Cyfoeth Naturiol Cymru Natural Resources Wales

Compliance Assessment Report

Report ID: CAR_NRW0033906

This form will report compliance with your permit as determined by an NRW officer					
Site	Llangefni prepared meats	Permit Ref	SP3430RL		
Operator/Permit holder	2 Sisters Food Group Limited				
Regime	Installations				
Date of assessment	09/08/2018	Time in	10:00	Out	15:00
Assessment type	Site Inspection				
Parts of the permit assessed	All				
Lead officer's name	Kelk, Matthew				
Accompanied by					
Recipient's name/position	Steve Jones/ Interim HSE Manager	Date issued	13/09/2018		

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
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
E3 - Emissions - Surface water	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F4 - Amenity - Pests/birds and scavengers	A	
F5 - Amenity - Deposits on road	A	

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	0	Total compliance score (see section 5 for scoring scheme)	0

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

An inspection of the 2 Sisters Llangefni facility was undertaken on the 9 August 2018.

The following issues were discussed:-

Discharge to Surface Water - Ammonia Levels

Large storage tank was cleaned out in late May 2018. After reviewing daily ammonia readings by the site levels are generally now seen to be low.

Action

NRW request that the daily ammonia monitoring for the surface water drains is continued until further evidence is gathered to prove low levels of ammonia will continue, particularly in longer periods of wet weather. We also request that the daily monitoring is forwarded to NRW on a monthly basis.

Environmental Management System

Aspect Register

The aspects register has been reviewed since the EMS audit in June 2018 and various part adjusted.

Environmentally Critical Equipment

A list of all environmentally critical equipment has been compiled since being identified as an absent part of the EMS during the last audit on site. The list details contract agreements for all plant equipment that could have an environmental impact.

EMS Objectives

EMS objectives were discussed and these are set at group level, these are linked to SQPDCE system on site. These are discussed at weekly meetings.

Internal Audit Programme

An internal EMS audit programme has been compiled, a couple of audits a month are now planned for each

audit topic. A copy of the audit programme was shown during the meeting.

Recommendation

As discussed ensure audits cover relevant site EMS procedures.

Electronic Penstock Valve Operation Procedure

During the inspection Steve Jones and l ran through the procedure for the operation of the electronic penstock, this appeared fit for purpose.

Training

Environmental training has been given to all senior managers since the previous EMS audit. An example of the training was shown whilst on site. Additionally environmental permit training has also been rolled out to all managers with responsibilities that have an environmental impact. Examples of this training were shown. Training logs were shown for both sets of the aforementioned training.

Environmental training is to be rolled out as part of the induction that is given to all staff starting at 2 Sisters Llangefni. Although this is still in the development stage at present. Site were asked about refresher training. Environmental training will become part of the annual induction refresher training.

Action

Procedural training matrix was not available at the time of the inspection due to staff availability, site to send a copy of this matrix by 12 October 2018.

Site Walkover

No particular issues were identified during the site walkover, improvements to the ammonia plant drip trays and IBC bunds were shown during the inspection.

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Operator/Permit holder	2 Sisters Food Group Limited	Date	09/08/2018

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.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	**CCS Category**	**Action required/advised**	**Due Date**
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. Health and Safety Executive, local authorities) on environmental issues
- Carrying out statistical analysis, research and development on environmental issues
- Providing public register information to enquirers
- Investigating possible breaches of environmental law
- Assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. 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.