Cyfoeth Naturiol Cymru Natural Resources Wales

Compliance Assessment Report

Report ID: CAR_NRW0031537

This form will report compliance with your permit as determined by an NRW officer					
Site	Clwyd Breakers Ltd	Permit Ref	NP3290VM		
Operator/Permit holder	Clwyd Breakers Ltd				
Regime	Waste Operations				
Date of assessment	01/03/2017	Time in	10:15	Out	11:30
Assessment type	Site Inspection				
Parts of the permit assessed	Permitted Area				
Lead officer's name	Sowerby, Andrew R.				
Accompanied by	Challender, Paul				
Recipient's name/position	Neil and Joanne Bennett/ Owners	Date issued	27/04/2017		

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
A1 - Specified by permit	C3	2.4.1
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	C3	3.1.3
	C3	1.1.1
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	C3	2.5.1
D1 - Incident Management - Site security	A	
D2 - Incident Management - Accidents, emergency and incident planning	A	
E2 - Emissions - Land and groundwater	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	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	**4**	**Total compliance score** (see section 5 for scoring scheme)	16

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

The site inspection was pre-arranged. The main objective of the site inspection was to check if Clwyd Breakers Ltd had completed all the actions set out in the previous CAR form (CAR_-NRW0026832) issued for an inspection on the 13th December 2016. Other aspects of the permit and relevant waste legislation would also be looked at.

These actions included:

1. Ensuring all waste ELVs and other waste is being stored and treated within the permitted area at all times.
2. All ELVs depolluted fully where appropriate
3. All oil leaks and spills cleaned up
4. The mound of car parts and any loose parts should have been dealt with and all car parts now stored in designated containers and oil contaminated parts stored in an area with impermeable surface and a cover
5. Bunded area should be completely sealed and all potentially polluting liquids stored appropriately
6. Batteries stored within an appropriately sealed container with a lid or undercover
7. A copy of Neil's continuing competency test to show he has recently passed the test or records to show you have cover by an appropriately technically competent person and they are attending site for the minimum required amount of time.
8. Register as a hazardous waste producer
9. All depollution activities should now be occurring within the depollution building and measures should have been put in place to ensure no contaminated runoff will leave the permitted area, especially around the gateway.
10. Environment Management System

The deadline for the above actions was set as the 28th February 2017. These actions will be dealt with in order within this report. Any other issues observed during the site inspection or any guidance that needs to be provided will be provided after this. If any breaches were observed they will be detailed in the relevant section.

I was accompanied on this site inspection by Environment Officer Paul Challender. We met both Neil and Joanne Bennett on site. We were accompanied at all times on the site inspection by either one or both of Mr and Mrs Bennett. The weather at the time of the inspection was dry.

1. <u>All Waste ELVs and Other Waste Accepted Onto Site Stored and Treated Within the Permitted Area</u>

The storage of waste ELVs outside the permitted area has been an issue at the site for some time. Despite observing a number of ELVs parked up outside the site that we were initially

suspicious of (see photos 1 to 5) we were informed by Neil and Joanne Bennett that they were not waste and that they were to be either repaired or exported as cars to be used as cars. Some of these cars contained significant amounts of car parts which we were also informed were due to leave site.



Photo 1



Photo 2



Photo 3



Photo 4



Photo 5

During the last inspection the storage of other waste items on site was highlighted, as both waste ELVs and other car parts were observed to be overflowing onto the earth bund that runs along the northern boundary of area B. This earth bund is, according to the environmental permit, outside the permitted area. As a result no waste accepted onto the site should be observed in this area. In addition to being outside the permitted area the earth bund would be regarded as permeable and any spills or leaks would cause pollution. On this occasion it was observed that some attempt had been made to remove waste from this earth bund but that there was still a considerable amount of tyres and other waste car parts outside the site boundary against the bund. It was difficult to gauge the actual quantity of tyres and parts outside the permitted area as access to that part of the site was extremely difficult.

