Cyfoeth Naturiol Cymru
Natural Resources Wales

Compliance Assessment Report CAR_NRW0037123

Permit being assessed: NP3099FS. For: Harp International Limited, held by Harp International Ltd At: H A R P International Ltd, Gelli-Hirion Industrial Estate, Pontypridd, Rhondda Cynon Taff, CF37 5SX. **Type of assessment carried out:** Audit, Reason: Routine. On 15/10/2020. Parts of permit assessed: EMS **NRW Lead Officer:** Geraint Harris. **Report sent to**: Caroline Harries, Quality & Environmental Manager on 16/11/2020.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C2 - General Management - Management system and operating procedures	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Harp International **Permit NP3099FS**

The Coronavirus Pandemic has put significant restrictions on the usual operations of NRW regulators. This has meant that a significant portion of Natural Resources Wales duties are continuing to be conducted remotely. It was therefore decided to undertake a review of the Environmental Management System employed at Harp International. Harp were asked to supply an initial set of documents to initiate the audit and then supply further information as the audit progressed. The operator was briefed that the NRW auditor would look at the following:

- External assessor reports under the ISO 14001 management system.
- Environmental policy, plans, aspects and legal registers, environmental risk assessment, internal audits and reviews.
- Specific onsite procedures and operational instructions.
- Various work instructions covering maintenance, critical environmental tasks, emergency response, monitoring, waste handling.
- Additionally, in the EMS document, such items as training, energy efficiency, BAT, records, complaints and maintenance are covered.
- Accident plan.

Harp International were very forthcoming with information and throughout the auditing process were quick to provide any requested additional information. The response received on the 23/10/2020 has answered all the queries stated in the initial email. The review and subsequent replies are stated below. NRW are pleased to hear that there have been no disposals of waste refrigerant for incineration since February 2019 and that material suitable for separation is being segregated and stored ready to send to another company for separation separation when they acquire suitable quantities.

An EMS is a live document that should be updated when significant and pertinent activities and procedures are altered. Throughout this review it was apparent that such processes were occurring and that a high degree of importance is placed on the keeping the EMS up to date and relevant. Furthermore, there is a good degree of engagement amongst the site's employees. The importance placed on the EMS is reflected in their good environmental performance and is a continued demonstration that the system is fit for purpose. The operator should be commended on their diligent effort.

Email Sent: 15 October 2020 09:55

1.1 General management

1.1.1 The operator shall manage and operate the activities:

(a) 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; and

(b) using sufficient competent persons and resources.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

All environmental permits under the Environmental Permitting Regulations 2016 contain the condition stated above requiring a written environmental management system (EMS) and implementation of that system, along with evidence and records of its implementation and application. The EMS runs through the whole process and operations at the site. Typically, it should set the environmental policy, identify significant adverse environmental impacts, identify and comply with applicable legislation, set environmental targets, audit key processes and review the EMS. As part of the permit application process and the ongoing operating techniques, the operator has submitted details of their EMS – this information forms the written intentions of the operator and structure of the EMS.

As a result of Covid-19, a desktop audit of Harp's EMS was planned in advance with the supply of pertinent information via email. The operator was asked to supply an initial set of documents to initiate the audit and then supply further information as the audit progressed.

The operator was briefed that the NRW auditor would look at the following:

- External assessor reports under the ISO 14001 management system
- Environmental policy, plans, aspects and legal registers, environmental risk assessment, internal audits and reviews
- Specific on-site procedures and operational instructions
- Various work instructions covering: maintenance, critical environmental tasks, emergency response, monitoring, waste handling
- Additionally, in the EMS document, such items as training, energy efficiency, BAT, records, complaints and maintenance are covered.
- Accident plan

Harp International were very forthcoming with information and throughout the auditing process were quick to provide any requested additional information. In total NRW reviewed the following documents:

