

PPC intensive farming - first visit assessment form

Permit reference: FP3836MU	Operator: D MORGAN & CO
CPH number:	Inspector: GERRANT RICHARDS
Inspection date: 10/03/08	Weather on the visit date: WET

- You should address each question. For questions 1 to 22 three possible situations are provided for each question to help you decide if a condition is being met. 'NB' indicates that there is no breach of a condition; 'B' indicates that there is a breach. Record the result in the outcome box.
- Use the comments box after each task to make notes, justifications or improvement suggestions to explain your assessment.
- Any breaches should be recorded on the Integrated Farm Inspection Form and Compliance Classification Scheme (CCS) Database.
- Classify each breach using the CCS score 1 to 4 depending on the potential threat of harm to the environment.
- If a particular question/condition doesn't apply to the installation, indicate this with 'NA' in the outcome box.
- If you don't inspect a particular question/condition on this visit, indicate this with 'NI' in the outcome box.
- A checklist of all suggested pre-visit preparation and post visit communication with the operator is covered in the Environment Officer quick guide PPC intensive farming – first visit and operational instruction PPC intensive farming compliance assessment.

At the installation - checking documents

1. Site entrance identification notice – Permit condition 1.1				Guidance	Outcome
Question	Possible situation (B, NB)		Possible action		
	B	No identification notice.	Identification notice required.		
Is there an identification notice at or near the entrance and does it contain the necessary information?	B	A notice is provided but is incomplete OR not adequately sited.	Additional information must be added to the notice or it should be re-sited as appropriate.	The site identification notice should be easily readable from outside the site in daylight hours and should include the: - emergency contact name and telephone number of the permit holder and/or operator - statement that the site is permitted by the Environment Agency - permit number - Environment Agency national numbers, 08708 506506 and 0800 807060.	
	B				
	NB	A notice is provided with the required information and properly sited.			
Comments	Notice will be provided				

2. Who is in charge? – Permit condition 1.1					Outcome
Question	Possible situation (B, NB)		Possible action	Guidance	
Is it clear who is responsible for ensuring compliance with environmental, legal and/or other environment protection requirements and is there evidence of their competency?	B	No	The permit holder should be able to say who is responsible if they do not have this role.	All staff with responsibilities should be aware of what these are. They should be able to: - ensure legal compliance - communicate relevant information to other employees - check compliance with relevant legislation Evidence of competency could be training records or certificates, curriculum vitae, continuous professional development. Responsibility for compliance may be spread across a number of staff and across various levels of the organisation. Those appointed must be aware of their responsibilities for environmental compliance.	NB
	NB	Yes	Confirm that such a person is in post and meet them. Check it is in their job description.		
	NB	Yes – and it is the permit holder OR a person appointed for their competency and authority.	Check their competency: training records, certificates, curriculum vitae, continuous professional development.		
Comments					

3. Inspection and maintenance – Permit condition 1.1						Outcome
Question	Possible situation (B, NB)		Possible action	Guidance		
Is there an inspection and maintenance programme for structures and plant in place on the site and is inspection/work carried out annually?	B	No	Establish a programme.	Preventative maintenance minimises plant failures and possible pollution/emissions. Inspections should cover: security, correct operation, signs of leakage and corrosion or damage. Damage should be reported and repaired. It is useful to inspect structures when they are empty or partially empty.		
	NB	Yes – all are inspected annually.	Records should show that inspections have been carried out.			
	NB	Yes – annually or more frequently in accordance with manufacturers' guidelines.				
Comments	ACL accredited					

4. Public and complaints – Permit condition 1.1					
Question	Possible situation (B, NB)		Possible action	Guidance	Outcome
Is there a mechanism in place to ensure all environmental complaints received are recorded, investigated and resolved?	B	No, OR complaints recorded but not investigated or resolved.	A recording system must be in place. It should include action taken to resolve the complaints.	Complaints should be logged, investigated and steps taken to resolve the problems.	The system should ensure that information is forwarded to the right people so that action can be taken. Records should show that 'most' complaints are dealt with in an appropriate manner. 'Most' complaints would be more than 50% but less than 100% of complaints. There is further information and a complaints recording form in the farming guidance on odour and noise management.
	NB	Yes, documentary evidence shows all complaints are recorded. Most complaints are investigated and resolved.	Review of effectiveness of actions to try and resolve all complaints.		
	NB	Yes, documentary evidence shows that all complaints are recorded, investigated and resolved.			
Comments					

