

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

Site	Dolwen Abattoir EA/EPR/GP3235GH/V003				Permit Ref	GP3235GH			
Operator/ Permit holder	Randall Parker Foods								
Date	19/06/2014				Time in	16:00	Out	17:00	
What parts of the permit were assessed	Annual return forms, W1, R1, WU1, E1, PI1, 4.14, 4.15 Q4 2013, Q1 2014								
Assessment	Report/data review	EPR Activity:	Installation	X	Waste Op	Water Discharge			
Recipient's name/position	Phil Gillon Environment H&S								
Officer's name	Richard Taylor				Date issued	19/06/2014			

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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

Condition(s) breached

a) Permitted activities	1. Specified by permit	N	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	A	
	2. Management system & operating procedures	A	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	A	
	2. Land & Groundwater	A	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	A	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	A	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),

A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded

0

Total compliance score
(see section 5 for scoring scheme)

0

If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores:
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

The purpose of this Compliance Assessment Report (CAR) form is to act as the official receipt for the following documents;

- Revised fugitive emissions report to satisfy permit condition 4.1.4 received 2nd April 2014.
- EMS annual improvement report to satisfy permit condition 4.1.5 received 4th March 2014.
- W1 emissions to water (mercury and Cadmium) for 2013 received 31st Jan 2014.
- Annual reporting forms W1, R1, WU1, E1, & P11. Received 28th Jan 2014.
- Quarter Oct-Dec 2013 W1 returns received 7th Jan 2014.
- Quarter Jan–Mar 2014 W1 return received 24th Apr 2014.
- Waste & Water efficiency submission to satisfy permit conditions 2.4.1.2 received 9th May 2014.

Natural Resources Wales (NRW) has the following comments to make.

Annual return form E1, electricity calculation.

Care needs to be taken with the correct reporting units (MWh) throughout the sum. Site reported a use of 238045.8 MWh for their annual electricity use. This was 100 times higher than in previous years had it been correct, but this indicated that the decimal point was incorrectly placed. For the next column under 'primary energy', using the meter reading should have given 571309.92MWh, but site reported 571.3099 MWh. Neither of which was correct because the real figure should have been 5713.0992MWh before this was used to calculate the CO₂ from electricity figure of 948.37 tonnes CO₂. However, the final calculation was brought into line with comparative results from previous years, and is accepted by NRW as the true value. Compilation of the E1 return will be an audit item scheduled for 25th June 2014.

Recommendation 1.

Future E1 electricity calculation should be based on the following method (using data from 2013).

Delivered electricity, 2380.458MWh x 2.4 = 5713.0992MWh (primary energy)

CO₂ = Primary energy (MWh) x 0.166 = 948.37 t CO₂.

Permit condition 2.4.1.2.

The submission has now been reviewed against the permit condition which asks for a methodology and action plan following periodic waste and water audits. The submission consists of a reference to where data can be obtained from rather than a detailed methodology and action plan which should have been produced after the audits as stated in the permit. Year on

year water and waste figures have been submitted routinely to The Environment Agency/NRW in the past, but these are not following the required waste/water audits.

There is a reference to water use reduction of between 3-5%, and the submission is a 'description' as required in the permit, but it is not a detailed methodology and action plan. Site has submitted data under permit condition 4.1.5 which fills this requirement, as well as annual and pollution inventory data. Therefore NRW accepts the 2.4.1.2 report with the following recommendation.

Recommendation 2.

Schedule waste minimisation and water use audits into the site environmental management system. These audits should be carried out 'periodically' but no longer than 4 yearly, and result in an action plan with achievable targets set across a timeframe. The action plan and progress made against set targets identified needs to be sent to NRW within 2 months of each audit's completion in accordance with permit conditions, and no longer than 4 years from the date of the last submission, 9th May 2014. It is acceptable to collate data from the EMS 4.1.5 submission for this periodic submission for 2.4.1.2.

EMS submission for pc 4.1.5

The Environment Agency is cited throughout the submission as the site regulators. Natural Resources Wales took over this role from 1st April 2013. The submission is accepted on the understanding that references to the EA should have been NRW.

Recommendation 3.

Refer to Natural Resources Wales (NRW) as the environmental regulator for the site in future submissions.



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Section 3- Enforcement Response

Only one of the boxes below should be ticked

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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

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

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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.

