

Compliance Assessment Report

Report ID:
CAR_NRW0031390

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	01/03/2017	Time in	10:45	Out	13:30
Assessment type	Audit				
Parts of the permit assessed	Waste				
Lead officer's name	Frost, Julia				
Accompanied by	Ellis, Rhys				
Recipient's name/position	Gareth Gower/ Technical Manager	Date issued	20/03/2017		

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
A1 - Specified by permit	A	
C2 - General Management - Management system and operating procedures	C3	1.1.1 a
F1 - Amenity - Odour	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	1	Total compliance score (see section 5 for scoring scheme)	4
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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

Site visit carried to review the Operator's progress with a number of issues, as well as to review waste documentation.

EMS Audit

A number of recommendations were made during the audit in December 2016. The Operator confirmed that the majority of these have been progressed. There is now a new ETP Operative in place and the recommendation relating to internal trigger limits will now be considered.

The training matrix has been updated and a lot of training was carried out in February, with more planned for March.

Improvement Condition

The response to this improvement condition is required by the end of March 2017. The number of improvements were reported to have been carried out to date. The Operator was reminded to ensure that the response submitted provides all of the information requested by the improvement condition.

Three chiller units have been replaced and staff have been re-trained on the potential impact of their tasks on compliance with the permit conditions relating to noise.

Waste Paperwork

Document EM06-006 is in the process of being produced. This will detail all waste generated on site, where it is stored, relevant EWC code, waste carrier and disposal site and details of the associated permit. This document shall be completed to ensure it contains all of the relevant information.

Copies of the relevant waste carrier certificates were available.

Copies of the permits for the receiving sites were not available.

The duty of care notes assessed did not all contain all of the required information. The link to a sample note is copied below:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/311081/LIT_7932.pdf

The Operator should review the current duty of care notes and update as necessary to ensure they contain the missing information.

The documentation for the effluent treatment plant sludge and lairage waste that goes off site to be landspread was reviewed. No duty of care notes were in place. The Operator was unable to provide us with details of the permit / deployment used for the disposal of this material whilst we were on site, and has subsequently confirmed that there are none in place.

The transfer of this waste without the benefit of duty of care notes and the subsequent disposal at a suitably permitted site will be investigated further by Natural Resources Wales.

Failure to take reasonable measures to secure that there is a written description of the waste that will enable other persons to avoid a contravention of Section 33 EPA or Regulation 12 of the Environmental Permitting Regulations is an offence under section 34 of Environmental Protection Act 1990.

The Operator shall ensure that adequate procedures are in place within the environmental management system to ensure that waste from the permitted installation is disposed of in line with the relevant legislation, (including using registered waste carriers, duty of care transfer notes and suitably permitted or exempt sites) by end April 2017. Breach of permit condition 1.1.1

EPR Compliance Assessment Report

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Operator/Permit holder	Randall Parker Foods	Date	01/03/2017

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.

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

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	See text in CAR form	30/04/2017

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 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.