

Compliance Assessment Report

Report ID:
CAR_NRW0031978

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	03/08/2017	Time in	12:00	Out	13:15
Assessment type	Audit				
Parts of the permit assessed	Fly Control				
Lead officer's name	Frost, Julia				
Accompanied by					
Recipient's name/position	Gareth Gower/ Technical Manager	Date issued	07/08/2017		

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
F4 - Amenity - Pests/birds and scavengers	C3	1.1.1
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C3	4.3.1

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

Visit carried out as a result of recent complaints relating to flies at neighbouring property. Paul Bufton, Powys County Council was also present.

On 13 July 2017 Paul Bufton traced the source of fly complaints back to the abattoir. Large number of flies were evident in the lairage, overflow lairage and effluent treatment plant building. This information was passed to Natural Resources Wales on 13 July 2017 and the Operator was asked to investigate and make the necessary improvements.

To date those improvements have included - cleaning down of the "organic" lairage, spraying lairage with larvicide, installation of fly bait stations and review of waste collections.

During the visit on 3 August flies were still evident in the same locations but Paul Bufton noted that the numbers had decreased. Flies were still evident at the neighbouring property and as a result a permit breach has been recorded. (Other potential off site sources of the flies were assessed and no issues were observed).

Natural Resources Wales have been provided with "Pest Control" document from the Quality Manual, Ref QMPC414 and the Pest Control Reports for the past two months.

The Pest Control document is mainly focussed on rodents rather than flies and also considers the issue from a quality point of view rather than from an environmental perspective. The Operator is required to produce a "Pest Management Plan" and submit it to Natural Resources Wales for approval by 18 August 2017. It is recommended that the Operator refers to the document below when producing the Pest Management Plan.

http://www.organics-recycling.org.uk/uploads/article2594/LIT_8177_a04f7c%20%20Fly%20management.pdf

A number of the Pest Control Reports refer to "high" numbers of flies but no additional action appears to have been taken as a result (until Powys CC and NRW became aware of the issue). The Operator should work with the Pest Control Company to ensure that if issues are observed they are actioned as a matter of urgency to minimise the potential impact off site. If high levels of flies are observed the site's notification procedure should be activated and NRW made aware of the issue. The observed high levels of flies on site should have been reported to NRW, breach permit condition 4.3.1. The Operator should ensure that adequate environmental procedures are in place (by 18 August 2017) to ensure the impact of high levels of flies on site is fully assessed in

relation to permit compliance.

The organic lairage waste is stored in two pits at the end of site. Large number of juvenile flies were observed on this waste. The Operator should cover this stockpile to reduce the potential of flies from this area, by 18 August 2017.

The Operator should confirm to NRW the timescales that waste currently remains on site prior to collection by 18 August 2017.

A number of bait stations have been placed around the perimeter of the site. During the visit those stations on the hedge (near the site entrance) and on the trees closest to the "organic" lairage were found to contain the highest number of flies. No bait stations have been placed in the effluent treatment building or in the lairages. It is recommended that the Operator discuss with their Pest Controller the potential to install further bait stations within the locations noted as having high fly activity in July.

Whilst the off site fly issue persists the Operator has agreed that their Pest Controller will spray the neighbouring property. This commenced on 5 August 2017.

The Operator has commenced the spraying of larvicide in the lairage areas. This is being carried out by site staff rather than the specialist Pest Controller used for other work on site. Details of the Larvicide being used should be forwarded to NRW by 18 August 2017. Larvicide, which targets the larvae, takes a number of weeks to work. As the lairage is emptied more regularly, than every couple of weeks, this method may not be effective in the long term and the Operator should assess the root cause of the flies (which have not caused off site complaints in the recent years) and put measures in place to stop the build up of flies as a priority (this will form the basis of the Pest Management Plan).

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0031978**

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	03/08/2017

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.

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			
F4	C3	See CAR form text	18/08/2017
G4	C3	See CAR form text	18/08/2017

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.