5. Training – Permit condition 1.1					Outcome
Question	Possible situation (B, NB)		Possible action	Guidance	
Have all relevant employees and contractors received training to achieve legal compliance? Are training records kept?	B	Relevant training not yet received.	All relevant staff must be given appropriate training. A training plan will help ensure this. Records of training must be kept.	Training should include: • how to prevent accidental releases and the actions to be taken should such an accident occur • the accident management plan and duties of staff under it • permit conditions for the installation and how each person's duties link to compliance • the potential environmental effects of the installation under routine and abnormal circumstances • required maintenance of structures and plant	
	B	A training plan has been developed but not all relevant staff have received the necessary training.	All relevant employees or contractors must be trained.	The training should be tailored to the audience, and should focus on the information necessary for their role.	
	NB	All relevant staff and contractors have received appropriate training. Training records are available.	It is advisable to have a system to show that training has given staff the required competency.	After training has been completed, there should be a check that staff have understood it and that it has been effective. Records should show this has been done.	
Comments					

6. Accident management plan - Permit condition 1.2					Outcome
Question	Possible situation (B, NB)		Possible action	Guidance	
Is there an accident management plan and does it include all the environmental risks and hazards associated with the site? Is the plan regularly reviewed?	B	There is no plan.	A plan must be written.	The installation must have an accident management plan. It should identify all environmental hazards and risks and include routine activities which are identifiable and predictable and those arising from emergencies, like fire or flooding.	
	B	There is a plan but it is not regularly reviewed.	A review should be regularly carried out. It should note any changes to the identified risks and planned responses.	Planned action to remove/reduce risk should consider site access, drainage systems, sensitivity of receptors. Details of site locations and contacts of all emergency services and pollution remediation contractors should be displayed. Staff responsibilities and roles should be established and communicated. The plan must be reviewed after an incident and every four years to account for new risks, plant, staff and procedures. Near miss reporting will identify new risks.	
	NB	A plan exists and it is reviewed routinely and after any accident.			
Comments					

7. Energy – Permit condition 1.3					
Question	Possible situation (B, NB)		Possible action	Guidance	Outcome
Have all the major sources of energy consumption been identified?	B	No	All major energy consumption sources should be identified and recorded.	Energy use should be documented. This should include all major sources and amounts used. Sources and amounts should be reviewed and attempts made to reduce usage. A review must take place within four years of permit issue. If the installation is part of the Climate Change Levy Scheme then an energy review is not needed.	
	B	Yes but this has not been formally documented.	Records should show sources.		
	NB	Yes and this has been formally documented.			
Comments	CCL				

8. Raw materials – Permit condition 1.4					
Question	Possible situation (B, NB)		Possible action	Guidance	Outcome
Is a list of raw materials maintained?	B	No	A list of raw materials is needed. This should be reviewed every four years.	Raw materials should be listed and reviewed at least every four years. The list should identify the substance, storage provisions, annual usage, environmental fate and impact. The review should be used to reduce the environmental impact of the raw materials used. The raw materials list should be appended to the accident management plan. The raw materials table provided in the application form can be used as this list.	
	B	Yes but there is no evidence that it is up to date.	The list should show what is currently used and stored on site. This list should be updated when new materials are used and the date recorded.		
	NB	Yes. It is regularly updated and available for inspection.			
Comments	Will be attached to accident plan.				

9. Water use – Permit condition 1.4						Outcome
Question	Possible situation (B, NB)		Possible action	Guidance		
Is water use monitored and recorded?	B	No	Begin monitoring and recording.	Water use should be monitored monthly to monitor consumption and identify leaks. Regular audits should be carried out to try and reduce water consumption. A review of water use must be carried out within four years of the permit issue.		
	NB	Water use is recorded through a meter for the site.	Records should be kept and audits used to spot wastage and reduce consumption.			
	NB	Each livestock house has its own water meter.				
Comments						

10. Avoidance, recovery and disposal of waste – Permit condition 1.5 and 3.2						Outcome
Question		Possible situation (B, NB)		Possible action	Guidance	
Is the production of waste by the activities avoided, reduced and recovered where practicable and disposed of to minimise environmental impact? Are records of waste kept?	B	No	Consider waste streams and begin recording.	Records should be kept and audits used to further reduce waste.	Records of waste produced by the activities on the installation must be kept, and records of waste sent for disposal or recovery. Keeping records of waste will help identify opportunities to avoid/reduce waste being produced and recover waste. A review of waste must be carried out within four years of the permit issue.	
	B	Waste is considered but records are not kept.				
	NB	Waste is considered and records are kept.				
Comments		Waste management plan in place.				

