

Compliance Assessment Report

Report ID:
CAR_NRW0036724

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

Site	PB Gelatins EPR/DP3030ZC	Permit Ref	DP3030ZC		
Operator/Permit holder	PB Gelatins UK Limited				
Regime	Installations				
Date of assessment	29/05/2020	Time in	10:19	Out	11:55
Assessment type	Audit				
Parts of the permit assessed	Accident Management				
Lead officer's name	Harris, Geraint				
Accompanied by					
Recipient's name/position	Julie Campbell/ EHS Manager	Date issued	22/06/2020		

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
C1 - General Management - Staff competency/training	C3	Permit Condition 4.3.1
C2 - General Management - Management system and operating procedures	C2	Permit condition 1.1
E2 - Emissions - Land and groundwater	C3	Permit condition 3.1 and 3.2

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	3	Total compliance score (see section 5 for scoring scheme)	39
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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

PB Leiners

Permit Number DP3030ZC

On Thursday the 28th May the following anonymous report was received by Natural Resources Wales' (NRW) Incident Communication centre. "Anon caller stated that in the past 24-48 hours there was an incident at PB Leiner UK Unit A6, Severn Rd, Pontypridd CF37 5SQ. The reporter alleged that the site had a 20-tonne delivery of Caustic Soda and that 14 tonnes of this product 'was lost' due to a burst valve on site. The reporter stated that this spillage went to a bunded area but it is unknown where it went from there."

The significance of such a high volume of hazardous material coupled with the absence of a notification from PB Leiner's regarding the spill and in accordance with our incidents classification, and compliance classification scheme, this is a potential high level incident. Fortunately, as the regulator for the site I was able to make contact with the site's Health, Safety and Environment Manager Julie Campbell, who was able to substantiate that the incident had occurred on the site. Julie stated that they had an incident involving a leaking valve which was contained within their concrete standing within their site. In line with NRW guidance, I arranged a site visit for the following morning.

I arrived at the site in Treforest at 10:20 on Friday 29th May and met Julie Campbell and Mauricio Caetano Ramos at reception. We walked over to the area of the site where the incident occurred (The Farm). The area consisted of three large double skinned tanks adjacent to the site's perimeter fence. The area cannot be accessed by the public and is secured behind a locked gate. The middle tank, designated for caustic storage, is where the incident took place. The tank itself is a double bunded HDPE internally bunded tank with auto-dosing and above ground delivery pipework. The secondary containment is provided by an integrated HDPE bund attached to the primary tank and concrete hardstanding below the pipework. There are 900mm high concrete block masonry walls to three sides of the tank with large channel drainage which discharges to the industrial effluent sewer to the fourth side. The bund drain is piped to the effluent channel drain, which could be used if a spillage within the bund was to be detected. According to PB Leiners permit application, the masonry walls and channel drainage provide a degree of tertiary containment which would contain minor spillages outside of the main bund. The corresponding pipework and Chem Guard (Housing the valves and pumps) are located adjacent to the Caustic Tank and within the tertiary containment.

