

Compliance Assessment Report CAR_NRW0039399

Permit being assessed: BX8289IW.

For: Princes - Cardiff EPR/BX8289IW, held by Princes Ltd

At: Unit 68 Princes Soft Drinks Division - Cardiff Portmanmoor Road Ind. Estate , Cardiff, South Wales, CF24 5HB.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 29/09/2021 between 09:00 and 15:00.

Parts of permit assessed: Reporting and Permitted Operations

NRW Lead Officer: Geraint Harris.

Report sent to: John O'Malley, Health, Safety and Environment Manager on 16/02/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	C3 Minor	Permit condition 1.1.1
A1 - Specified by permit	Ongoing (O)	permit condition 1.1.1
C2 - General Management - Management system and operating procedures	C3 Minor	Permit condition 1.3.1
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4 No impact	permit condition 4.1.3
E4 - Emissions - Sewer	C3 Minor	Permit condition 2.2.2.8
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4 No impact	Permit condition 4.1.5.
C2 - General Management - Management system and operating procedures	C3 Minor	Permit condition 1.3.1
H1 - Resource Efficiency - Efficient use of raw materials	Action only (X)	
H2 - Resource Efficiency - Energy efficiency	Action only (X)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
6	16.2

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
A1	Please explain why the decision to begin operating this equipment was taken without informing NRW	31/03/2022

Criteria	Action needed	Complete by
A1	Please demonstrate that the air quality was acceptable during the period where the temporary boiler was used and that it screened out as insignificant at H1 assessment stage	31/03/2022
C2	Improve management system to reflect the conditions of the permit and ensure management of change processes include liaising with NRW when operations have the potential to have an affect on the environment.	31/03/2022
G4	Update management system to ensure deadlines are met going forward.	31/03/2022
E4	Please undertake a root cause analysis for this breach in cadmium levels with an action plan to ensure such a breach doesn't occur again.	31/03/2022
G4	submit the information required from permit condition 4.1.5.	31/03/2022
C2	Improve your management system to include all permit deadlines	31/03/2022
H1	Please provided a more detailed explanation as to why there has been such a decrease in water and waste efficiency in 2021.	31/03/2022
H2	Please provided a more detailed explanation as to why there has been such a decrease in energy efficiency in 2021.	31/03/2022

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Princes Soft Drink Division

EPR/BX8289IW

On the 29th September 2021, I visited the Princes site for the first time in my capacity as a Senior Officer of Industry and Regulation for NRW. The purpose of the visit was to gain familiarity with the site and to discuss the outstanding reports as required by Princes environmental permit. The site at the time was undergoing significant construction work to increase the manufacturing and storage capacity. During the meeting the outstanding reports were discussed between Princes, ECL and myself. As a consequence, the remaining

reports were finally submitted to NRW in the following weeks. Details of this can be seen in CAR Form CAR_NRW0038914. Following this discussion, I was given a tour of the site by the EHS manager. During this tour it was evident that the operations detailed in a recent permit variation application had already commenced prior to determination.

In February of 2021 NRW received Prince's application for a permit variation. This variation included the following:

- An increase in production capacity from 26,400 litres per hour to 70,400 litres per hour of fruit juice excluding packaging.
- The installation of one new additional natural gas fired boiler and associated emission point, designated as A2.
- The installation of six new emission points (A3-A8) emitting condensate from each filler line.
- The installation of six new emission points (A9-A14) from SIG mini fillers emitting hydrogen peroxide ("H2O2") resulting from the packaging sterilisation process.
- The relocation of the foul sewer emission point, S1, and the associated sampling point.
- The increase in effluent to foul sewer from 200m3/day to 1,200m3/day.

As of 26th October 2021, Prince's permit variation application for the above changes was deemed 'duly made'. This means that NRW had all the information needed to begin determination. Determination is where we assess your application and decide whether or not we can allow for what you've asked for.

However, prior to this Princes emailed NRW on the 31st March asking for a comment on the information in the table below.

