

Compliance Assessment Report CAR_NRW0038680

Permit being assessed: AB3792ZU.

For: Pwllpridd Free Range Poultry Unit, held by Endaf JENKINS

At: Pwllpridd, Lledrod, Aberystwyth, Ceredigion, SY23 4HZ.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 18/06/2021 between 11:00 and 14:00.

Parts of permit assessed: See criteria listed below

NRW Lead Officer: Jeremy Goddard, accompanied by Aled Rees.

Report sent to: Endaf Jenkins, Permit Holder on 27/08/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C1 - General Management - Staff competency/training	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
D1 - Incident Management - Site security	Assessed (A)	
D2 - Incident Management - Accidents, emergency and incident planning	Action only (X)	
D2 - Incident Management - Accidents, emergency and incident planning	Action only (X)	
E1 - Emissions - Air	Assessed (A)	
E3 - Emissions - Surface water	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
F4 - Amenity - Pests/birds and scavengers	Assessed (A)	
F5 - Amenity - Deposits on road	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	Assessed (A)	

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	
H1 - Resource Efficiency - Efficient use of raw materials	Assessed (A)	
H2 - Resource Efficiency - Energy efficiency	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?

Criteria	Action needed	Complete by
D2	Have a fit for purpose site ID board produced and fitted near the site entrance.	30/11/2021
D2	Produce a comprehensive Accident Management Site plan produced and keep on wall within reception and also off site with easy access in the event of an emergency.	30/11/2021

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 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 was a pre-planned site inspection carried out by Natural Resources Wales officers Jeremy Goddard and Aled Rees who were accompanied on site by Mr. John Jenkins and Mrs. Meinir Jenkins. Mr. Endaf Jenkins, the permit holder was not present during the visit.

General Observations:

The visit was undertaken during a prolonged period of dry weather.

A general walk around the site found the infrastructure in an apparent good state of repair and the external areas clean and tidy.

Surface water drains appeared to be free from effluent contamination. Roof water guttering and downpipes were in a good state of repair.

The ranging area was fenced near the building and had a clean shale hardstanding surface near the hatches used by the birds to enter and exit the building. At the time of the visit the ranging area was showing no signs of surface erosion and there was no nearby watercourse reducing the risk of run-off and pollution.

Disinfectant footbaths were found near entrances into the building. The baths were in a good state of repair and not over filled.

No odour or noise issues were noted by officers walking around the site.

Fuel was being kept in a bunded fuel station. There was a concrete wall in front of the tank which provided collision protection from vehicles driving to the rear of the building. No such wall was present on the other side of the tank but the tank is far enough away from the access track to allow adequate room for vehicles and lower the risk of collision.

The site did have a temporary ID board at the access gate into the permitted area. This board needs to be replaced with a more permanent equivalent.



(Above) Temporary ID board on access gate.

The ID board should tell the public about the nature of the site and who they can contact for further information or who to notify if they have a concern. It needs to be easily readable from outside the site in daylight hours and must include:

- the permit holder's name
- the operator's name if different
- an emergency contact name and the operator's telephone number
- a statement that the site is permitted by Natural Resources Wales
- the permit number
- Natural Resources Wales national number, 0300 0653000.

Systems and Records:

There were comprehensive and well kept records and procedures. There was evidence that Mr. Endaf Jenkins undertakes formal training as permit holder which is then disseminated to

other members of staff, who are all family.

There was a complaints procedure within the file which included a report previously passed onto the site by a Natural Resources Wales officer.

At the time of the last site visit in October 2018 the site had 32,000 birds. The site is now operating at the permit capacity of 48,000 birds.

Accident Management Plan:

There were a number of plans present for the site in the procedural folder but not one comprehensive accident management site plan. It was recommended that an annotated and laminated comprehensive site plan should be produced and put up on the reception wall in the event of emergency services having to attend during a fire. Copies of this plan should also be kept off site and be available to emergency services at short notice. Ideally this plan would be kept in a gatehouse away from the main building but there isn't one on site.

Raw Materials:

No chemicals are kept on site apart from disinfectant. This is kept within the building which has no surface water drainage system. All cleaning chemicals are brought to site by specialised contractors between production cycles.

Water Usage:

There were water meters linked to the site control system. Water consumption records were kept on site. The site used mains water with no groundwater borehole.

Waste Records:

List of manure deposits were kept on site and there was also records of bird mortalities. Manure was being utilised at land located at Pwllpridd and a neighbouring property called Ynysforgan. The fields where manure is being spread were analysed for nutrients in November 2020. Manure was also being analysed, last done in May 2021 but this needs to be done once per production cycle.

The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021:

There was a conversation on how the new regulations will make the current system of spreading manures to land every four days non-compliant with legislation and an offence. Officers were shown an existing slurry pit at Pwllpridd which is due to be converted into a covered manure store, there are also plans to build a similar facility at another farm. Adequate storage facilities will be required to meet the storage and no-spread requirements of the new regulations when the relevant transition periods come to an end.

Assurance Schemes:

Now that you have had two inspections since gaining a permit you may wish to consider joining an assurance scheme. Further details can be found [HERE](#). If you decide to pursue this option then please liaise with Natural Resources Wales first.

ENDS

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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.