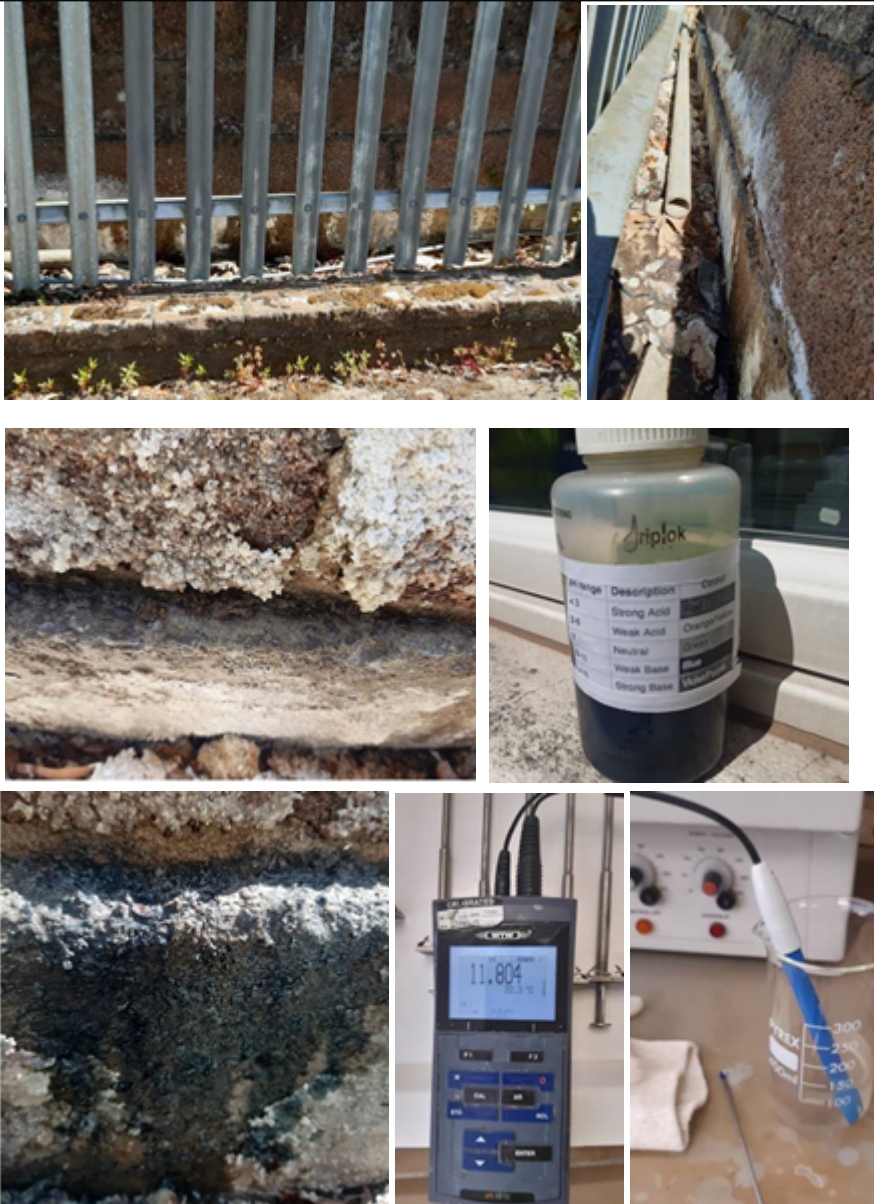


The remnants of the spill were obvious upon reaching the area. A white trail of dried Caustic could be seen from the Chem Guard to the Effluent Drain. Within this area several significant cracks and holes in the concrete floor could be seen. Additionally, dry residue and liquid could be seen around the whole of the tank, with a pool of liquid located adjacent to the tertiary wall mentioned above.

According to the schedule 5 notice received on request following the incident "A tanker delivered caustic to the Farm bulk storage farm facility. The NaOH was demanded by the NaOH dosing system. The unit did not receive the dose. The operator inspected the unit and found that there was NaOH leaking into the drainage system from the ChemGuard unit. The NaOH entered the drainage system and was treated by the process." Julie Campbell informed me that when they initially investigated the source of the leak, the majority of the valves within the Chem Guard unit were loose. The Schedule 5 notice states "In the ChemGuard unit, the joint between pump inlet and pipework was not connected securely". There is currently no remote alarm system for informing the site of leaks within the Chem Guard unit. The Unit itself is designed to capture small drip like leaks and not leaks on the scale seen with this incident.

We then headed to the area of the site where the discharging of chemical tankers takes place. The area is located on an impervious concrete pad with no cracks or holes. There is a high-level alarm associated with the filling of the Caustic Tank. During tanker offloading there is no way for the driver to see the storage tanks that are being filled.

