

Compliance Assessment Report CAR_NRW0037149

Permit being assessed: GP3235GH.

For: Dolwen Abattoir EPR/GP3235GH, held by Randall Parker Foods

At: Dolwen Abattoir , Dolwen, LLANIDLOES, Powys, SY18 6LX.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 08/12/2020 between 10:00 and 12:30.

Parts of permit assessed: See Notes

NRW Lead Officer: Emma Pierce, accompanied by Rebecca Harwood.

Report sent to: Operations Manager, Operations Manager on 09/02/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F1 - Amenity - Odour	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

This CAR form provides actions discussed during a site inspection on the 8th December 2020. It also provides a summary of the review of notifications and monitoring returns submitted in 2020.

ACTION: As discussed during the site inspection on the 8th December, it would be worthwhile for the operator to undertake an investigation into the emission releases (Schedule 5 notifications) over 2020, to better understand what the root cause is for these releases and where further work could be undertaken to reduce their frequency. Please can you provide me with details of when an investigation is likely to take place and any findings/actions which are recommended as a result by the **9th March 2021**.

During the site inspection on the 8th December 2020 a discussion took place regarding control of birds which are causing a nuisance within the lairage area. You advised that you wanted to use a bird scarer to try and prevent the birds from settling in these areas. As discussed at the time, it would be worth discussing this with your Local Authority in case there are any planning conditions which may be relevant.

For NRW permit compliance there are no concerns, as long as the site is operating within the conditions of the permit and any approved noise management plan. It was discussed that it may be beneficial to advise your local neighbours of your intentions, it was also noted that the farm opposite your site uses bird scarer sirens, hourly during the day, at present. This was heard whilst we were on site.

No areas of concern were noted during the site inspection, the site was operational and there was no evidence of odour or noise outside the site boundary. A discussion was had about early spraying to prevent any issues in the spring/summer with flies, and this had already been considered and would start similar to that in early 2020.

Quarterly Returns:

Jan - Mar 2020 (Q1)

The W1 quarterly returns were submitted within the timescales required by the permit. The results were all below the emission limit values set in the permit.

Apr - Jun 2020 (Q2)

The W1 quarterly returns for April and May were submitted within the timescales required by the permit and below the emission limit values set in the permit.

Jul - Sep 2020 (Q3)

The W1 quarterly returns for July and August were submitted within the timescales required by the permit and below the emission limit values set in the permit.

Oct - Dec 2020 (Q4)

The W1 quarterly returns for October and November were submitted within the timescales required by the permit and below the emission limit values set in the permit

Annual performance reporting:

Condition 4.2.2 of the permit requires a report on the performance of the activities over the previous year, annual production and treatment data, and performance parameters. This is to be submitted by the 31st Jan.

The 2020 annual report was received on the 30th January 2020. Following a review of this data, there was no outstanding actions or non-compliances.

Review of Part A/B Notifications for 2020:

There has been 13 Schedule 5 notifications during 2020. They were all notified to NRW between the range of 24 hrs to 5 days after the event.

The dates of these emission releases were:

11th, 21st, and 26th February 2020, 15th and 22nd May 2020, 31st May 2020, 24th June 2020, 22nd July 2020, 19th August 2020, 11th September 2020, 30th September 2020, 18th and 29th November 2020: They were all minimal in the quantities released and were repaired as soon as the issue was identified.

Permit Condition 3.2.1 states that: Emissions of substances not controlled by emission limits shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise those emissions.

Following review of the above releases, I am satisfied that they have not resulted in anything more than minor releases, they have all being relatively short in duration and repaired within a timely manner. It also appears that the Operator has followed the Emergency, Incident and non-conformance procedure which is part of their EMS and therefore taken appropriate measures to minimise the emissions.

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.