ID	Date Opened	Title	Description	Mitigation Strategy	Risk Owner	Raised By	Action Update	Next Steps	Risk Score
R0312	17/06/2020	Environmental permit requirements	A valid environmental permit will be required to legally operate the new plant and equipment installed during CAREX phase 2. The permit will be required at the commencement of the commissioning phase.	Assign generation of the permit application to Key person within Princes	John OMalley	Tina Crocker	31/03/21 - Review risk profile as soon as we understand if we can run under permit deviation or not 24/03/21 - NRW are estimating a current delay of 4 months for allocation for duly making in 2021, therefore, NRW should be in touch at the beginning of June. Applications in 2020 experienced delays of 5-6 months for duly making so hopefully NRW's work queue and the associated delays will continue to reduce. NRW will then aim to undertake the technical determination of your application within the statutory timescales (4 months for substantial variations).	Are we able to operate under a deviation whilst waiting for the permit - JOM to confirm	0.06

Therefore, Princes were aware that a valid environmental permit will be required to legally operate the new plant and equipment installed at the commencement of the commissioning phase. In response to this email NRW stated:

'We have spoken to our Permitting team now and are aware of the variation application you have submitted. As they have explained in their correspondence to you, NRW does not normally allow Installations to operate without or outside the constraints of an Environmental permit and the conditions contained therein. The decision to allow such operations are very rare and done only in cases of extenuating circumstances.'

To that end, in order to begin consideration of this we will require more information. This should include time scales and any reasons as to why you are unable to wait until such a permit is issued. We require enough information to be able to make this decision based on the potential risk posed by allowing an operation to commence without the correct assessments and consultations to be carried out beforehand, as would happen in the permit determination process.

We will endeavour to consider your request as quickly as possible. However, please bear in mind decisions to

approve this type of activity are not normal practice and any operations that take place outside the confines of the current permit would be taken seriously.

I look forward to hearing from you with the information needed to assess your request.'

NRW received acknowledgment of this email, however no further correspondence was received. During my site visit in September, it was evident that all the site changes mentioned in the permit variation and listed above, were already in operation. As you are aware it is an offence under the environmental permitting regulations 2016 (England and Wales) to operate a regulated facility without having a permit in place. NRW would respond to such an event in accordance with our published enforcement and prosecution policy. However, the site is covered by an existing EPR permit. The offence in this case is operating items of plant prior to the variation of the permit taking effect. NRW's decision to pursue enforcement action will be informed by factors such as environmental impact of any operation, existing controls on emissions, the existence of a timely application for a permit and the intent of the offender. Consequently, an email was sent to Princes requesting information on the following points:

- Please explain exactly which piece of plant named in the permit variation has been operated, since their installation.
- Please provide details on when they began operating and for how long?
- Please explain why the decision to begin operating this equipment was taken without informing NRW?
- Please provide me with the daily effluent discharge volumes since the 1st of April?
- It was mentioned during the site tour that an emission test on the new boiler has been undertaken. Please provide NRW with a copy of this.
- Please provide NRW with the details of control measures you have in place to prevent pollution whilst operating the plant stated in the permit.
- I need to make an assessment of the environmental impact of operating prior to being granted a permit. Therefore, please provide me with any pertinent information that may assist me in this assessment.

On the 18th November NRW received responses to the majority of these points. Upon reviewing these, almost all of the changes listed within the permit variation had been commissioned and operated between April and July 2021. Princes have yet to provide a decision as to why they commenced operation of the plant prior to determination and have responded with the following: "a response to the above request is to be submitted in a separate response shortly following review by the Princes EHS Group". However, as already mentioned this is an offence under the environmental permitting regulations 2016 (England and Wales). Therefore, the remaining questions were put to Princes to ascertain the level of enforcement required for this non-compliance. The responses are summarised as follows:

Operation of New boiler:

Princes, with the assistance of a consultancy group undertook a series of air quality monitoring to ascertain the environmental impact of operating the new boiler during this period. I have copied the text from their response in Appendix 1 below. From the work carried out it has been demonstrated that the air quality in the vicinity of the site is predicted to see an improvement under the new configuration when compared to the currently permitted configuration, despite the operation of an additional emission point (i.e., A2). It is considered that this is largely due to the improved dispersion of the emissions from the significantly taller stacks.