Finally, we walked out onto the public path located on the opposite side of the 900mm high concrete block masonry walls mentioned above. Upon close inspection, damp and dry patches of white residue were evident over a several metre expanse of the wall and soil at the base of the wall. These patches were located at the same height as the floor on the opposite side of the wall (the floor where the caustic had spilt). Since the other sections of the wall either side of the caustic tank were free from these patches it was thought prudent to test the liquid and the white solid to see if they were a result of the caustic spill. Julie Campbell was able to retrieve a pH indicator solution from PB Leiner's Laboratory. We sprayed a damp patch of the wall with the indicator and waited for the colour change. Within a few seconds the colour changed from green to dark blue/purple indicating a high pH. Following this Julie removed a portion of the white solid and took it to the Laboratory for a pH test. The chemist at the lab dissolved the solids in deionised water and used a pH meter to analyse the solution. The result of which was a pH of 11.8 indicating a strong alkaline solution. These results had indicated that the 900mm high concrete block masonry walls used for tertiary containment had failed.



Although the area of contamination was relatively small and confined, the soil at the base of the wall was highlighted as a pathway for the contamination to reach the subsoil and groundwater within the local environment. Even though there was no evidence of caustic on the public footpath or road, given the extremely close proximity of the public footpath, had it been raining there would have been a significant chance that highly alkaline liquid may be created and spilt onto the public footpath and neighbouring surface water drains. Consequently Public Health Wales were informed of the incident.

NRW were not informed of the incident until receiving an anonymous report via their Incident Communication Centre (ICC). This prevented any timely meaningful in-situ assessment of the extent of any environmental harm. NRW's Incident Communication Centre (ICC) did not receive any reports from PB Leiners until asked by NRW several days later.

Permit Breaches

Non Compliance 1 - Failure to Notify Natural Resources Wales of the incident.

4.3.1 Natural Resources Wales shall be notified without delay following the detection of:

(a) In the event that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the

operator must immediately—

(i) inform Natural Resources Wales,

(ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and

(iii) take the measures necessary to prevent further possible incidents or accidents;

(b) in the event of a breach of any permit condition the operator must immediately—

(i) inform Natural Resources Wales, and

(ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;

(c) in the event of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

4.3.2 Any information provided under condition 4.3.1 (a)(i), or 4.3.1 (b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

NRW consider this failure to notify, under the above permit condition a Category 3 non-compliance for the breach of permit condition 4.3.1. Failure to comply with an environmental permit is an offence under regulation 38(2) of the Environmental Permitting Regulations (Consolidated 2016). Natural Resources Wales considers the loss of 14 tonnes of hazardous Caustic liquid significant and warrants the immediate notification of such an incident to NRW with a schedule 5 notification. Even though the majority of the liquid was contained, a leak of such magnitude so close to a public area has the potential to cause a significant impact and 'may significantly affect the environment'. The operator must immediately—inform Natural Resources Wales as stated in the permit and in the guidance 'How to Comply With Your Environmental Permit'. Actions following this breach are located at the end of this report.

Non Compliance - 2 Unauthorised discharge.

3.2 Emissions of substances not controlled by emission limits

3.2.1 Emissions of substances not controlled by emission limits (excluding odour) 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.

All non-compliances (except for those relating to amenity) are categorised on their reasonably foreseeable impact on the environment and not their actual impact. Incident Categorisation Guidance Note 102 states 'We will categorise our response to any incident according to the actual or potential impacts upon the people, communities, environment of Wales and any effect to our own organisation'. **NRW consider the leaking of caustic a breach of permit condition 3.1.1 and 3.2.3 and have awarded a Category 3 for the incident.** However, should the investigation determine significant contamination of the underlying soil and groundwater, this may be escalated to a category 2 incident. Such an incident had the potential to impact a public area and with the requirement to inform Public Health Wales, could warrant awarding of a category 2 for the breach.

