

Compliance Assessment Report

CAR_NRW0033294

Permit number	XP3830UR	Operator name	The First Milk Cheese Company Ltd
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Site name	Haverfordwest Creamery
Site address	Pembroke Road, Merlins Bridge, Haverfordwest, Pembrokeshire SA61 1JN
Type of assessment	Report/Data Review Site Returns 2020

Date of assessment	31/12/2020	Time in	N/A	Time out	N/A
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Parts of permit assessed	1 Management; 3 Emissions & Monitoring; 4 Information
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NRW Lead officer	Douglas Cowie	Accompanied by	N/A
Report sent to – Name and position	Colin Reed Senior SHE Manager	Date	23/02/2021

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
E1 Emissions – Air	Assessed or assessed in part (A)	3.1.1 3.1.2
E3 Emissions – Surface water	Assessed or assessed in part (A)	3.1.1 3.1.2
E5 Emissions – Waste	Assessed or assessed in part (A)	1.4.1
G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment	Assessed or assessed in part, no evidence of non-compliance found. Action Only (X)	3.5.1 3.5.5 3.5.6
G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events	Assessed or assessed in part (A)	3.5.2 4.1.1 4.1.3
G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales	Assessed or assessed in part (A)	4.2.1 4.2.2 4.2.3(b) 4.2.3(c)

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales	C4 No environmental impact	4.2.3(a)
G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales	C3 Minor	4.3.1(b) 4.3.2
H1 Resource efficiency – Efficient use of raw materials	Assessed or assessed in part (A)	1.3.1 1.4.1
H2 Resource efficiency – Energy efficiency	Assessed or assessed in part (A)	1.2.1

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

Total number of non-compliances recorded	Total non-compliance score
2	4.1

2. What action is required?

Criteria	Action needed	Complete by
G1	Action 33294/01: Please verify the minimum <i>and</i> maximum pH results recorded in 2020 along with the dates on which these results were recorded. We can accept a revised Form Water1 (2020 return) for this purpose.	01/04/2021
G1	Action 33294/02: Please can you confirm the missing uncertainty values for flow and temperature. We can accept a revised Form Water1 (2020 return) for this purpose.	01/04/2021
G4	Action 33294/03: The operator should submit a Schedule 5 notification to the regulator (for the reported NO _x emissions exceedance at A4 in 2020) by the specified date. If enough information is now available, we can accept a consolidated Part A + Part B submission.	01/03/2021
G1	Action 33294/04: Please confirm the energy conversion factor used for natural gas in 2020.	01/04/2021
G4	Action 33294/05: Please ensure the 2021 annual reports include an interpretative review in accordance with permit condition 4.2.3(a).	31/01/2022

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

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

You are non-compliant with your permit. Other than the provision of advice and guidance, 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

Site description

The First Milk Cheese Company Ltd operates a milk processing and cheese production facility at Haverfordwest Creamery, Merlins Bridge, Haverfordwest. The company is a subsidiary of First Milk Ltd, the UK's largest dairy farmer co-operative. The facility is permitted as an installation under Section 6.8 (The Treatment of Animal and Vegetable Matter and Food Industries) of the Environmental Permitting Regulations (EPR).

Milk from approximately 300 local farms is pasteurised and processed at the installation to produce cheese and dairy products. The permitted installation includes an integrated effluent treatment plant (ETP) which discharges to the Western Cleddau. An agreed nutrient 'off-set' scheme mitigates the creamery's treated effluent discharge through a combination of nutrient management measures at (scheme member) dairy farms.

Purpose of visit/assessment

Monitoring returns and reports for the following period(s) have been assessed in this CAR form:

- 2020 annual returns: emissions to water (other than sewer)
- 2020 annual returns: emissions to air
- 2020 annual performance reports

The relevant permit conditions are listed under Sections 1.2, 1.3, 1.4, 3.1, 3.5, 4.1, 4.2, 4.3 & 4.4 of First Milk's permit.

Compliance assessment

Emissions to water (other than sewer) and land

Permit XP3830UR requires 6-monthly reporting of emissions to water, specifically a discharge of treated effluent from emission point W2.

The permit requires the operator to monitor the following parameters:

Parameter	Emission Limit Value	Reference Period ¹	Monitoring frequency
Maximum daily discharge volume	2500 m ³ /day	24 hours	Continuous
Maximum rate of discharge	120 m ³ /hour	Instantaneous	Continuous
Temperature	35°C	Absolute maximum	Continuous
Biochemical Oxygen Demand (BOD) ²	40 mg/litre	Absolute maximum	Weekly

¹ The permit does not currently specify a sample type for discontinuous measurements. First Milk undertakes daily final effluent monitoring, therefore NRW has agreed that composite samples (using a series of 24-hour samples taken within each weekly monitoring period) can be used to derive the weekly results.

