

## Compliance Assessment Report

Report ID:  
CAR\_NRW0034782

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

Site	Llangefni prepared meats	Permit Ref	SP3430RL			
Operator/Permit holder	2 Sisters Food Group Limited					
Regime	Installations					
Date of assessment	04/02/2019	Time in	10:00	Out	14:00	
Assessment type	Site Inspection					
Parts of the permit assessed	Odour and Surface Water					
Lead officer's name	Kelk, Matthew					
Accompanied by						
Recipient's name/position	Steve Jones/ Interim HSE Manager	Date issued	11/03/2019			

### 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
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
E3 - Emissions - Surface water	A	
E4 - Emissions - Sewer	A	
F1 - Amenity - Odour	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	
H1 - Resource Efficiency - Efficient use of raw materials	A	
H2 - Resource Efficiency - Energy efficiency	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	0	Total compliance score (see section 5 for scoring scheme)	0
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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

Following recent odour complaints an inspection of the site was undertaken on the 4 February 2019 by Industry Regulation Officer Matthew Kelk.

### Odour

During the visit paper records for the month of January 2019 were checked for all odour abatement equipment on site including:- sludge scrubber, blood scrubber and scald scrubber.

Newly revised procedure for the collection of Animal by Product Waste has been trained out to relevant staff members. Procedure now only allows ABP collection lorries to come to site empty in normal working hours and out of hours if arriving on site part laden with ABP waste.

Emails were shown for arrangements between ABP collection contractors and 2 Sisters Llangefni to fit the newly revised collection procedure above.

During the site walkover all relevant odour abatement equipment was checked and all were functioning correctly.

An offsite odour assessment was undertaken with Steve Jones, Interim HSE Manager, a larium odour was identified offsite downwind of the plant.

NRW was satisfied at the time of the visit that Best Available Technique (BAT) was being employed to abate odour from the plant.

### Surface water

Palin tests are being taken daily of the surface water discharge from site when the factory is slaughtering. Results from December 2018 - date of inspection checked, highest results returned 0.6ppm ammonia on Palin test. 2 recent spot samples of the surface water discharge taken and analysed at laboratory for ammonia, with results of 0.9 and 1.8mg/l shown.

Palin test taken of surface water discharge sample at time of inspection, this returned a zero result.

Due to the considerable amount of work that has been carried out on site, 2 Sisters now consider that the contamination in the discharge identified by the lab analysis is coming from offsite.

NRW are discussing this issue internally and will contact 2 Sisters in the near future regarding this.

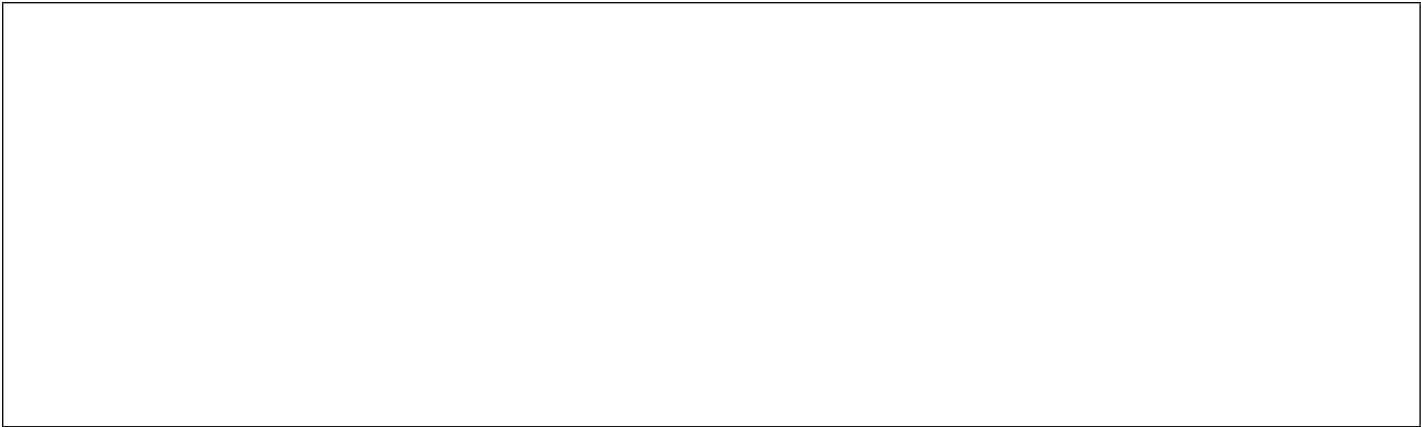
### Reporting for Emissions to Sewer and Water Usage Q3 & Q4

Data reviewed for emissions to sewer for Q3 (July - September 18) and Q4 (October - December 18). Noted no mercury detected. No issues with water usage data provided.

Q1 and Q2 2018 emissions to sewer data also reviewed no issues with data.

### Annual returns

Annual returns (2018) received for energy usage, waste and performance parameters - no issues with submitted data.



## EPR Compliance Assessment Report

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Operator/Permit holder	2 Sisters Food Group Limited	Date	04/02/2019

### 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			

## 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](mailto: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.