</li> </ul>	<ul style="list-style-type: none"> <li>- Free-range poultry layer units.</li> <li>- Waste bins.</li> <li>- Waste transfer stations.</li> <li>- Landfill sites.</li> </ul>

## Appendix 02: Daily Site Monitoring and Evaluation sheet (U41EMS.S8.05)



**Date and Time:**

**Assessor:**

**Weather Conditions:**

Inspection Areas	Compliant		Comments
	Yes	No	
Access Road			
Internal Roads			
Site Gate/Barrier			
Boundary Fencing			
Weighbridge			
Site Signage			
Identity Board			
Fire Extinguishers			
Safety Notice			
First Aid box			
PPE provision			
Use of PPE			
Accident book review			
Maintenance of records in weighbridge			
Condition of Roads			
Windblown litter control			
General waste tipping operations			
Availability of site machinery/operatives			
Fires			
Flies/Vermin/Birds (Refer to Pest Management Plan (U41EMS.S5.07 – Section 3) for details of what to inspect.			
Odours			
Dust			
General site tidiness			
Surface drainage			
Lighting			
Complaints			
Regulatory Communication			
Visitors on site			

**END OF DOCUMENT**

## Appendix 03: Complaints Procedure (EMS.S2.06)

## **1.0 PRINCIPLE**

This section outlines the procedure upon receiving a complaint regarding units 29, 29a and 41. The purpose of this written procedure is to ensure that all site operatives working on site are aware of the procedures for the correct recording of a complaint.

## **2.0 RESPONSIBILITY**

All site operatives are responsible for carrying out the procedure as detailed in Section 0. Any changes to the procedure required are the responsibility of the Site Manager to update and re-issue the amended procedure.

## **3.0 COMPLAINTS RECORD**

In the event of a complaint being received by a site operative, the following steps will be taken and details recorded on the Complaints Record Form EMS.S2.07. The complaint will also be recorded in the Site Diary, kept in the Site office:

1. Details of the complainant (including; name, address and a telephone number) if provided;
2. Record of the date and time that the complaint was made and when the incident related to;
3. Record details of the nature of complaint;
4. Was anyone else on site or other stakeholders aware of the issue and if so, who?
5. Establish whether the complaint issue relates to the site, and if so investigate the source of the problem. Contact the Site Manager.
6. If verified, the Site Manager will be informed and they will record how the site has implemented methods to ensure the issue will not cause a complaint in the future.
7. The Site Manager will feedback to the complainant any relevant findings from the investigation and any remediation action taken.
8. The Site Manager to make a record of any signs of pollution. If the complaint (such as emissions to groundwater or a local watercourse) is significant, NRW will need to be contacted on 0300 065 3000 as soon as possible. The severity of the incident will be determined by the Site Manager.
9. If required, the Site Manager will send an email to the local NRW office.
10. All Complaint Record forms must be signed and dated.

Any actions taken in response to the complaint will be recorded on the Complaints Record form and the Site Diary.

The records of any complaints received will be reviewed at future site audits to ensure that similar complaints are avoided in the future.

## **END OF DOCUMENT**

## Appendix 04: Complaints Record Form (EMS.S2.07)

Complainant Details Name:	
(State if source is anonymous) Address:	
Phone No:	
Date and time they made the complaint Date and time the complaint relates to	
What happened, what was the nature of the complaint?	
Was anyone else aware of this – other neighbours or your staff? If so who?	
Assuming the complaint relates to your site, you should contact the Site Manager and they should find the source of the problem and record what went wrong to cause the incident.	
What have you done to make sure that it does not happen again?	
What feedback has been provided to the complainant and when did this occur (date and time)?	
Was there any significant pollution – for example: excessive odour which could be detected off site or spillage onto the ground into a drain or a watercourse? If so NRW must be informed. If there was then you must notify NRW on 0300 065 3000 as soon as possible.	Yes/No/not applicable At what time did you phone? NRW incident number:
You must also write or send an email to confirm this to the local office (see your accident management plan for the address). Have you done so?	Yes/No/not applicable Time: Date:
Please print your name and sign:	

**END OF DOCUMENT**

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[www.wrapcymru.org.uk/CCP](http://www.wrapcymru.org.uk/CCP)