11. Has anything changed since the permit was issued? – Permit condition 2.1					Outcome
Question	Possible situation (B, NB)		Possible action	Guidance	
Have any of the processes significantly changed since the permit was issued and if so have we been informed?	B	Yes, but we haven't been informed.	Check the nature and extent of changes. A variation notice may be required	The processes on site should be those described in the PPC permit. Significant changes may require a permit variation. The site permit holder must inform us of any changes to the permitted processes in terms of method, scale and location. A copy of a variation notice or a letter accepting changes should be available where there have been changes.	
	NB	Yes and we have been informed.	Check the nature and extent of changes and evidence of our agreement required.		
	(NB)	There has been no change.			
Comments					

12. Livestock numbers and movements – Permit condition 2.3.2					Outcome
Question	Possible situation (B, NB)		Possible action	Guidance	
Are records of livestock numbers and movements kept?	B	No	Establish a procedure.	A running total should be available which accurately reflects the site status. It should take account of births, deaths, sales, purchases and movements within business and to other sites. Supporting evidence may be fallen stock removal or incineration records. We need livestock numbers to calculate emissions. Emissions should be reported to us each year.	
	NB	Yes – records are kept for the assurance scheme.			
	(NB)	Yes – records are kept for each livestock room/house.			
Comments					

13. Manure management – off-site disposal – Permit condition 2.3.6					
Question	Possible situation (B, NB)		Possible action	Guidance	Outcome
Is written evidence available of the arrangements in place for exports of slurry and manure – dates, destinations and quantities?	B	No evidence in place.	A recording system is required.	Records could include the quantities and the date of transfer of manure to power stations or biogas plants for recovery; waste water to treatment plants for disposal; or material to a third party for spreading to land. Where manures and slurries are exported for spreading to land, records should include the names and addresses and land acreage available. Where a manure agent is used, there should be confirmation that the third party will spread the manure to land in accordance with the Codes of Good Agricultural Practice for soil, air and water; or that the spreading will be in accordance with a manure management plan for the receiving land.	
	B	There are written records but these are incomplete.	Improve records where necessary.		
	NB	Records are complete and comprehensive.			
Comments					

14. Manure management – on site spreading in accordance with a manure management plan – Permit condition 2.3.7					
Question	Possible situation (B, NB)		Possible action	Guidance	Outcome
Is a manure management plan in place and is it being used?	B	No	A plan must be written and implemented.	The plan should detail which land is suitable for spreading and when spreading can be carried out, and take account for any manures brought onto the installation, including sewage sludge and other organic wastes. The weight and nutrient content applied to each field should be recorded. The manure management plan should recognise whether the farm is in a Nitrate Vulnerable Zone. Arrangements should be in place in case there is an emergency or land becomes unavailable for spreading (disease outbreaks, flooding etc). This could involve alternative land or storage.	
	B	There is a plan but no evidence of compliance.	Records must be kept that show the requirements of the plan are being met.		
	NB	There is a plan and records show compliance.			
Comments					

15. Spreading on own land – manure and slurry nutrient analysis – Permit condition 2.3.1					
Question	Possible situation (B, NB)		Possible action	Guidance	Outcome
Is manure analysed? Does the sampling frequency and analysis method provide accurate information for nutrient management planning?	B	No	Analysis is needed.	Where manure and slurry is spread on own land, they must be analysed to provide information for nutrient management planning. Records should show that analysis is carried out twice yearly, or once per production cycle where that cycle exceeds six months. The analysis should include available nitrogen, total nitrogen, available phosphorus and total phosphorus.	
	B	Yes, but records poor or incomplete.	Improve records and/or sampling procedures.		
	NB	Yes, records good and comprehensive.			
Comments				Not inspected	

16. Spreading on own land – soil nutrient status – Permit condition 2.3.1					
Question	Possible situation (B, NB)		Possible action	Guidance	Outcome
Do the records show that the soil is being analysed every four years?	B	No	Analysis is needed. Records should show that soil analysis is being carried out.	Where manure and slurry is spread on own land, soil must be analysed every four years. Analysis should be for phosphorus as a minimum.	
	B	Yes, but records poor or incomplete.	Improve records.		
	NB	Yes, records good and comprehensive.			
Comments					