Emission Points A3-A8:

Emission points A3-A8 vent steam produced during filling operations. Princes have stated that limited steam is emitted from these emission points as the majority condenses and is collected by a water/steam trap. This

small volume of condensate produced is channelled to the foul water drainage system.

Emission Points A9-A14:

A H1 assessment has been undertaken based on the worst-case foreseeable emissions of H₂O₂ from the proposed emission points A9-A14. This is associated with the packaging sterilisation process and has been submitted as part of the variation application. The H1 assessment concluded that the proposed release does not exceed the 10% short term Environmental assessment Level (EAL) suggested by NRW. Although no long term EAL was provided for H₂O₂, the short term EAL has also been utilised for the long-term EAL. The H1 Assessment shows that the proposed release does not exceed 1% of this EAL. The short term EAL was used as the long term EAL in the interest of being conservative and to demonstrate the significance criteria will not be exceeded for either long term or short-term process contributions.

Further control measures for the extraction points are as follows:

- Maintenance of the extraction systems and discharge points will be undertaken as part of the documented planned maintenance schedule or condition monitoring system; and
- The dosing of H₂O₂ is strictly controlled to achieve the required level of sterility in the process. Too little would compromise sterility levels whilst an excess would impact on product safety or organoleptic quality. The filler machine will produce an error message and stop if the dosing level recorded exceeds the upper limit, therefore, preventing fugitive emissions to air.

Emissions to Sewer - Relocation of S1 and Increased Effluent Volumes:

Princes maintain a certified MCERTS flow meter at the existing S1. Princes has also installed a temporary MCERTS flow meter at the new relocated S1 with associated flow records held with the IMS. As part of the site improvements, a large proportion of the process effluent from product flushing during and end of production flushes is redirected to a wastewater tank to reduce the quantity of process effluent being discharged to foul sewer. Set quantities of caustic ensure careful control of the concentrations of cadmium and mercury in the effluent.

According to Princes; “a number of control measures have been implemented related to the risk of loss of containment or spillage of potentially polluting materials. These controls include:

- Impermeable surfacing to prevent downward migration to land or groundwater;
- Supervision of deliveries and loading and unloading at all times;
- Storage vessels checked prior to unloading to prevent overfilling;
- Integrity testing of all storage vessels by qualified engineers;
- All potentially polluting liquids banded to 110% of the capacity of the largest storage vessel or 25% of the total capacity of storage vessels with the bund, whichever is greater;
- Isolation system to prevent any uncontrolled releases to water;
- Barriers and signs to prevent risk of vehicle collision with storage vessels and bunding;
- Regular site inspections to identify and rectify any spillages or integrity issues;
- Strategic positioning of spill kits (absorbent socks, pads and drain mats) in locations around the installation.
- Implementation and training of all personnel regarding the emergency spill response procedure and incident reporting.”

Process Controls:

With regards to process controls, Princes have stated the following:

- The processing activities are vigorously controlled and autonomous to prevent fugitive emissions. The process equipment benefits from alarms, monitors and controls which enable any malfunctions to be identified immediately and rectified.
- The installation is capable of identifying, holding and preventing the release of any material should

equipment fail.

- Princes personnel are trained in the use of plant and equipment and are present at all times.
- Emergency stop buttons can also be used to halt processes in case of serious fault.
- For a detailed breakdown of all risk management control measures, please refer to the Environmental Risk Assessment (ECL.046.01.01/ERA) which was submitted as part of the variation application.

Taking the above into account as mitigating factors, it has been decided that the operation of items of plant prior to the variation of the permit taking effect will be **awarded two category 3 non-compliance scores (CCS3)**. The first non-compliance is being scored against permit condition 1.1.1. which details the permitted activities Princes are allowed to undertake. This is considered a breach since none of the activities detailed in the permit variation are listed under this permit condition. The second non-compliance score is being awarded against permit condition 1.3.1 'management condition' since there was a failure within the management system to notify NRW and to achieve compliance with the limits and conditions of this permit. This suggests that the management system doesn't have adequate management of change processes to prevent unauthorised operation of the prescribed activities, or the management of change process was not properly implemented due to lack of training/competency/sufficient resources.