² The permit specifies BOD monitoring. Chemical Oxygen Demand (COD) is also measured by First Milk and this will become a formal measurement parameter in the permit following the publication of revised Best Available Techniques (BAT) Conclusions for the Food, Drink & Milk and the Waste Treatment industry sectors. BOD may be retained alongside COD in the permit to meet other water quality measurement and monitoring requirements.

Biochemical Oxygen Demand (BOD) ²	20 mg/litre	95 th percentile ³	Weekly
Total Suspended Solids	60 mg/litre	Absolute maximum	Weekly
Total Suspended Solids	30 mg/litre	95 th percentile ³	Weekly
Ammonia (as NH ₄ -N)	10 mg/litre	Absolute maximum	Weekly
Ammonia (as NH ₄ -N)	3.5 mg/litre	95 th percentile ³	Weekly
Total Phosphates	5 mg/litre	Absolute maximum	Weekly
Total Phosphates	3 mg/litre	95 th percentile ³	Weekly
Iron	10 mg/litre	Absolute maximum	Weekly
Iron	5 mg/litre	95 th percentile ³	Weekly
Aluminium	2 mg/litre	Absolute maximum	Weekly
Aluminium	1 mg/litre	95 th percentile ³	Weekly
pH (range)	6 – 9	Absolute maximum	Continuous

The operator submitted the 2020 effluent monitoring returns on 6 July 2020 (HY1) 18 January 2021 (HY2) in the agreed reporting format (Form Water1).

We have assessed both 6-monthly submissions and note that the results recorded at W2 in 2020 are within the permitted limits.

We have assessed the operator's submissions and note the following:

1. The reported result for flow discharge rate in 2020 approaches the permitted limit (but is compliant). The uncertainty value should be stated alongside the reported result – see action below.
2. The reported result for total phosphate⁴ in 2020 approaches the absolute maximum permitted limit (but remains compliant after considering the associated uncertainty).
3. A single result has been reported for pH (8.2). Where the emission limit is expressed as a range, the result should be expressed as 'minimum – maximum' measured values. It is acknowledged that the permit is misleading in that the reference period specifies an 'absolute maximum' value.

Action 33294/01: Please verify the minimum *and* maximum pH results recorded in 2020 along with the dates on which these results were recorded. We can accept a revised Form Water1 (2020 return) for this purpose.

4. For the results reported against 95th percentile (look-up table) parameters, it is assumed that the highest 5% of the all the measured results obtained over the calendar year have been discounted, and the highest result from the remaining 95% of samples has been reported.
5. Some information is missing from Form Water1:
 - Measurement uncertainty for flow volume, flow rate and temperature

³ For 95% of all measured values according to the look up table in Schedule 6 of the permit.

⁴ Phosphorus (P) has been identified one of the main nutrients involved in freshwater eutrophication in the UK. Standards designed to prevent/limit eutrophication are already established e.g. EU Water Framework Directive. A mix of national interventions and catchment-based measures is considered the most effective way to control P inputs now and in the future. For operators of permitted sites with effluent discharges, this will usually mean more stringent emission limits for P.

When reporting monitoring data for permit compliance purposes, please be clear if the results have been reported ‘as measured’ alongside the associated uncertainty, or if the uncertainty has already been removed.

Monitoring results should be reported in the form $R \pm U$, where R is the result and U is the uncertainty associated with the result at the 95% confidence interval. Form Water1 provides separate columns for this purpose. There is further guidance regarding measurement uncertainty within section 6.7 of the following publication:

[Technical Guidance Note M18 \(Monitoring\) Monitoring of discharges to water and sewer](#)

For automatic sampling equipment, the following publication is also relevant:

[MCERTS: performance standards and test procedures for continuous water monitoring equipment - part 1 automatic sampling equipment - GOV.UK \(www.gov.uk\)](#)

Automatic sampling equipment used for the purpose of complying with environmental permitting requirements should be certified to MCERTS standard. Manufacturers of such equipment should supply information which can be used to calculate uncertainty values.

Action 33294/02: Please can you confirm the missing uncertainty values for flow and temperature. We can accept a revised Form Water1 (2020 return) for this purpose.

Emissions to water – future requirements

New monitoring requirements will be introduced at the conclusion of the ongoing installation permit review, considering the relevant BATc and any local environmental considerations. Our previous report **CAR_NRW0034632** and recent correspondence from NRW's Permitting Service discusses this topic in more detail.

Emissions to air

Permit XP3830UR requires annual monitoring and reporting of emissions to air from emission points A1 – A3 (3 x natural gas-fired boilers supplying the installation with steam and electricity).

A fourth emission point (A4) has been added to the permit following the commissioning of a 2.7 MWth Combined Heat & Power (CHP) unit in 2020. Emission point A4 is classified as a new Medium Combustion Plant (MCP) and it also has an annual monitoring and reporting requirement⁵.