Non Compliances 3

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, nonconformances, closure and those drawn to the attention of the operator as a result of complaints; and

Upon inspecting the whole Caustic system around Tank BC012 there are a number of concerns. Firstly, a number of large cracks and a significant hole were seen within the spillage area. These areas of concern

can provide a pathway to environmental receptors for hazardous liquids. 'How to Comply With Your Permit' states that an inspection and maintenance programme is needed for impervious surface and containment facilities. PB Leiners were able to send copies of their chemical bund inspection sheet form MWR 031 for the months March to May. On each of the forms the surface of the concrete floor is free from surface defects. The most recent inspection being the day after the incident. The most concerning observation from these forms is the form dated the 27th May which was the day after the incident. On the inspection sheet for tank BC012 there is no mention of the leak or the defects noticed during my inspection. The leak was reported as occurring on the 26th of May at 19:30. The person undertaking the inspection would have noticed the liquid and white residue on the floor on the 27th as a minimum. This highlights a significant deficiency of the management system and warrants an investigation as to why the leak and the condition of the floor and walls were not recorded on form MWR031 for the 27th May.

The cracks and hole identified on the concrete pad inside the side boundary are another potential pathway for caustic to reach the subsoil and groundwater. Both of these areas were surrounded in white residue and were located within the pathway of the leaking Caustic as it flowed to the effluent drain. It is unknown how fast the liquid flowed in these areas and it is quite possible that a considerable amount of caustic could have entered these defects. Furthermore, the presence of white caustic residues on the hardstanding several days after the incident is a cause for concern. Even more significant was the failure to identify the failure of the tertiary bund and hence the resulting contamination so close to the public pathway. Please provide NRW with a copy of your accident/incident management plan along with any reviews and updates of the plan considering this recent incident.

PB Leiners were asked to clean up the contamination located on the tertiary bund walls along with extracting the contaminated soil located in the gap between the perimeter fence and the tertiary bund. This soil was identified as a possible pathway for contamination to reach the groundwater and surrounding environment. However, when PB Leiners extracted the soil they found it to be only a few centimetres thick and underlain with brickwork. The Caustic was prevented from leaching into the environment via this pathway and hence was contained. However, the potential to pollute is still significant.

PB Leiners will need to undertake testing within the area to quantify the degree of contamination. Under the Industrial Emissions Directive (IED), 5-year groundwater assessments and 10-year soil assessments have been brought into EPR Regulations since 2013 'Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination'. Given that Caustic Soda spilled over this cracked area it makes it more likely that the site needs to fulfil the requirement of the IED by intrusive sampling rather than relying on a systematic appraisal because the exact quantity of Caustic, which may have seeped through the concrete cracks into the soil is unknown.

The condition of the tertiary bunding as highlighted in the review of the chemical (inventory) storage arrangements on site by Nijhuis H2OK Ltd is also a concern. The more pertinent points of the report are stated below in the appendices. It was stated back in 2014 that concrete block masonry walls were all deemed not to comply with the requirements of CIRIA 763 on the grounds of their inadequate structural stability, and susceptibility to thermal and/or shrinkage cracking which provides a pathway for leakage. It was recommended in that review that these bunds be replaced. 'The Maintenance checklist MWR 031' has a requirement for checking the integrity of these bunds. On the day preceding the incident the check sheet was ticked as saying no defects found. However, when the system of valves controlling the caustic system failed the tertiary bunding system failed and Caustic was able to leak out of it. We now ask that PB liners review their current 'Maintenance checklists' practices. We also ask that a review be carried out into why the recommendations in the report by Nijhuis have not been adopted. Furthermore, it is stated in PB Leiner's EMS Maintenance Plan (submitted with the permit application) that a weekly inspection of tanks and bunding is to be undertaken, however it now appears that it is on a monthly rota. Please provide justification for the change in inspection routine. Additionally, no effective control measure was in place to

alarm operators of the depleting tank levels. It is recommended that a system and its corresponding operating procedures are put in place to prevent similar incidents.