Action 1: please provide a response to the following question "Please explain why the decision to begin operating this equipment was taken without informing NRW". Due 31st March 2022.

Action 2: Please provide a response to the following question "Please demonstrate that the air quality was acceptable during the period where the temporary boiler was used and that it screened out as insignificant at H1 assessment stage." Due 31st March 2022.

Annual Returns

Princes are required under permit condition 4.1.3 to submit to NRW a report of the performance of the permitted installation over the previous year, by 31 January each year, providing the information in Tables S4.1 and S4.2 of Schedule 4, assessed at any frequency specified therein, and using the form specified in Table S3 to Schedule 3. On the 1st of February Princes were sent an email reminding them of this permit requirement. A new deadline of February the 14th was put forward in this email. The information provided on the 14th February, was found to be insufficient and a request for further information was made. Consequently, the correct forms were submitted to NRW the following day. **A noncompliance Category 3 (CCS3) is being awarded against permit condition 4.1.3 for failure to submit this report on time.**

Waste:

Hazardous waste tonnages increased slightly in 2021 when compared to 2020 but remains significantly lower than the period 2016-2019. There was a significant increase in non-hazardous waste and the resulting total waste volumes during 2021. This is a result of the implementation of the phase 2 lines 4,5,7,8,9,10, as part of the site expansion. Overall, there was an increase (more than double) in waste for every m³ of product produced. This means that the generation of waste is less efficient. It is unclear if this increase in waste is because of the construction work being undertaken at the site or whether operation of the new lines and associated plant generate considerably more waste.

Action 3: Please provided a more detailed explanation as to why there has been such an increase in the waste to product ratio, Due 31st March.

Water Usage:

Water use has more than doubled in 2021 when compared to 2020 and is the highest since 2015. However, this is to be expected since the site has undergone significant expansion. However, the ratio of water usage to product produced has increased considerably suggesting a decrease in water efficiency.

Action 4: Please provide a more detailed explanation as to why there has been such a decrease in water efficiency in 2021. Due 31st March.

Energy Usage:

Energy usage at the site increased in 2021 when compared to 2020 and the general trend over the past 5 years shows an increasing in energy consumption. When this energy is converted to CO₂ production and compared with the tonnes of finished product the result is a reduced energy efficiency. It is to be expected that the energy consumption would increase due to the site expansion. However, it is not clear why the ratio of CO₂ to finished product has increased. Is part of the reason due to increased energy consumption a result of the construction works at the site?

Action 5: Please provide a more detailed explanation as to why there has been such a decrease in energy efficiency in 2021. Due 31st March.

Sewer:

The monitoring results of the discharges to sewer are submitted annually. Cadmium and Mercury values have decreased since Princes have changed Caustic supply. However, there is a breach in the permitted ELV for Cadmium and its compounds. The permit limited is 0.01mg/l and the result reported by Princes is 0.035mg/l. All other parameters for sewer discharge either don't have emissions limits or are compliant. **A category 3 non-compliance (CCS3) is being awarded for this breach.**

Action 6: Please undertake a root cause analysis for this breach in cadmium levels with an action plan to ensure such a breach doesn't occur again. Due 31st March.

Other permit requirements

Princes are required to submit a summary report as mentioned in permit condition 4.1.5 below. To date this report has not been received. During 2021 Princes were reminded and subsequently penalised for not submitting this information for the preceding years. In 2021 Princes were also awarded a of Category 4 non-compliances for a number of other reports they failed to submit. In addition to this they were also awarded a category 3 noncompliance against their management system for failure to implement a management system that is able to achieve compliance with the limits and conditions of their permit. Unfortunately, the same situation has occurred again. Permit condition 4.1.3 was received past the submission deadline and permit condition 4.1.5 has yet to be received. Therefore, Princes are being awarded a **Category 4 non compliance for failure to submit a response to permit condition 4.1.5**. Furthermore, a **category 3 non compliance is being awarded against permit condition 1.3.1** for failure to implement a management system that is able to achieve compliance with the limits and conditions of their permit.