- BSI Certificate of Registration expiry 21/12/2020 received 02/07/2020
- ISO 14001 & 45001 Assessment Report 9742545 March 2020 received 02/07/2020
- IMS Policy, July 2019 received 02/07/2020
- Environmental Aspects, January 2020
- Environmental permit management system, issue 11, received 02/07/2020
- Internal audit schedule 2020 received 02/07/2020
- RA 052 Environmental risk assessment received 02/07/2020
- Environmental legislation registers received 02/07/2020
- Toolbox talk received 23/7/2020, from 10/05/2019
- Spillage Incident Record (Doc 65) received 16/04/2020
- Certificate of Competence for in-house training course regarding Ozone depleting substances received 10/07/2020.
- Example training record received 10/07/2020
- The Accident Investigation Report (Doc 89) was received on 10/07/2020
- Monthly Audit Checklist (Doc 41) received 10/07/2020
- Harp International organisation chart as of June 2020 received on the 10/07/2020
- Management Programme 2020 was received 10/07/2020
- IMS Manual issue, 27, Dec 2019, received 10/07/2020
- IMS Management Review February 2020 (002) 02/07/2020
- Emergency preparedness and responses IMS Procedure number 10. 02/07/2020
- Might want to mention informing NRW of any major spills
- Waste Management IMS Procedure No.6 received 02/07/2020
- Performance Indicators (against hours worked)
- Performance indicators (against refrigerant sold)
- Performance Indicators (against waste received)
- SEQ meeting 25.06.2020

Environmental Policy

The policy document was last revised in July 2019, next revision due July 2020. The policy has been approved and signed by the Managing Director of Harp international. There is a statement included on their website that boldly states their commitment to the highest environmental standards.

"Harp International Limited offers a range of speciality chemicals for use in the refrigeration, air conditioning, aerosol and foam blowing industries.

... The guiding principle in all our operations is an uncompromising attention to detail ...

With an uncompromising attention to detail, our aim is to achieve and maintain the highest quality and environmental standards in all areas of the operation with our Quality Management System - BS EN ISO 9001, Environmental Management System - BS EN ISO 14001 and Occupational Health & Safety Management System - BS OHSAS 18001."

The declarations in the policy provided state the following: a drive to reduce harm to the environment, communications and engagement with staff including training, compliance to current legislation, pollution prevention, continual improvement via targets and objectives, identification of areas for improvement to prevent potential incidents, comprehensive audit programme and engagement with staff and contractors.

Harp international may want to consider addressing the following objectives in their next review:

- Reduce our consumption of resources and improve the efficient use of those resources.
- Measure and act to reduce the carbon footprint of the business activities.
- Manage waste generated from our business operations incorporating reduction, re-use and recycling in accordance with the principles of the waste hierarchy.
- Ensure environmental, including climate change, criteria are taken into account in the procurement of goods and services.

Harp Response (23/10/2020):

A note has been made of the suggestions for objectives and we will discuss these when setting our O&T for 2021.

Legal Requirements and Register

An organization should establish, implement and maintain a procedure for periodically evaluating its compliance with the legal requirements that are applicable to its environmental aspects, as part of its commitment to compliance. Harp International maintains a comprehensive environmental legal register, which was last updated in June 2020. The extensive content indicates Harp's clear understanding of the legal framework to which they must adhere. Harp have also highlighted impending legislation that may impact their business this suggests that the operator employs some form of proactive approach (trade bodies, legal web sites and resources etc.) to keep on top of developing, issued and amendments in applicable legislation. The register itself is dated 20th June 2020 – this indicates that it should be up to date. Harps thorough due diligence on its legal requirements is clear upon reviewing the information against the most recent legislative requirements.

Action 1 2020 EMS Audit: The operator to provide NRW with the sources of information on developments of environmental legislation that they use to maintain the Legal register.

Harp Response (23/10/2020):

Our environmental register is maintained by checking www.legislation.gov.uk on a daily basis, looking for

new or amended legislation. Anything applicable to Harp is added to the register. We are also members of The Chemical Business Association (CBA) and they provide monthly "Regulatory Updates" via email as well as biannual regulatory compliance meetings.

Environmental Manual and Environmental Aspects

Harp International have been accredited to BS EN ISO 14001 since June 2000 and have a mature management system in place. The annual review of the policy was carried out in July 2019 and copies signed by Walid Zerguine are on notice boards. The manual was last revised in December 2019 (issue 27) where more detail was added with regards to management responsibilities. The EMS is reviewed on an annual basis, however, should any changes to activities or equipment arise, if a permit variation is required, or if there is an accident, a complaint or breach of the permit, it will be reviewed immediately.

Harp international employs an integrated management system (IMS) and is described within their IMS manual. This Manual defines the organisation, the responsibilities in place and describes the way the Management System is structured to meet the requirements of Quality systems to the requirements of BS EN ISO 9001:2015, Environmental systems to the requirements of BS EN ISO 14001:2015 and Occupational Health & Safety systems to the requirements of BS ISO 45001:2018. It does not detail the operational controls exercised by the company but gives sufficient information to demonstrate a clear commitment to the control of quality, environmental and occupational health & safety related activities.

