

Compliance Assessment Report

Report ID:
CAR_NRW0032547

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

Site	Summerleaze Pet Crematorium	Permit Ref	CP3595SX		
Operator/Permit holder	Summerleaze Pet Crematorium Ltd				
Regime	Waste Operations				
Date of assessment	22/11/2017	Time in	10:55	Out	12:00
Assessment type	Site Inspection				
Parts of the permit assessed	C1, C2, F1, F2, G4				
Lead officer's name	James, Ian				
Accompanied by	Griffiths, Neil				
Recipient's name/position	Mark Hinds/ SHE Manager	Date issued	30/11/2017		

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
C1 - General Management - Staff competency/training	C4	Permit Condition Part 1.1.4 – The operator shall comply with the requirements of an approved competence scheme or shall hold an appropriate certificate of technical competence or other approval issued by the agency.
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4	Permit Condition Part 4.3.4 (a) The Agency shall be notified within 14 days of the occurrence of the following matters, except where the disclosure is prohibited by Stock Exchange rules: Where the operator is a registered company: (a) any change in the operator's trading name, registered name or registered office address

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**

2

Total compliance score
(see section 5 for scoring scheme)

0.2

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

Introduction

At 1100 on 22nd Nov 2017 your site was inspected as part of the routine assessments for compliance, your new regulatory officer, Ian James, was in attendance along with fellow officer Neil Griffiths. Thanks to Kay for taking the time to demonstrate your activities on site.

Your operation consists of a Pet Crematorium in the Magor area.

The parts of the permit that were reviewed were;

C1 – General Management: Staff competency/training

Permit Condition Part 1.1.4 – The operator shall comply with the requirements of an approved competence scheme or shall hold an appropriate certificate of technical competence or other approval issued by the agency.

In addition reference: Natural Resources Wales publication – 'How to comply with your environmental permit' Part 2 – Waste Operations, Technical Competence Schemes.

It was noted that there is no current Technically Competent Manager.

BREACH – CATEGORY 4

Action: Provide a plan with timescale to address this issue, by 24th December 2017.

C2 – General Management: Management system & operating procedures

Permit Condition Part 1.1.1 (a)– ‘The activities shall be managed and operated: (a) in accordance with a management system which identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents and non-conformances.....’

A copy of the Management System was available.

Action: Please supply by email by 24th February 2018.

G4 – Monitoring and records, maintenance and reporting: Reporting and notification

Hazardous Waste returns are being submitted but general waste returns have not been received since April 2015. No breach will be recorded at this stage.

Action: Please complete all 2017 returns by 24th February 2018.

Permit Condition Part 4.3.4 (a) The Agency shall be notified within 14 days of the occurrence of the following matters, except where the disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- a. any change in the operator's trading name, registered name or registered office address

No notification has been received since the change of registered address, as recorded in Companies House, in April 2016.

BREACH – CATEGORY 4

Action: Complete appropriate Permit Application/Variation by 24th February 2018.

Observations;

1. Following the site visit Mark Hinds confirmed that the incinerator capacity was 49kg/hr and did not fall under requirements to be regulated as an installation under the local authority control. A certificate was provided.

Other;

A tour of the site showed infrastructure in good order. Paul Scott, as unit manager, showed detailed knowledge and understanding of the operational side of the business.

If you have any questions regarding this Compliance Assessment Report (CAR) form, please contact Ian James on 03000 654203 or via email on ian.james@naturalresourceswales.gov.uk



EPR Compliance Assessment Report

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Site	Summerleaze Pet Crematorium	Permit Ref	CP3595SX
Operator/Permit holder	Summerleaze Pet Crematorium Ltd	Date	22/11/2017

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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

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			
G4	C4	Complete appropriate Permit Application/Variation	24/02/2018
C1	C4	Provide a plan with timescale to address this issue, by 24th December 2017	24/12/2017

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.