Action7: please submit the information required from permit condition 4.1.5 by March 31st 2022.

Permit condition 4.1.5:

- 4.1.5 Where the Operator has a formal environmental management system applying to the Permitted Installation which encompasses annual improvement targets the Operator shall, not later than 31 January in each year, provide a summary report of the previous year's progress against such targets.

Appendix 1

Princes response to the question: 'I need to make an assessment of the environmental impact of operating prior to being granted a permit. Therefore, please provide me with any pertinent information that may assist me in this assessment.'

To assess the environmental impact of the currently permitted operations (i.e., A1 at its former flue height and location, with the old building layout (pre-development)) compared to the irregular arrangement of A1 and A2 operating simultaneously at the 20m flue heights, further dispersion modelling was undertaken. Two models were run making use of the modelling setup file submitted as part of the permit variation. The model was modified to reflect the findings of a recent emissions survey and modified to include a scenario that contained the original permitted building layout and emissions characteristics for A1. The emissions characteristics, e.g. stack temperature, efflux velocity, volumetric flow rate and emission rate (for NO₂ and CO) used in the model were obtained from the emissions data gathered during the recent survey (i.e. from the P5003 R001 report).

The results of this modelling have been summarised and provided in Table 1. The modelled results are for the worst-case meteorological year modelled (2017) and provide the predicted process contributions (PCs) for nitrogen dioxide (NO₂) (long-term and short-term) and carbon monoxide (CO), at the point of maximum ground level concentration. These have then been assessed against the respective air quality standards (AQSs) for the pollutants modelled. It can be observed from the results in Table 1, that the environmental impact of the new configuration is an improvement on the exiting permitted configuration. The predicted PC is approximately 3% of the AQS for long-term NO₂ for new site layout and stack heights for A1 and A2 compared to approximately 8% for the permitted configuration.

Table 1 – Comparison of Maximum PCs and Maximum PECs with AQS for Long-term NO₂

Pollutant	Scenario	Stack Height (m)	Worst-Case Met Year	Max PC (µg/m ³)	AQS (µg/m ³)	PC as % of AQS	Location of Max PC		Nearest NO ₂ Background Concentration (µg/m ³)	PEC (µg/m ³)	PEC as a %age of AQS	EPUK / IAQM ^(d) Impact Descriptor
							X	Y				
NO ₂ (annual)	A1 – Old Layout / Former Setup	11.5m ^(a)	2017	3.03	40	7.57%	320449	175704	21.06 ^(c)	24.09	60.22%	Slight
	A1 & A2 – New Layout / Current Setup	20m ^(b)		1.18			320529	175704		22.24	55.59%	Negligible

Notes to Table 1

(a) The approximate height of the former A1 flue was calculated making use of both LiDAR survey data and via information provided by Princes.

(b) The heights as proposed following the stack height screening assessment undertaken as part of the modelling report submitted as part of the permit variation (i.e., ECL046.01.01/ADM – Issue 1(a), August 2020).

(c) Background NO₂ concentration taken from the 2018 DEFRA modelled background location (X: 320500, Y:175500). Available from: <https://uk-air.defra.gov.uk/data/pcm-data>.

(d) Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM): Land-Use Planning & Development Control: Planning For Air Quality (January 2017). Available online via: <https://iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf> (accessed October 2021).

Predicted environmental concentrations (PECs) for long-term NO₂, have also been calculated. The results in Table 1 further demonstrate the improvement in environmental impact with the PEC being described as negligible for the new configuration compared to slight for the existing permitted configuration. As displayed by the results in Table 2, both short-term NO₂ and CO screen out as being insignificant (i.e., the PCs are less than 10% of their respective AQSs) for both the modelled scenarios. However the new configuration demonstrates a further environmental benefit. Consequently, based on above it has been

demonstrated that the air quality in the vicinity of the site is predicted to see an improvement under the new configuration when compared to the currently permitted configuration, despite the operation of an additional emission point (i.e., A2). It is considered that this is largely due to the improved dispersion of the emissions from the significantly taller stacks.

End.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.