

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

Site	Magor Brewery EPR/BX7282IS	Permit Ref	BX7282IS		
Operator/Permit holder	AB InBev UK Ltd				
Regime	Installations				
Date of assessment	17/01/2020	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	E1, G4				
Lead officer's name	James, Ian				
Accompanied by					
Recipient's name/position	Carl Rogers/ Environment Manager	Date issued	29/01/2020		

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
E1 - Emissions - Air	C3	2.2.1.3 - Limits for emissions to air as per table 2.2.2.
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4	5.1.1 - The operator shall notify NRW without delay of, 5.1.1.1 the detection of an emission of any substance which exceeds any limit or criterion in the Permit....

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.

Number of breaches recorded	2	Total compliance score (see section 5 for scoring scheme)	4.1
------------------------------------	----------	---------------------------------------------------------------------	------------

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

Compliance Assessment Report – AB InBev – EPR-BX7282IS

Introduction

On the 17th Jan 2020 NRW, via regulating officer Ian JAMES, were notified that there had been an emissions breach at the off-site BTS.

The breach was reported as 152mg/m³ of SO₂ on 9th October 2019 at the CHP unit (off-site but within permitted boundary) compared with a limit of 80mg/m³.

Areas of the permit assessed, finding and actions

Compliance

E1 – Emissions - Air – **Breach C3**

Any non-compliance, from a permitted point source or otherwise, relating to an emission to air. At a waste activity this relates primarily to smoke from an unauthorised fire.

Permit section 2.2.1.3

Finding/Observation

NRW were notified on 17th Jan that there had been an exceedance on 9th October 2019 of 152mg/m³ compared to the limit of 80mg/m³.

The value of 152mg/m³ is recorded here as a Cat 3 breach.

G4 – Reporting and Notification to NRW – **Breach C4**

Used to record any issues associated with the requirement of the site operator to report or notify us of events specified in the permit and includes the means and methods of reporting and notification.

Permit section 5.1

Finding/Observation

The breach was notified as being made on 9th October 2019. Corrective actions and re-testing had occurred prior to notification to NRW. Further delays in notifications may mean that any response is escalated.

The delays in reporting to NRW are recorded here as a Cat 4 breach.

Actions

1. Understand the root cause of the failure and implement corrective measures to prevent reoccurrence.
2. Consider the relative environmental impacts of continuing to operate the CHP despite ongoing SO₂ exceedances and taking the CHP off-line therefore flaring gas. Confirm any changes to the normal operational procedures with NRW prior to implementation.
3. You may wish to review the monitoring/reporting process to improve timeliness of notifications.

Date due: 20th February 2020

Comments

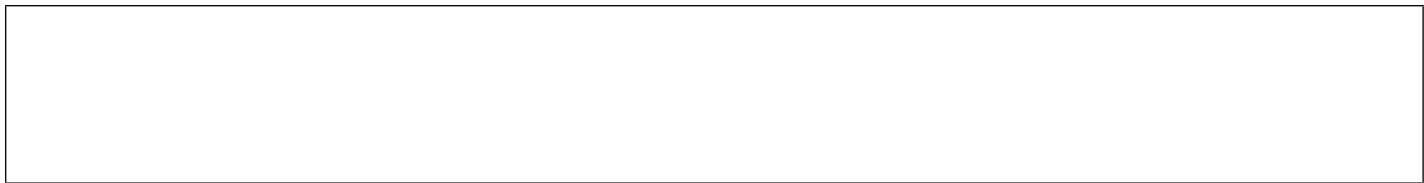
Two previous visits to site were made by officers Ian JAMES and Dave WILLEY on 26th November and 10th December. These were to handover site regulation to Ian JAMES. Carl ROGERS for AB InBev was the host for these visits and discussion relating to site investment, improvements and capacity increases was had. A tour of both main site and, at the latter date, the off-site BTS was undertaken to give familiarisation to the new regulating officer.

Significant infrastructure works were in progress at the time of the visits.

With thanks.

If you have any questions regarding this Compliance Assessment Report (CAR) form, please contact Ian James on 03000 654203 or via email on ian.james@naturalresourceswales.gov.uk

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.



EPR Compliance Assessment Report

**Report ID:
CAR_NRW0036208**

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

Site	Magor Brewery EPR/BX7282IS	Permit Ref	BX7282IS
Operator/Permit holder	AB InBev UK Ltd	Date	17/01/2020

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			
G4	C4	3) Review the monitoring/reporting process to improve timeliness of notifications and advise NRW of the outcomes and/or any proposed changes.	21/02/2020
E1	C3	Ensure emissions are brought back into compliance and root cause of failure is understood with corrective actions to prevent recurrence	21/02/2020

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. 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.