

Compliance Assessment Report

Report ID:
CAR_NRW0026620

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

Site	Dolwen Abattoir EPR/GP3235GH		Permit Ref	GP3235GH	
Operator/Permit holder	Randall Parker Foods				
Regime	Installations				
Date of assessment	14/11/2016	Time in	14:10	Out	15:10
Assessment type	Audit				
Parts of the permit assessed	Noise and General Management				
Lead officer's name	Frost, Julia				
Accompanied by	Wright, Paul				
Recipient's name/position	Gareth Gower/ Technical Manager	Date issued	04/01/2017		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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
C2 - General Management - Management system and operating procedures	C3	1.1.1
F2 - Amenity - Noise	C3	3.5.1

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	2	Total compliance score (see section 5 for scoring scheme)	8
------------------------------------	----------	---	----------

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

A site visit was carried out following observations made whilst meeting a local resident.

Following a noise monitoring exercise in August, Randall Parker Foods were required to make a number of improvements to the general management on site. Natural Resources Wales were informed on 26 October 2016 that these improvements had been made.

However, from our observations, operations on site were being carried out without consideration of the impact off site on neighbouring properties. Repeated shouting, banging, revving of engines and shunting was heard whilst inside the resident's property.

Offal unloading was observed whilst we were on site. A metal bucket is mechanically tipped and the contents emptied into a container which is in turn emptied into the by products trailer. The system does not appear to tip the bucket far enough, which means that the operative is having to bang on the bucket to get some of the contents out.

We also observed a loading bay operative shouting (from within the loading bay) to the driver who was in the vehicle cab.

Permit condition 3.5.1 states that *"emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales"*.

Permit condition 1.1.1 states that *"the operator shall manage and operate the activities:*

(a) in accordance with a written management system that identifies and minimises risks of pollution...

(b) using sufficient competent persons and resources"

Despite assurances that improvements have been put in place, from our observations these permit conditions are not being complied with. Natural Resources Wales are concerned that permit compliance is not being given sufficient priority on site and a number of improvements are required.

A copy of the Noise Management Plan shall be provided to Natural Resources Wales by 24 November 2016.

Randall Parker Foods are required to carry out a full assessment of all activities on site (prioritising those in the area near to the closest off site property) that have a potential to impact on off site noise. This should involve an assessment of the activities against BAT and timescales for carrying out any improvements highlighted. Report summarising the findings shall be submitted to Natural Resources Wales by 13 Jan 2017.

The environmental management system shall be updated and implemented to incorporate the improvements highlighted by the assessment above by 13 Feb 2017.

Relevant staff shall be trained on the revised procedures / operational instructions and made aware of the potential impact of their actions on off site noise / permit compliance by 13 Feb 2017.

EPR Compliance Assessment Report

Report ID:
CAR_NRW0026620

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

Site	Dolwen Abattoir EPR/GP3235GH	Permit Ref	GP3235GH
Operator/Permit holder	Randall Parker Foods	Date	14/11/2016

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.

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.

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			
C2	C3	As per text in CAR form	13/02/2017
F2	C3	As per text in CAR form	13/01/2017

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 reports 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 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.