As a result of these waste tyres and waste car parts being outside the permitted area the following breach has been applied.

A1 – Specified by permit – Condition 2.4.1 – CCS Cat 3

Condition 2.4.1 of your environmental permit states that “The activities shall not extend beyond the site, being the land shown edged in green on the site plan attached to the permit.” I have included below a copy of the site plan taken straight from your environmental permit. This plan clearly shows the site boundary to be along the concreted area and does not include the bunded area. The cars outside the site boundary were questioned during the site inspection and it was explained that none of these were waste as they were to be exported as cars. However, the presence of waste tyres and other waste car parts outside the site boundary along the northern edge of area B was observed and this is regarded as a breach. On this occasion it is a CCS 3 breach.

Absolutely no waste accepted at the site must be stored outside the permitted area at any time. As either waste ELVs or other waste car parts have been observed outside the site boundary for the last few months we have no other option than to formalise a deadline by which this must be dealt with. **The enforcement notice accompanying this inspection form has a deadline of 14th July 2017 by which the waste outside the permitted area must be cleared.**



Site Plan taken from the Environmental Permit. The green lines show the site boundary

2. <u>All ELVs on Site Fully Depolluted Where Appropriate</u>

ELVs were checked within area A of the site. Only depolluted ELVs should be found in this part of the site. The only hazardous components that these ELVs are still allowed to contain, due to a Wales wide NRW position, are shock absorbers that haven’t been drained and airbags. The shock absorbers and airbags still potentially have a value un-depolluted and as a result they will only need to be removed, drained or deployed before the ELV finally leaves site. During the site inspection Environment Officer Paul Challender and I separated and checked ELVs at random. It was explained that there is now a member of staff who is responsible for ensuring all ELVs are fully depolluted. In total approximately 12 ELVs were checked in area A. Out of all the ELVs

checked the below were found

- Red Citroen Picasso Y227 MFM (see photos 6 and 7 below) was found to still contain engine oil, brake fluid and power steering fluid.
- Two other ELVs found to still contain oil filters (one diesel and one petrol)

Whilst on site Neil Bennett asked an employee to depollute the Citroen Picasso.

As one ELV was found completely un-depolluted and two ELVs were found to still have oil filters a breach has been applied.

C4 – Storage, handling, labelling and segregation – Condition 2.5.1 – Cat 3

Permit condition 2.5.1 refers to article 6(1) of the End-of-Life Vehicle Directive. The directive specifies that prior to treatment ELVs should be stored on an impermeable surface with sealed drainage. Therefore no un-depolluted ELVs should be stored on the permeable hard-standing within area A.

As a total of three ELVs were found to have not been fully depolluted a CCS 3 breach has been applied on this occasion.

Both Neil and Joanne Bennett seemed to be very disappointed that any un-depolluted ELVs had been found and they took immediate action to ensure that the ELVs identified were dealt with. **All effort needs to be made to ensure no un-depolluted ELVs are found in an area without impermeable surface and sealed drainage again. A final deadline has been included within the accompanying enforcement notice of 14th July 2017.**



Photo 6



Photo 7

3. Oil Leaks and Spills

During the site inspection no obvious leaks or spills were observed in area A. In area B it was observed that the ground had a significant amount of oil on it and that the area around the vehicle depollution area had sawdust on the ground. It was explained that the sawdust is placed on the ground to capture any spills that might occur and is cleared up when it needs to be. Although area B should have an impermeable surface with sealed drainage all spills and leaks should still be cleaned up where possible to avoid any oil etc being tracked off site by the regular foot and vehicle traffic passing through the site. No breach has been applied on this occasion but future actions should include ensuring any oil spills and leaks are cleared up in area B as well.

4. Appropriate Storage of All Clean and Contaminated Car Parts

One of the main issues on site in recent months has been the inappropriate storage of car parts. The lack of storage of car parts removed from ELVs in designated containers or on racking has

been highlighted on a number of occasions over recent years. However, since August 2016 a large mound of car parts has developed on site and despite being observed to be slowly decreasing in size since December 2016 it still hasn't been dealt with. The parts in this mound have been observed to be oily in appearance and it is likely that they should be disposed of as hazardous waste due to the level of contamination.