17. Spreading on own land – observing organic loadings – Permit condition 2.3.1						
Question	Possible situation (B, NB)		Possible action	Guidance	Outcome	
Do the records show that organic manure is not applied to any field at a rate which would result in the total nitrogen supplied in the manure exceeding 250kg/ha in any 12 month period?	B	Records do not show this.	Establish a procedure	Where the farm is in an NVZ this is already a legal requirement and failure to observe this may result in a loss of some or all of a farm's single farm payment. It may also result in us taking enforcement action. Outside an NVZ, the 250kg/ha limit is recommended by COGAP (Water Code).		
	NB	Records appear to show this but should be improved.	Improve records and/or sampling procedures			
	NB	Yes, records show this and are comprehensive.				
Comments	Not in NVZ					

18. Improvement programme - Permit condition 2.5					
Question	Possible situation (B, NB)		Possible action	Guidance	Outcome
Is the operator working towards meeting the improvement conditions?	B	No	Read the Improvement Programme and begin work.	The Improvement Programme is in Schedule 1, table S1.3 of the permit. It will be site specific but all farms will have an improvement condition to review site drainage and housing within 12 months of permit issue.	
	NB	Yes but timescales unlikely to be met.	Discuss proposals and solutions to meet timescales.		
	NB	Yes, timescales will be met.	Regularly review progress.		
Comments					

19. Site closure plan – Permit condition 2.7						Outcome
Question	Possible situation (B, NB)		Possible action	Guidance		
Is there a site closure plan and is it maintained?	B	No	A plan should be developed and a process established to keep it up to date.	The aim of the site closure plan is to ensure that the site can be decommissioned to avoid any pollution risk and return the site to a satisfactory state. The plan should be reviewed and maintained to ensure that it takes account of pollution risks that may arise due to changes in the site's operation. Any pollution incidents that occur and associated remedial action should be recorded in the plan. Dates of reviews should be recorded and a responsible person named in the records.		
	B	Yes, a site closure plan has been developed but it is not maintained.	The closure plan must be kept up to date and include anything that might compromise the site at closure.			
	NB	Yes, there is a site closure plan. It is updated regularly and includes all required information.				
Comments	No plan in place					

20. Odour – Permit condition 3.4

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Question	Possible situation (B, NB)		Possible action	Guidance	Outcome
If an odour management plan is required, is one in place and is the farm being operated in accordance with it?	B	A plan is required but is not in place.	A written odour management plan must be produced.	An odour management plan is needed if there's a sensitive receptor within 400m or a history of substantiated complaints. The written plan should include a list of odour sources, and the actions to be taken to address the problems. It should take into account abnormal circumstances such as site clean outs or manure/litter transfer. The plan should be updated if further problems arise, and there should be evidence that the root causes of the odour have been identified and remedial action planned. There should be evidence of responding to complaints.	
	B	There is a plan but no evidence to show compliance, or odour sources are missing.	Records are needed to show that planned action is being taken. Any missing odour sources should be added.		
	NB	There is a plan and records show compliance.	Further action may be needed if complaints are received.		
Comments					

21. Noise – Permit condition 3.5

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Question	Possible situation (B, NB)		Possible action	Guidance	Outcome
If a noise management plan is required, is one in place and is it being followed?	B	A plan is required but is not in place.	A written noise management plan must be produced.	A noise management plan is required if there's a sensitive receptor within 400m or a history of substantiated complaints. A written plan should show all noise sources and the steps taken to reduce noise levels. Early morning or late evening operations are likely to attract most complaints. The plan should consider this. (In exceptional circumstances there may be a specific improvement condition requiring certain noise levels are met).	
	B	There is a plan but no evidence to show compliance, or noise sources are missing.	Records are needed to show that planned action is being taken. Any missing noise sources should be added.		
	NB	There is a plan and records show compliance.	Further action may be needed if complaints are received.		
Comments					

22. Records – Permit condition 4.1					
Question	Possible situation (B, NB)		Possible action	Guidance	Outcome
Is a system in place to ensure that records required by relevant legislation are maintained in an appropriate format and for a sufficient length of time?	B	No, or no records show this.	A system is needed to store and record the necessary information.	A record system should be in place. It should detail which records should be kept and the retention time to meet legal requirements. All relevant records identified must be in the system. Records will include training, maintenance, incidents and complaints.	
	B	All the documentation is in place but there's no formal system that describes what to keep and for how long.	A system is needed to store and record the necessary information.		
	NB	All relevant records are kept and the system ensures legal requirements are met.			
Comments					