The permit requires the operator to monitor the following parameters:

Emission Point	Parameter	Emission Limit Value	Reference Period	Monitoring frequency
A1	Oxides of Nitrogen (NO & NO ₂ expressed as NO ₂)	-	Periodic	Annually

⁵ The first monitoring measurements at A4 will be carried out within four months of the issue date of permit variation V005, or the date when the MCP is first put into operation (whichever is later).

A2	Oxides of Nitrogen (NO & NO ₂ expressed as NO ₂)	-	Periodic	Annually
A3	Oxides of Nitrogen (NO & NO ₂ expressed as NO ₂)	-	Periodic	Annually
A4	Oxides of Nitrogen (NO & NO ₂ expressed as NO ₂)	95 mg/m ³	Periodic ⁶	Annually
A4	Carbon Monoxide (CO)	-	Periodic ⁶	Annually

The operator submitted the 2020 air monitoring returns on 3 February 2021 in the agreed reporting format (Form Air1). A short extension to the normal reporting deadline was agreed with the operator to allow concurrent emissions testing for the existing boilers and the new CHP unit, fulfilling the specific requirements of permit condition 3.5.5.

We have assessed the operator's annual submission and note the following:

1. The reported NO_x results at A1 – A3 in 2020 are higher than in previous years, but when compared with previous Air1 returns the results are not untypical. No emission limit values are specified in the permit for NO_x at A1 – A3.
2. The reported NO_x result at A4 in 2020 (98.3 mg/m³) marginally exceeds the permitted emission limit. This result was initially reported as a higher value but was verified with the operator on 16/02/2021.

After applying the monitoring uncertainty value ($\pm 4.1 \text{ mg/m}^3$), the NO_x result at A4 in 2020 remains within the emission limit and is not considered to be a permit breach.

3. The reported CO result at A4 in 2020 appears elevated but is understood to be typical of emissions from this type of engine when natural gas fuel is used. No emission limit value is specified in the permit for CO at A4.
4. The regulator has not been formally notified about the elevated NO_x result at A4 in 2020 in accordance with the permit requirements. Initially the result for NO_x at A4 included within Form Air1 submitted on 03/02/2020 was considerably higher (295 mg/m³) than the verified result.

A Schedule 5 Part A notification must be submitted to the regulator if an exceedance of a permitted emission limit value is detected.

For exceedances of permitted emission limit values, the regulator must be informed without delay once the exceedance is detected. A written Schedule 5 Part A notification should follow within 24 hours of detection. Schedule 5 Part B supports the Part A submission and should be used to supply any more accurate information e.g. verified monitoring results, investigation outcomes. Part B should be submitted to the regulator as soon as practicable.

The failure to notify the regulator of the NO_x exceedance at A4 does not comply with conditions 4.3.1(b) and 4.3.2 of the permit. CCS Category 3 scores (CCS3) have been recorded against these non-compliances (criterion G4) in accordance with NRW's published CCS guidance. The breaches of conditions 4.3.1(b) & 4.3.2 for this monitoring period have been consolidated into a single CCS3 score.

⁶ Monitoring requirements are defined at a temperature of 273.15 K, a pressure of 101.3 kPa and after correction for the water vapour content of the waste gases at a standardised O₂ content of 6 % for solid fuels, 15 % for engines and gas turbines and 3 % all other MCPs

Action 33294/03: The operator should submit a Schedule 5 notification to the regulator (for the reported NO_x emissions exceedance at A4 in 2020) by the specified date. If enough information is now available, we can accept a consolidated Part A + Part B submission.

Annual Performance

The operator submitted the 2020 annual energy, water use and performance returns on 18 January 2021 in the agreed reporting format (Form Energy1, Form WaterUsage1, Form Performance1).

The Energy1 return confirms the delivered and primary energy use at the installation in 2020. The operator has distinguished between the different energy sources and has included a separate entry for the new CHP unit. This distinction is useful when examining the overall energy profile for the Creamery. It is recognised that CHP energy output is only at a very early stage, which is reflected in the return. In the long term it is expected that the Creamery's energy use profile will change as the CHP's contribution grows.

The operator has not included an energy conversion factor for natural gas on the return (please confirm).

Action 33294/04: Please confirm the energy conversion factor used for natural gas in 2020.

Water use at the Creamery is recorded on Form WaterUsage1. It is noted that water use has increased in 2020 which corresponds with increases in raw milk use and cheese production (+5000t/year cheese). This reflects business growth and sustained demand for the Creamery's products.