Some effort had been made before this inspection to try and store parts in containers. However, despite being told otherwise during the inspection it was obvious on site that the containers on site were insufficient to contain all the car parts and there were still considerable amounts of parts overflowing out of the skip or strewn around the site (see photos 8 to 11 below). Parts were also observed being stored within vehicles on site.



Photo 8



Photo 9



Photo 10



Photo 11

We also observed a number of engines stored on the ground in area B. According to the ELV directive any oil contaminated parts should be stored on impermeable surfaces and undercover to prevent rainwater washing the parts. Most of the engines observed stored on the ground were not covered. We were informed that these engines were to be taken off site by the end of the week. They should be stored undercover or within a sealed container until this happens.

B4 – Containment of stored materials – Condition 1.1.1 – CCS Cat 3

Permit condition 1.1.1 states that "The operator shall manage and operate the activities: (a) in accordance with a written management system…."

Section 4 of the most recent Environment Management System (received on 22nd February 2017) states "all materials/components will be stored either in the depollution building within area B or stored in designated containers pending collection". In addition this section also states that "salvaged engines and other parts will be stored in a designated area in area B"

As parts are not being stored in designated containers, oily parts are not being stored appropriately and there is no designated area for these parts, including salvaged engines, a CCS 3 breach has been applied. **All parts must be stored appropriately at all times.**

The enforcement notice accompanying this inspection form has a deadline of 14th July 2017 by which we would expect to see all parts stored appropriately.

5. Bunded Area Sealed and Potentially Polluting Liquids Stored Within

The bunded area has been constructed with breeze blocks. As breeze blocks are considered to be porous they required sealing. This has now been done and the bunded area can be regarded as fully sealed.

However, it was observed during the inspection that there were potentially polluting liquids being stored outside the bunded area (see photo 12 below)



Photo 12

These liquids were beings stored within IBCs and a blue drum and should have been stored within the bunded area. The following non-compliance has been recorded.

B4 – Containment of stored material – Permit Condition 3.1.3 – CCS Cat 3

Permit Condition 3.1.3 states that "All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container"

A CCS 3 breach has been recorded due to the drum and IBCs stored outside the bunded area.

All potentially polluting liquids on site must be provided with secondary containment by 14th July 2017. This deadline has been included within the accompanying enforcement notice.

6. Batteries Stored Within Appropriately Sealed Containers With a Lid or Undercover

No batteries on site to check. The site has a battery box with a cover for storage of car batteries.

7. Technically Competent Person for the Site

As has been stated in numerous past inspection forms, the WAMITAB certificate that Neil had expired at the end of February 2016. Despite these repeated reminders, the continuing competency test had not been undertaken by Neil and as a result the site was operating without a "technically competent person". As a result we were informed on the 3rd April 2017 that Roger Hudspith had agreed to provide TCM cover until Joanne Bennett had completed the relevant qualification. Since then Joanne Bennett has been in contact to inform us that she has completed and passed the continuing competency test.

A copy of the continuing competency certificate gained by Joanne Bennett was received on the

26th April 2017.

No CCS score will be applied on this occasion. However, we do have some questions regarding whether the continuing competency certificate is enough to satisfy permit condition 1.1.4 as we are of the understanding the Joanne Bennett has not completed the primary WAMITAB qualification. Should I have further information regarding this I will be in contact.

Please ensure that any dates the technically competent person is on site are recorded. This should also include the amount of time spent on site. There is a minimum requirement for time spent on site by the TCM and this needs to be met.

8. Register as a Hazardous Waste Producer

Hazardous Waste Registration Number CAD600 was registered on the 27th February 2017. Please ensure that this registration is renewed before it expires on the 26th February 2018.

