

**This form will report compliance with your permit as determined by an NRW officer**

Site	Dolwen Abattoir EPR/GP3235GH	Permit Ref	GP3235GH		
Operator/Permit holder	Randall Parker Foods				
Regime	Installations				
Date of assessment	20/11/2019	Time in	09:00	Out	17:00
Assessment type	Audit				
Parts of the permit assessed	Various				
Lead officer's name	Pierce, Emma				
Accompanied by					
Recipient's name/position	Gareth Gower/ Technical Manager	Date issued	03/02/2020		

### Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
C2 - General Management - Management system and operating procedures	C3	1.1.1 (a)

**KEY:** See Section 5 for breach categories, suspended scores will be indicated as such.  
**A** = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,  
**O** = Ongoing non-compliance, not scored.

<b>Number of breaches recorded</b>	<b>1</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>4</b>
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**If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response**

## Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

This CAR form is a summary of discussions and actions following the site meeting on the 20th November 2019 to discuss the Noise Management Plan improvements and site meeting on the 22nd January, where NRW carried out a review of the site CCTV footage.

### Site Visit 20/11/2019:

A site inspection was undertaken to allow us to review the daily noise assessments which are carried out by site on a daily basis.

EMS-003 is carried out on a daily basis at varying times but always within normal operation working hours. As discussed it would be beneficial if a number of these assessments could be carried out during the early morning/late evening and over weekends to provide a more robust record of noise management on the site and also would allow site to identify and address any potential noise issues if they arise outside of normal operating hours.

**ACTION:** Can you confirm whether out of hours noise assessments are being undertaken

EMS-003 scores noise on a scale of 0-4 ranging from inaudible, barely audible, clearly audible and loud and intrusive. It was discussed during the inspection whether these were suitably descriptive to allow noise to be scored accurately.

**ACTION:** Operator to review the scoring guidance and consider amending definitions to better describe noise noted on site. Can you confirm whether this has been completed and if so provide a copy of the new scoring guidance for our records.

Operator advised that EMS-003 was in the process of been reviewed and Version 4 was in draft.

**ACTION:** Can you confirm whether Version 4 is now live and what additional changes have been made to the assessment form. Can you also ensure that any amendments require the NMP and Noise monitoring location plan (EM 07-005) to be updated accordingly.

Whilst carrying out a review of EM07-005 it was noted two of the locations used for noise assessment were potentially not in the most suitable location. Operator agreed to review the locations to ensure they were suitable to identify noise impacting on any receptors. This applied to the locations - D (Field boundary lane) and E (River field boundary lane).

**ACTION:** Can you confirm this has been undertaken and provide an up to date location plan.

### Site Visit 22/01/2020:

NRW conducted a CCTV review with the Operator on site in response to a report of noise nuisance of forklift truck activity on site on the 25th November at approximately 3:30am.

A random selection of dates and times (approx. 15) was provided to the operator at the time of the review. These were all outside of the normal operational hours and the footage was reviewed in approx. 15-20mins timeframes. The site has several CCTV cameras covering the external site. No unauthorised activity was noted on any of these reviewed dates/times.

There was evidence of forklift activity at approximately 3:35am on the 25th November on the CCTV footage. This event was subsequently investigated by site and the below explanation was provided:

*this activity was not authorised by site management and has subsequently been stopped and the key code changed on the fork lift truck. The company responsible have been given strict instructions regarding arrival times and do's and don'ts of what they can and can't do on site. This appears to be a one off incident, no other incident of this type has been reported, or recorded by site security, or on cctv samples that have been reviewed.*

This constitutes a breach of condition 1.1.1 (a) which states: The operator shall manage and operate the activities in accordance with a written management system that identifies and minimises risks of pollution, 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.

**ACTION:** Site to review their Environmental Management System in respect to management procedures for contractors on site and the Noise Management plan in relation to the prevention of forklift activity outside the normal operating hours of 5am -

8pm. Please provide an update by the 09/03/2020

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0036153**

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Operator/Permit holder	Randall Parker Foods	Date	20/11/2019

### Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

### Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
C2	C3	See comments section	09/03/2020

## Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

**See our Enforcement and Civil Sanctions guidance for further information**

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

### Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

**Operational Risk Appraisal (Opra)** - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

## Section 6 – General information

### Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

### Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

### Customer charter

#### What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk). If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

#### Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.