The culmination of not heeding the recommendations regarding the bunds, the maintenance of the equipment, the lack of detection for leaks and lack of surveillance are all contributing factors to this incident. **Consequently, NRW score the potential of an incident, and look for the root cause, not just the incident itself, consequently a Category 2 breach for permit condition 1.1 General Management has been recorded. Failure to comply with an environmental permit is an offence under regulation 38(2) of the Environmental Permitting Regulations (Consolidated 2016).**

Caustic soda Trace Heating

Within the Chem Guard unit a trace heating system was identified. With such high concentrations of sodium hydroxide being used on site all process pipes should be heat traced and insulated if temperatures below 18°C are anticipated for even short periods of time. In the storage of liquid NaOH, the ability to maintain the solution's temperature and correlating viscosity is generally considered a requirement of large-scale store and use. Sodium hydroxide solutions can freeze at temperatures beneath (15.5°C), depending upon NaOH concentration, which can cause release and build-up of solid NaOH. As the solution temperatures fall and near the freezing point, NaOH can begin to crystallize (precipitate) out of solution, which can cause build-up of the solid within storage containers, pumps, or piping. The viscosity of sodium hydroxide is therefore strongly temperature dependent. Since large quantities of Caustic are utilised at PB Leiners, please can you provide records from their management system recording all aspects of the trace heating system including but not limited to maintenance records, inspection records and failure records. The solidification of Caustic within the valves and pipework of the Caustic dosing system could provide a likely source for their failure. PB Leiners must review this possibility as soon as possible.

Onsite Chemical Storage

This incident has highlighted some additional causes for concern. The caustic tank involved in this incident is not recorded in any of the records we have at NRW. Importantly, the most recent Site Condition Report sent within the last 6 months does not include this tank. How can comprehensive assessment of the site be concluded with the omission of certain tanks? Please provide a reason why this site was omitted? Please provide an update of the tanks used on site including their purpose and storage capacity?

Action 1 PB Leiners 18th June 2020: Improve training to ensure that all relevant personnel, including management, understand that NRW must be informed of any incident without delay and that, as a minimum, a completed Part A of Schedule 5 must be submitted within 24 hours.

Action 2 PB Leiners 18th June 2020: Investigate the trace heating system for the Caustic delivery system as a source for the valves malfunction and report findings to NRW by the **16th July**.

Action 3 PB Leiners 18th June 2020: Inspect the cracks and holes on the concrete pad adjacent to the Caustic tanks. Provide evidence that the Caustic didn't escape into ground below these areas. **Due 16th July**

Action 4 PB Leiners 18th June 2020: If no evidence can be provided for above, undertake monitoring of the ground below the concrete pad to ascertain the level of contamination.

Action 5 PB Leiners 18th June 2020: Review the adequacy of the management system and provide improvements to the inspection routine for the sites bunds, tanks, pipework, impermeable floors and tertiary bunding. Report findings by **16th July**.

Action 6: Remediate the cracks and holes within the impermeable concrete surface and the brick wall with immediate effect. Look into the use of chemically resistant products for both areas. Within the area there are tanks that contain Caustics and acids. Identify a product that can withstand both chemicals.

Action 7 PB Leiners 18th June 2020: Replace old signage on site. The tank concerned with this incident has a hazard warning sign in front of it for Phosphoric acid.

Action 8 PB Leiners 18th June 2020: Carry out a full review of storage and containment on site against the environmental permit and official site diagrams. List the deficiencies identified and report findings by **16th July**.

Action 9 PB Leiners 18th June 2020: PB Leiners to provide answers to actions stated in the previous CAR Form CAR_NRW0036429. These are repeated at the end of this form and must be completed by the **16th of July 2020**.

