

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

Site	Princes - Cardiff EPR/BX8289IW	Permit Ref	BX8289IW		
Operator/Permit holder	Princes Ltd				
Regime	Installations				
Date of assessment	07/02/2020	Time in	N/A	Out	N/A
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	Monitoring				
Lead officer's name	Harris, Geraint				
Accompanied by					
Recipient's name/position	Victoria Gilbert/ Quality & Environmental Manager	Date issued	12/03/2020		

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

<b>Number of breaches recorded</b>	<b>0</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>0</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

### Princes Soft Drinks

#### Permit BX8289IW

#### Annual monitoring Returns Review

*Form E1:*

I am auditing your annual return forms and have noticed a couple of problems with the 'E1' form. The first one is with the Electricity/Quantity box. This should have the amount of electricity delivered to site in MWh - (your meter readings).

The Electricity/primary energy box should have the sum of the Quantity x 2.4 to give the primary energy produced for electricity. The Electricity/CO2 produced box should have the Quantity x 2.4 x 0.166 to give the CO2 produced for electricity

Likewise, the Gas delivered to the site should be in the Gas/Quantity box, with the CO2 from gas in the CO2 box.

Your recent E1 return is either missing the meter readings or they have been entered into the Primary energy box.

Electricity. Your E1 return

Energy source	Energy Usage	Primary Energy MWh	CO2 produced tonnes
Electricity	Meter readings here	10557.87	1.7526
Nat Gas	Meter readings here	2547.8	0.48379

Total	-	13105.66	2.23639
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Here is an example of how it should be filled out using previous data.

Energy source	Energy Usage	Primary Energy MWh	CO2 produced tonnes
Electricity	4177.5875	10026.21	1664.35
Nat Gas	6859.40	6859.40	1303.286
Total	11036.9875	16885.61	2967.636

Note 1. Electricity figure (Quantity) is multiplied by 2.4. The 2.4 figure comes from the latest 'Resource Efficiency Physical Index' (REPI) for Environmental Permitting Regulation (EPR) A1 sites. The guidance is on page 5 under '*Guidance on calculating and reporting quantities*'. Your return should be reported in MWh and be derived from multiplying your delivered site electricity by 2.4.

Note 2. For conversion from Primary Energy (MWh) to Tonnes CO2, the figure of 166kg per 1 MWh has been used. This comes from the Environment Agency H2 sector guidance, sections 3.1-3.2. This is the same guidance you used for your original permit application, and is cited in your permit at 2.7.3.

**Action:**

Please update your E1 form with the meter readings and forward to NRW.

*Form M1:*

The result for mercury has doubled when compared to previous years. However, remains with the permitted value.

*Form R1:*

Waste generated on site has increased 4-fold in 2019.

**Action:**

Princes Soft Drinks to explain why?

*Form WU1:*

Mains water usage has increased in 2019. However, fruit juice production reduced in 2019 resulting in a lower efficiency with a water/finished product ratio of 1.559. Princes Soft Drinks to review the reduced efficiency.

*Form S1:*

The results of each parameter have remained relatively stable with a minor fall in effluent flow and suspended solids recorded.

*Form PI1:*

Performance indicators for 2019 all show a reduced efficiency during 2019 with water/waste/energy usage per tonne of fruit juice produced increasing.

**Action:**

Princes Soft Drinks are to review the energy efficiency of the site within their annual energy efficiency report.

The Permit requires a number of reports as listed below. The progress and submission of these reports for 2018 and 2019 will be discussed with Princes Soft drinks during a planned site visit on 27<sup>th</sup> March 2020.

**Required Reports**

2.4.1.2 Waste minimisation audit and water efficiency audit – Review - Every 4 years

2.7.1 Energy Efficiency - Report - Annually

2.7.2 Energy management system - Annual update

2.8.1 AMP - Report update - Every 2 years

2.11.2 Site closure plan Full review - Every 4 years

4.1.2 Annual report Emissions and monitoring - Annually

4.1.3 Annual report Performance - Annually

4.1.4 Annual report Fugitive emissions - Annually

4.1.5 Annual report EMS update/changes - Annually

4.1.7 SPMP Review - Every 2 years

END.

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0036454**

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Operator/Permit holder	Princes Ltd	Date	07/02/2020

### 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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

### 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			

## 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.