The improvements and capital investments previously discussed in **CAR_NRW0034632** are likely to have contributed to increased cheese production at Haverfordwest as well as improving the manufacturing process. Process efficiencies have reduced the Creamery's environmental footprint and mitigated the increased raw material and water use. It is understood that the amount of water recovered from processing activities now represents ~50% of all water used at the installation.

Form Performance1 records other key parameters including:

- Raw material used i.e. milk (tonnes)
- Waste generated by the installation (tonnes)
- Mass of ammonia released to water (kg)
- Mass of refrigerants released to atmosphere (kg)
- Nitrogen, phosphorus & sediment reductions from the nutrient offset scheme

It is understood that the waste figure considers effluent treatment plant sludge removed from the installation. It is noted that this has reduced in recent years as the waste recovery and disposal route(s) have evolved, with increased use of off-site anaerobic digestion. Sludge press technology (dewatering) has previously been trialled at the ETP and may offer a further opportunity to reduce waste tonnages. Process efficiencies at the Creamery including water recovery and condensate return projects may also be contributing factors.

It is understood that hydrofluoroolefin (HFO) refrigerants with a low Global Warming Potential (GWP) are now used at the installation, replacing hydrofluorocarbon (HFC) gases such as R404a.

The mass of ammonia released to water from the installation has reduced considerably since 2018 (156.7 > 49.7 kg/year). Although the 2020 ammonia result is higher than in 2019, this reflects increased production at the Creamery and a concurrent annual increase in the treated effluent discharge. The ammonia discharge from the installation is discussed within the annual summary report for the nutrient offset scheme.

First Milk's farm nutrient offset scheme is discussed in detail within **CAR_NRW0037181**. The operator submitted the 2020 annual nutrient offset summary report to NRW on 16/02/2021. This specific element of permit condition 4.2.3 and its associated requirement outlined in Schedule 4 Table S4.3 have therefore been met, and this also addresses **Action 37181/04** confirmed in our previous report. **Action complete**

The submitted information is also relevant to the requirements of permit conditions 1.2.1 (energy efficiency), 1.3.1 (raw materials efficiency) and 1.4.1 (wastes produced by the activities). Compliance with these permit conditions has only been partially assessed within this report.

The 2020 annual performance report does not include a commentary/interpretative review of the results of the monitoring and assessment carried out in accordance with condition 4.2.3(a) of the permit. Reductions in energy, water and raw material use should be included and discussed in the report required under this condition. Monitoring and performance data should be analysed and graphed to help identify any data trends or patterns.

The interpretative review does not need to be onerous and there is no set format in which it must be submitted. It should summarise and discuss the key results, events and patterns observed. The review is also an opportunity for the operator to demonstrate any positive trends e.g. relative reductions in energy, water use, CO₂e emissions over time as First Milk consolidates and increases the sustainability of its operations.

The omission of an interpretative review of the monitoring data does not comply with condition 4.2.3(a) of the permit. A CCS Category 4 score (CCS4) has been recorded against this non-compliance (criterion G4) in accordance with NRW's published CCS guidance.

Although we consider this to be a technical breach with no environmental impact, the operator is reminded that an interpretative review of monitoring must be reported for 2021 and annually thereafter to avoid future non-compliance scores. NRW acknowledges that the operator has made significant progress towards sustainability targets in recent years.

Action 33294/05: Please ensure the 2021 annual reports include an interpretative review in accordance with permit condition 4.2.3(a).

Summary and actions required

We have provided advice and guidance in response to the non-compliances and CCS scores identified in this report. A compliance summary can be found in Sections 1 and 2.

Actions are identified for the operator's attention (see Section 2). A further assessment will be carried out once these actions have been completed and NRW has received the requested information.

NRW recognises that the operator has made significant progress in recent years in terms of the sustainability and environmental footprint of the permitted installation. Some of this progress is reflected in the annual monitoring and performance returns assessed in this report. The interpretative review of monitoring and performance data offers an opportunity to demonstrate how First Milk is meeting its own sustainability targets whilst also fulfilling an important permit requirement.

Note: Novel Coronavirus (COVID-19)

At the time of this permit compliance assessment, an escalation in the threat posed by the novel coronavirus (COVID-19) pandemic has resulted in the imposition of several stringent measures across the United Kingdom.

The statutory measures to control and reduce the spread and impact of COVID-19 are having an impact on the site operator's activities and the regulator's duties. At the time of writing, all routine regulatory compliance visits have been suspended by NRW due to ongoing risks of COVID-19 infection and transmission. NRW currently employs a risk-based approach when deciding to deploy its resources.

Natural Resources Wales / Our response to the coronavirus pandemic

During this pandemic there will be an expectation that site operators continue to comply with their environmental permit conditions. Where the operator has identified an issue that is likely to result in permit non-compliance or increased environmental risk, the operator is expected to raise this with the regulator at the earliest opportunity.

END OF ASSESSMENT

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 in the aspects assessed.
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.