9. ELV Depollution Activities Undertaken Within the Depollution Building and Measures in Place to Ensure No Contaminated Runoff Will Leave the Permitted Area

It was stated on site that all ELVs are now being depolluted within the depollution building. We also discussed the measures the site intends to put in place to ensure that the area around the gate and the depollution building is fully sealed to prevent any runoff from leaving site. They are currently looking at installing a trench drain across the entrance to the site. This may connect to the site drainage so that any runoff is redirected towards the oil interceptor. It was pointed out that due to the traffic across this trench drain there would be a requirement for regular maintenance to ensure it is kept clear.

As area B should have sealed drainage to allow you to treat and store un-depolluted ELVs you need to undertake these works as soon as possible. **You should therefore provide a timetable of the works you intend to do to ensure the site is sealed and no runoff can leave site by the 14th July 2017**.

10. Environment Management System

Version 3 of the sites Environment Management System (EMS) was submitted to NRW on 22nd February 2017. This updated EMS was requested as the previous EMS was deemed to no longer apply to the site as it operates now.

A review of version 3 of your EMS has been done and although it is a better reflection of the site than it was, it still lacks some detail needed to address risks of pollution. The list is only a brief overview and there may be other issues not identified:

- Section 1.5 and section 4 both contain a table that includes permitted waste types and maximum quantities. These tables should be merged. They should also include an accurate reflection of the quantities on site. Currently one of the main issues is that there are too many ELVs stored on site. The quantity of cars stored on site should be the maximum quantity the site can deal with and still operate without resulting in non-conformances or risk to the environment. The quantity of other wastes on site should also reflect this. The table in section 4 also lists ferrous and non-ferrous metals as permitted waste types. Your permit does not allow you to accept ferrous and non-ferrous metals on site. You are only permitted to accept the waste types listed within your permit.

- The EMS should also include maximum storage times for the waste held on site. These

storage times should be appropriate to the waste types. They may also be regarded as a control measure to help limit the amounts of waste on site.

- Within Section 2.9 you detail some of the activities that take place on area B. Within this you mention a baler which, as far as I am aware, is no longer on site. It is also mentioned that a lot of equipment is stored under the canopy of the depollution building. Please ensure that this is accurate. Not everything needs to be stored within the depollution building and if there is no risk from certain items being stored outside then there will be no concerns raised. The size of the depollution building will limit how much you can store within it.

- In Section 3 an acceptance criteria is mentioned. What is this? Is this the same for both householders and businesses?

- There are no details referring to the fact that airbags and shock absorbers are usually left intact on the ELVs when they are stored in area A. This should be detailed and the action taken to ensure they have been removed, drained or deployed before the ELV leaves site.

- A common issue on site is the number of ELVs you have and the lack of space when you have too many. The EMS needs to address this risk. There needs to be control measure in place to ensure the site never has too many waste cars on site. If these control measures fail then staff on site should be prepared to close the site to accepting any new ELVs until there is space available again.

- You need to have a site drainage plan for the site that shows the location of the interceptor and sump and the location of all manholes, grids etc. It should also show were the nearest watercourses are located, especially if they run along the edges of the site.

- In the past you have stated that sometimes waste ELVs are found left outside the site. A procedure for what is done in these situations should be included.

- Occasionally some cars on site are exported. It would be useful to detail a system on how this is done that includes a way to clearly identify the cars that are to be exported.

- A list of the daily, weekly and monthly checks undertaken at the site should be provided and the way in which they are recorded. i.e. drainage checks, oil interceptor checks, security checks, litter picks etc.

It is important that you manage and operate activities on site “in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints”. This essentially means that the EMS should address any issues that occur on site. For example if waste storage is an issue then the EMS should set a reasonable limit on the quantities allowed on a site and these limits must then be adhered with. The EMS should also detail how certain situations can be dealt with, for example, drainage problems, fires, unacceptable wastes, vandalism etc.

I have directed you towards guidance on environment management systems before. If you need a reminder please let me know and I can send you some links.