Integrated Management System Procedures Documented IMS procedures describe the activities to be followed in running the business, the responsibilities of various personnel who are involved in complying with the integrated management system requirements and the processes and resources used. They are approved and issued by the Q&E Manager. Integrated Management System Work Instructions have been written to support the understanding of specific procedures and are used as a training aid for operators. Integrated Management System Documentation Controlled documents are used to record information generated by the Integrated Management System, which show evidence that the system is in operation.

Once it was confirmed that a management system existed and after examining the overall environmental policy and management organisation, the next step was to look at the scope and structure of the EMS and how this leads to the identification and categorisation of significant environmental aspects. An organisation should identify environmental aspects within the scope of its environmental management system that are associated with its past, ongoing and planned activities, products and services. In all cases, the organisation should consider normal and abnormal operating conditions including start-up and shut-down maintenance and emergency situations and accidents. Harp may want to think about abnormal operations when undertaking their next review of Environmental Aspects. Abnormal operations may include periodic routines that may occur in addition to the daily process and activities. These may include preventive maintenance, plant upgrades, shutdowns or silent periods.

A review of Harp's aspects (internally reviewed January 2020) highlights 20 different aspects. These aspects are numerically quantified using a scoring system for Magnitude, Frequency, Impact, Operational control and Legislation. The resulting scores for each aspect have been tabulated in order of highest score to lowest. To facilitate planning, an organisation should maintain appropriate information on the environmental aspects identified and those considered significant. The organisation should use this information to understand the need for and to determine operational controls. Information on identified impacts should be included as appropriate. Harp may want to think about highlighting the aspects they think are significant and incorporate them into future planning and objectives. The sites aim should be to set objectives and targets against impacts with high significance, while Low and Medium significance is managed through normal operational controls.

From reviewing the information sent to NRW it is unclear if the use of forklift trucks has been assessed when considering the environmental aspects. Please confirm if fuel usage (if applicable) for the forklift trucks has been evaluated as something the operator may have some element of control in, i.e. reducing number of movements.

Harp Response (23/10/2020):

Our forklift trucks are battery operated and we have charging areas on site. They therefore come under the aspect of electricity usage. All forklift movements are essential to the smooth running of the operation. We change our forklift trucks every five years.

Management review

An organisation's top management should, at intervals that it determines, conduct a review of its environmental management system to evaluate the system's continuing suitability, adequacy and effectiveness. This review should cover the environmental aspects of activities, products and services that are within the scope of the environmental management system. An organisation should establish a frequency and methodology for evaluation of compliance that suits its size, type and complexity. Upon inspecting the copious amounts of documents from Harp it's clear that a considerable degree of importance is placed on the upkeep of its EMS and subsequent documents. At Harp an appraisal of its mature EMS is undertaken annually by the senior management. The annual review of the policy was carried out in July and copies signed by Walid Zerguine are on notice boards. The manual was last revised in December 2019 (issue 27) where more detail was added with regards to management responsibilities. The IMS management Review was last conducted on the 26th February 2020. Harp International's Environmental Permit Management System was last reviewed July 2020 and an internal audit schedule for 2020 was created on the 03/01/2020. Environmental aspects were reviewed in September, where a number of updates were made. A new aspect for spillages was also added in January this year.

Environmental Objectives and Targets

The objectives and targets for 2020 were provided in the document titled Management Programme 2020. An action plan supports the delivery of the objectives and targets with an assigned senior manager responsible for their completion. I would like to know how objectives and targets are set? Do you take into account the following documents when setting these targets: environmental policy, legal requirements, regulatory activity, significant environmental aspects and impacts, technological developments, continual improvement?

The operator should aim to set targets for improved environmental performance based on but not limited to their significant environmental impacts. The operator should consider a way of laying out the environmental improvement targets, linked to the EMS aspect and / or overall environmental objective, in a way that shows several years rolling target setting and delivered actions or carried over, i.e. progress. The procedure for setting targets should be wide enough to include relevant actions that fall out of accidents, emergencies and non-compliances – for example these would tie into the policy requirement for zero incidents and non-compliances. It is easier to see if an improvement item then reached its target and when, or if not why. Has an avenue for improvement plateaued, if so why (technology, recycling / recovery option limitations etc.) and when will an area be revisited. This should supply a more detailed record of progress and barriers over several years rolling.