Action 10 PB Leiners 18th June 2020: Within your EMS Manual provided to NRW in 2014 you state "The EMS Management Team review all emergency preparedness and response procedures annually, after the occurrence of either an incident or emergency situation or in the event of significant changes to operations or legislation. Site is required to send their accident management plan and any reviews or updates in light of the recent incident, by **July 16th**."

Action 11 PB Leiners 18th June 2020: PB Leiners to investigate why the spill and condition of the bunding and concrete floor were not recorded in the Chemical Storage and Bund Inspection sheet MWR 031, for the inspection that occurred the day after the incident. Report findings by **July 16th**

Appendix

Extracts from the following document:

REVIEW OF CHEMICAL STORAGE FACILITIES AT P B GELATINS, TREFOREST INDUSTRIAL ESTATE, PONTYPRIDD FOR COMPLIANCE WITH CIRIA 736. Nijhuis H2OK Ltd. 21/11/2014

Should leakage occur, there is tertiary containment in this area which would contain any minor leakages from the pipework, but could be overwhelmed if the pipework were to fail across its full bore. The capacity of the tertiary containment could be improved by implementing the recommendations listed below. (page 50)

Recommendations:

- Review and update maintenance and inspection procedures to ensure they are reflective of the risks present on site. Consider including inspections of the tertiary containment systems. Consider whether daily, weekly, monthly, annual and after rainfall procedures are required. (page 50)*
- The tertiary containment provided in this area could be improved by extending the site boundary wall up to the factory building. In addition, some of the channel drainage covers are currently steel plates. Capacity would be increased if these were changed for open mesh flooring covers as present elsewhere. (page 50)*

The civils type bunds formed with concrete block masonry walls were all deemed not to comply with the requirements of CIRIA 763 on the grounds of their inadequate structural stability, and susceptibility to thermal and/or shrinkage cracking which provides a pathway for leakage. It has been recommended that these facilities are upgraded to compliant standards. Advice on this has been provided in the gap analysis chapter. Each block work bund structure should be subject to a site specific detail design process. It may be beneficial to retain the existing blockwork walls as sacrificial shutters in construction of the proposed reinforced concrete walls as this will maintain some degree of containment at all times during the improvement works. (page 76)

Outstanding Actions:

Answers for the following actions are due by the 16th July.

ACTION:

PB Leiner to supply the procedure that sets out the frequency of inspections, calibration, maintenance and cleaning of abstraction equipment. This should form part of the sites EMS and reflect any manufacturers requirements.

ACTION:

PB Leiner to investigate the potential of installing a meter closer to the point of abstraction or provide an alternative measure to demonstrate the equal amount of water at point of abstraction and at the current meter reading location.

ACTION:

PB Leiner to provide evidence demonstrating calibration procedures for the water meter and where and how these calibration records are saved. Please provide records of when the meter has been calibrated over the past 7 years.

ACTION:

PB Leiner to provide the serial number of the water meter.

ACTION:

The licence holder shall retain evidence of current certification for inspection by NRW.

ACTION:

PB Leiner to provide a screen shot from the PLC system used to record the abstraction rate / volumes.

ACTION:

Please provide hourly, daily and yearly meter readings between the day this request has been received and at least 7 years previously.

ACTION:

PB Leiner to provide procedures for assessing river levels during low flows and provide contingency measures.

ACTION:

In line with permit condition 1.1.1 of the permit the accident management plan should be reviewed to include the potential of flooding and what measures are proposed to reduce the impact on the site's operations.

Action:

PB Leiners to investigate the substantial increase in mains water use in 2019 and report to NRW.

End.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0036724**

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

Site	PB Gelatins EPR/DP3030ZC	Permit Ref	DP3030ZC
Operator/Permit holder	PB Gelatins UK Limited	Date	29/05/2020

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.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

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			
C1	C3	Improve awareness to inform NRW of incidents that have the potential to cause environmental harm.	16/07/2020
C2	C2	review and Improve current management system.	16/07/2020
E2	C3	Clean up spill and fix deficiencies in containment.	16/07/2020

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.