

Compliance Assessment Report CAR_NRW0039507

Permit being assessed: DP3030ZC.

For: PB Gelatins EPR/DP3030ZC, held by PB Gelatins UK Limited

At: Unit A6 Severn Road , Treforest Industrial Estate, Pontypridd, Rhondda Cynon Taf, CF37 5SQ.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 23/02/2022 - 04/03/2022.

Parts of permit assessed: Energy/water/waste efficiency

NRW Lead Officer: Geraint Harris.

Report sent to: Julie Campbell, Health, Safety and Environment Manager on 04/03/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
H1 - Resource Efficiency - Efficient use of raw materials	Assessed (A)	
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Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

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?

No action required.

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.

At this time, we do not intend to take any further action.

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

PB Leiner

Permit EPR-DP3030ZC.**Energy:**

As a result of the decline in energy efficiency in 2021, PB Leiners were requested to undertake an energy review of the site. This was requested to identify any areas where improvements on energy efficiency can be made. Following this, PB Leiners submitted an Energy Consumption and Energy Efficiency Review. This review is a 4 yearly permit requirement under condition 1.2.1.

PB Leiners have a number of measures already in place to improve energy efficiency including planned preventative maintenance and replacement of old plant and equipment with more efficient ones. Other practices to reduce energy consumption include the maintenance and lagging of onsite pipework and work practices such as switching off electronic equipment when not in use. However, from reading the review it is clear that energy use is related, to a certain extent, to the quality of ossein received at the Installation. On the years where the quality has been poorer there has been an increase in energy usage to try and extract the gelatin. According to PB the quality of ossein was poorer than the previous year and is part of the reason for increased energy use in 2021.

With regards to improving the energy efficiency of the installation PB state that in 2021, a new initiative for continual improvement has been set up at Group Level. Furthermore, a regional manufacturing excellence manager from the PB Gelatins Brazil Production Unit has been transferred to the UK to review all performance and introduce Installation wide efficiency measures at the Treforest site.

PB Gelatins have also recently implemented the Toyota Production system, aiming to better identify and evaluate energy consumption at the Installation. Implementation of the Toyota Production System has resulted in the '7k Project' designed to increase production rates. The project, which involved the installation of new equipment in 2021, aims to reduce energy consumption by maximising process efficiency. It is estimated that energy savings of 5-10% per tonne of gelatin produced will be observable from 2023. Finally, an external company, Spirax Sarco have also been commissioned to undertake an energy audit at the Installation in 2022. This will aim to further identify where energy savings can be made at the PB Leiners installation. NRW look forward to reviewing the resulting findings and action plan.

Use of Raw Materials:

PB's annual report states 'A review to identify whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water will take place on a yearly basis'. PB Leiners were asked to provide a copy of their most recent review along with measures undertaken to try to reduce raw material and water use. PB responded by submitting a raw materials review which fulfils permit condition 1.3.1 on efficient use of raw materials.

As with the energy efficiency, raw material usage including water, is also related to the quality of ossein. During periods of lower quality ossein additional processing is required to extract the gelatin from the bones. In addition to this, consumption of some chemicals used in the extraction of gelatin, including lime, increased over the 2017-2021 period. This is the result of all alkaline treatment being carried out at the Treforest site (prior to this, part of the alkaline process was conducted in Belgium). There is also an observable increase in the consumption of sodium hydroxide at the site over the 2017-2021 period, this can be accounted for by the use of an improved liming recipe. This process enables ossein to be treated more quickly, reducing the requirements of water and electricity. As a consequence of this sulphuric acid consumption has increased during this period. Going forward PB state that the efficient use of raw materials including water will come under the responsibilities of the regional manufacturing excellence manager from Brazil. Also, the 7k project, mentioned earlier, aims to reduce water consumption per tonne of gelatin produced by 5-10%. Finally, PB have stated that in the future they plan to investigate water recovery system which will use clean and warm water from the extraction area to treat ossein. The report fulfils permit condition 1.3.1 and is accepted.

Waste Avoidance, Recovery, and Disposal Review:

PB Leiner completed a 'Waste Avoidance, Recovery, and Disposal Review' as required by permit condition 1.4.2. As with energy and raw materials usage, the amount of waste generated is also affected by the quality of the delivered ossein. During periods of lower quality ossein, greater processing is required and hence increased waste is generated. This was the case for 2021 and explains the reason for a higher waste to gelatine product ratio. PB have put forward the following recommendations following this review:

- continue to implement the Planned Preventative Maintenance ("PPM") including regular inspection, maintenance and cleaning in order to ensure continued efficiency of production and treatment activities.
- continue to record and analyse waste data as part of the EMS including during management meetings and reviews; and
- as part of the EMS, regularly review the use and type of process and treatment chemicals available and investigate the possibility of substituting with any suitable ones with an improved environmental profile. Due consideration must still be given to the ability to successfully eliminate bacteria and pathogens during treatment processes.

Furthermore, just like energy and raw materials, waste avoidance, recovery and disposal will fall under the remit of the new regional manufacturing excellence manager from the PB Gelatins Brazil Production Unit. They will aim to review all performance and introduce installation wide efficiency measures at the Treforest site. Finally, PB Gelatins have also identified an opportunity to recover additional gelatin from the process and a project is being implemented to achieve this. Following completion of the project, ossein waste is expected to be reduced by up to 25%. The project is set to conclude in 2022, with improvements in yield expected to be observable from 2023. NRW welcomes this news and the 2% waste reduction target on 2021 totals. This review has been accepted as complying with permit condition 1.4.2.

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.