Harp Response (23/10/2020):

A meeting is held when setting O&T and we do consider environmental aspects during this discussion, as well as the policy, legislation, developments etc.
Improvement is a continuous process at Harp and not just confined to those projects set as O&Ts. Additional

improvements which arise for various reasons throughout the year are discussed at monthly SEQ meetings and logged.

Review of environmental performance:

Harp should try and relate the figures to a production value for example electricity used per kg of gas reclaimed. This may give a clearer indication of the sites efficiency and allow for comparisons to previous years. It may also help with the assessment of future objects and targets.

Harp state in their review "We now have the option to send mixed refrigerant to another company for separation. A set of criteria have been issued and the lab will be working to maximise the potential for credits on our reject gas and reducing the amount sent for incineration." This would be an excellent target for to state and achieve and would be a good example to advertise the principles of the waste hierarchy.

Harp Response (23/10/2020):

We do produce performance indicator graphs. Please see attached.

We have not sent any waste refrigerant for incineration since February 2019. Material suitable for separation is being segregated and will be sent to another company for separation when we have suitable quantities.

Review of accidents, incidents and emergencies:

An important part of your integrated system should be to monitor the effectiveness of the measures you put in place to control the risks in your workplace. As part of your monitoring, you should investigate incidents to ensure that corrective action is taken, learning is shared and any necessary improvements are put in place. Investigations will help you to:

- identify why your existing control measures failed and what improvements or additional measures are needed
- plan to prevent the incident from happening again
- point to areas where your risk assessment needs reviewing
- improve risk control in your workplace in the future

Harp capture and record incidents, accidents and spillages on various forms, these include: The Accident Investigation Report Document 89 and the spillage incident record document 65. Furthermore, the IMS Management Review 2020 tabulates this data annually for the senior management to review. Document 89 is an extensive list of questions to help Harp investigate the critical aspects surrounding an incident or near misses at their site.

Action: Taking the incidents dated on the 18/03/2020, 23/03/2020 and the 16/04/2020 as examples, was the accident investigation report used for these incidents? As stated in the form, what were the immediate, underlying root causes? And what risk control measures were highlighted/recommended following these similar incidents?

Looking at the number of near misses reported per year they seem low. Especially in 2019 where it looks as though only two were reported for the whole year.

Action: Investigate why these numbers are so low, are they not getting reported or is there an alternative system for reporting near misses? If there is an alternative method are the results trended and analysed?

Reviewing at the environmental incidents of 2019 I have a few questions. What was the follow up on the root causes and preventative actions for these incidents? If we look at the incident where there was PRV lifting, what was done to investigate why the incident occurred? What is being done to prevent the PRV lifting in future?

There appears to quite a few leaks involving cylinders, what is done at the site in terms of early detection for example “sniffer” checks on receipt, leak (soap) checks on known areas where weld or valve failures have been found in the past?

There appears to on average approximately 500kg of leaks per year, what is being done to try and reduce these emissions? Finally, why is there no data for 2014 and 2018?

Harp Response (23/10/2020):

<u>Action</u>
Spillages are discussed at SEQ meetings. The incidents in question were noted and discussed with the warehouse by the Operations Manager. See minutes dated 25/06/2020. This was a difficult time due to the departure of the Distribution Manager and the Coronavirus pandemic. A number of staff were self-isolating and the staffing in the warehouse was reduced to two inexperienced members only. This is not normal practice and has not happened since. A new Distribution Manager was put in place at the end of September 2020.

<u>Action</u>
It has always been and remains a struggle to get operators to report near misses. We are a small company and top management does not wish to introduce incentives for reporting. We introduced “Good Catch” reporting in 2020, which started well, but has dropped off, possibly due to Covid. We have had less staff on site, operators socially distanced etc. A good catch is defined as an incident, event or condition that can be easily and immediately corrected. Toolbox talks have also been on hold due to Covid and reminders/encouragement to report are usually issued during these meetings.
Pressure relief valves are in place to protect pipework. Occasionally, the spring weakens over time and it lifts the PRV. The spring was replaced on this occasion. Planned maintenance includes the regular changing of springs, but for an unknown reason, there was an issue with this particular spring.

We had several issues with the disposable cylinder supplier’s cylinders at the beginning of 2019 and complaints were raised on the supplier. They relocated and had manufacturing problems at the start. These cylinders are disposable and arrive already boxed ready for filling. The issues were therefore identified at the point of fill as we do not take them out of the sealed box. The one cylinder was in the box in two halves with no weld at all. Cylinders were sent back to disposable cylinder supplier for internal investigation.