The deadline by which I would expect to see an appropriate EMS submitted to us is the 14th July 2017. This deadline has been included within the attached enforcement notice.

Please feel free to consult with me at any point before the deadline.

Other Advice and Guidance

During the site inspection we discussed the movement of the car parts that are referred to in section 4 above. In particular we discussed the car parts that were removed from site by Jeremy Wells. I was informed that you did not have any waste transfer notes for these car parts but that they had been sent to Entrec. This led to a discussion on the requirement for waste transfer notes and hazardous waste consignment notes for all waste that leaves site.

Any waste that leaves site must be accompanied by either a waste transfer note or a hazardous waste consignment note. Examples are below:

Waste transfer note – depolluted ELVS (vehicles shell EWC 16 01 06), tyres, plastic, glass, general waste, clean metals

Hazardous waste consignment note – un-depolluted ELVs (16 01 04), oil filters, oils, explosive components (i.e. airbags), brake fluids, antifreeze fluids, catalytic converters, any oily parts, oil contaminated sawdust.

If any of the above components are leaving site to be used for their original purpose, (i.e. airbags to be used as airbags again) then they will not need to be consigned as waste. You should, however, keep a record of their sale that includes quantities.

The above list is not the complete list but is a rough guide. There will be other wastes you generate on site that as the producer you will have to identify for yourself.

On site you mentioned that you had also sold some waste tyres to a farm to be used on their silage clamp. As long as that farm has a U8 exemption registered then this is not an issue. The U8 exemption allows the farm to use up to 40 tonnes of tyres as a weight on cover sheeting only. It is your responsibility to check if the farm has this exemption registered before you send the tyres there. Waste transfer notes will be required for this movement of waste.

Something you should bear in mind is that the **ELV Directive requires you to carry out depollution of end of life vehicles as soon as possible upon receipt.** This therefore means that we would not expect to find large amounts of un-depolluted ELVs on site regardless of whether they are stored on permeable or impermeable surfaces. This means that there should only ever be a small number of un-depolluted ELVs on site that have only recently been accepted. Storage of large numbers of un-depolluted ELVs is also regarded to be a fire risk by both ourselves and the Fire and Rescue Service.

Summary

- All waste accepted, stored and treated on site must be stored within the permitted area at all times. An enforcement notice stating a deadline by which we expect to see this has been served and accompanies this form.
- Ensure all ELVS not stored on an impermeable surface with sealed drainage have been depolluted by the deadline stated in the enforcement notice. An enforcement notice stating a deadline by which we expect to see this has been served and accompanies this form.
- All areas of the site should be kept clear of oil leaks and spills.
- All clean and contaminated car parts need to be stored appropriately by the deadline within the accompanying enforcement notice.

- All potentially polluting liquids must be stored either within a bund or alternative secondary containment. An enforcement notice stating a deadline by which we expect to see this has been served and accompanies this form.
- You should ensure that attendance and the time on site is recorded by the technically competent person.
- Review your Environment Management System and update it to ensure that it addresses all recognised risks on site. An enforcement notice stating a deadline by which we expect to see this has been served and accompanies this form.
- A timetable for any improvement works on the sites drainage should be submitted to NRW by the 14th July 2017.

The deadline for all work on site has been set as the 14th July 2017 to align with the enforcement notice that is being served with this inspection form.

Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	**Report ID: CAR_NRW0031537**

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

Site	Clwyd Breakers Ltd	Permit Ref	NP3290VM
Operator/Permit holder	Clwyd Breakers Ltd	Date	01/03/2017

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.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

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			
A1	C3	No waste accepted at the site must be stored outside the permitted area at any time	14/04/2017
C4	C3	Ensure no undepolluted ELVs are found in an area without impermeable surface and sealed drainage.	14/07/2017
B4	C3	All potentially polluting liquids on site must be provided with secondary containment	14/07/2017
B4	C3	All parts must be stored appropriately	14/07/2017

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.