We have an existing target to have no emissions, but living in the real world, this is not always possible to achieve. After filling, all our cylinders move down a conveyor for “capping and wrapping”. At this point, the cylinders are leak checked using an electronic leak detector.

There were no recorded incidents in 2014 and 2018.

<u>Training</u>

The management of an organisation should determine and make available appropriate resources to establish, implement, maintain and improve the environmental management system. Those persons undertaking work activities that involve (a) significant actual or potential environmental aspect(s) or associated impact(s) should be competent to do so in a manner that meets the requirements of the environmental management system.

For those activities that are most important in the management of its environmental aspects, the organisation should identify the knowledge, understanding, skills, or abilities that make an individual competent to perform them. Once required competence is identified, the organisation should ensure that persons performing these activities have the required competence. Competence is based on appropriate education, training, skills and/or experience. Competence requirements should be considered in recruiting, training and developing future skills and abilities of persons working for or on behalf of the organisation.

Harp International employ around 40 members of staff. This includes Directors, Managers, Team Leaders, administration staff, laboratory assistants, maintenance personnel, Warehousemen and Production Operators. Job descriptions are available on P-drive under 'Training'. There current staffing level is deemed suitable to manage and operate the site. Individual training records are held on P-drive. In addition, training matrices are maintained for warehouse and production personnel. Document 114 was provided by Harp which details the extensive training record of David Stead. All new members of staff receive an induction which is recorded on document number 61 and includes environmental awareness. They are then provided with a Company Handbook which includes all policies and further information on the environment and pollution. All staff handling refrigerants have in-house F-Gas training which has been approved by F-Gas Support/Defra.

Caroline Harries has a WAMITAB Certificate of Technical Competence as well as a Continuing Competence Certificate. This is renewed every two years. An additional member of staff recently completed the qualification in order to provide holiday cover. A continuing competence test will be taken within two years of completing the certificate.

Work instructions are written for all tasks and are used as part of the in-house training programme. Weekly toolbox talks are also used as a training medium and topics discussed are recorded on document number 38. An example of a previous Toolbox Talk regarding spillages was sent to NRW as part of this audit. Harp currently use an Environment Agency You-tube video entitled "Pollution Prevention Pays" to assist with spillage training.

ISO 14001:

The operator declares that they operate an externally verified quality management system to ISO 9001 and an environmental management system to ISO 14001. The EMS has been externally registered and in place since 2002. The site has a current valid registration certificate for the implementation of ISO 14001. NRW is pleased to report that Harp have retained their registration to ISO 14001. The documents provided show that the site have good systems and procedures in place to implement, review, plan and act on the EMS. The Being certified under ISO 14001 provides confidence in the organisation's ability to meet its own environmental policy, including the commitment to comply with applicable legislation, to prevent pollution, and to continually improve its performance. The purpose of ISO 14001 is to provide organisations with a framework to protect the environment and respond to changing environmental conditions in balance with socio-economic needs. However, it does not ensure that the organisation is currently achieving optimal environmental performance. Harp International employ the services of BSI to audit and certify their EMS. Their most recent and successful audit highlighted one minor NCR and one Opportunity for improvement. Harp International have a good track record of closing out non-conformities discovered during external audits.

Other areas of Interest

The Monthly Audit Checklist (Doc 41) received 10/07/2020

Action: Who completes the monthly checklist? Where are the results stored?

Emergency preparedness and responses IMS Procedure number 10. 02/07/2020

Action: You may want to mention informing NRW of any major spills within the procedures.

Harp Response (23/10/2020):

The factory audit checklist is completed by one of the WAMITAB trained personnel. Records are held in the Q&E office and findings are discussed and actioned at SEQ meetings.

IMS No.10 will be updated regarding informing NRW of major spills.

Conclusion to Desk Based Assessment of EMS Documentation

NRW is content that Harp's EMS is adequate, well managed and implemented fully across the site. This has led to a good record of environmental performance and continued demonstration that the system is fit for purpose, applied out on site, performance is recorded and communicated, improvements are secured and staff are engaged. The operator should be commended on their diligent effort.

End of email.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report
Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:
- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores
The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?
In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):

A: Permitted activities
- A1 Specified by permit

B: Infrastructure
- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management
- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management
- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions
- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity
- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting
- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency
- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. 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 our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.