



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

Site	Escrick Aggregate Treatment Plant		Permit Ref	402437		
Operator/ Permit holder	ESCRICK ENVIRONMENTAL SERVICES LIMITED					
Date	24/11/2023		Time in	13:00	Out	14:20
What parts of the permit were assessed	Methane Emissions Survey and Review of Compliance Action Plans					
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge
Recipient's name/position	Craig Brown (TCM)					
Officer's name	Robin Bispham, Anthony Sorrell		Date issued	12/12/2023		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations (EPR). A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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			Condition(s) breached
a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	A	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	A	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates & litter	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),
A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored
MSA, MSB, TCM = Management System condition A, Management System Condition B and Technically Competent Manager condition which are environmental permit conditions from Part 3 of schedule9 EPR (see notes in Section 5/6).

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

1.0 Scope

This CAR Form records the findings of a methane emissions survey that was carried out on 24 November 2023. The survey was carried out as part of a wider survey that also covered the adjacent Escrick Environmental Services Ltd inert landfill site (permit EPR/ZP3835JD [EAWML406424]) and Acumen Waste Services Ltd Escrick Waste Treatment Facility site (permit EPR/KB3739AJ [EAWML104658]). The survey followed a similar survey that was carried out on 23 June 2023. Escrick Environmental Services TCM, Craig Brown, was present during the survey.

The CAR Form also contains a consolidated summary of compliance action plan submissions made by Escrick Environmental Services Ltd in response to the compliance issues identified in CAR Form 402437/0464481.

2.0 Methane Emissions Survey

2.1 A methane emissions survey, similar to the one carried out on 23 June 2023, was carried out using a Geotech TDL 500 methane detector. On this occasion our GPS data-logging system was available and so this was used throughout the survey to log the data. The TDL works on the principle of infrared absorption spectroscopy to detect surface methane concentrations at the parts per million (ppm) level. Typical background surface methane levels in the UK are below 5 ppm and for the purposes of the type of emission survey at this site, we would only consider readings above 10 ppm to be significant (allowing for measurement uncertainty). The infrared beam is tuned to a methane specific absorption wavelength and is therefore unresponsive to other hydrocarbons. The serial number of the unit is 971221. The unit is calibrated every two years in accordance with the manufacturer's recommendations, the last calibration being undertaken in April 2022.

2.2 Having the data-logger available on this occasion means that we are able to present the data more comprehensively and in a visual format – see figure 1, below. The data logger utilises an app on a mobile phone and records the methane concentration measured by the Geotech TDL 500 every 4 seconds. It also geolocates it using the GPS functionality of the mobile phone. The Geotech TDL 500 and the relevant mobile phone were both carried by the same Environment Agency officer throughout the survey and so the two items were co-located at all times. The wind conditions throughout the survey were N/NNW, as indicated by the windsock on the adjacent Acumen Waste Services Ltd site, at level 5 on the Beaufort Scale – branches of moderate size move. The wind was blustery in nature. According to the BBC Weather App the atmospheric pressure was 1021mb.

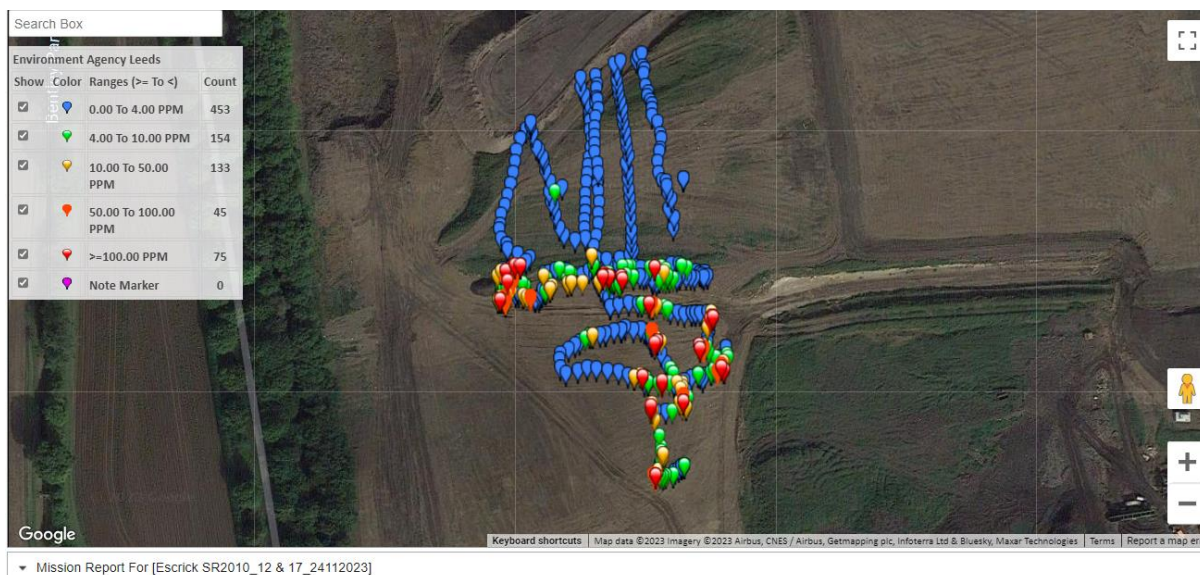


Figure 1 – banded and geolocated Geotech TDL 500 measurements overlaid on an aerial photograph of the site. Note the photograph is taken from the web-based software used in conjunction with the mobile application that logs the data and location. It does not show the state of the site at the time of the survey.

2.3 Figure 1 shows the location of each data-logged reading and the relative methane concentration at each point by reference to colour coded bands, see key within figure 1. The key also records the number of individual readings within each colour coded band. The survey confirms that:

- The materials in the area to the north of the bund of misdescribed 19 12 09 minerals waste (refer to figure 7 in CAR Form 402437/0464481) are not degrading to produce methane.

Officer notes during survey – Northern part of the SR permit area (to the west of the inert landfill. Numerous transects walked, no significant readings including numerous boot scrapes. No odour.

- The misdescribed 19 12 09 minerals waste (refer to figures 7, 8 & 9 in CAR Form 402437/0464481) that was deposited along the flank of waste previously deposited under a Deposit of Recovery permit, in a bund formation running west to east, is now starting to degrade and is producing gas.

Officer notes during survey – north Wales fines bund area, boot scrape at Western end peaks to >1,300ppm. Boot scrape further East peak at > 1,700ppm. Intermittent sulphurous gas odour detected whilst walking along the bund. Intensity ranged from 0 – 3, not present to distinct odour. Saturated section on the flank of the bund seen to be bubbling – strong/obvious sulphurous gas odour present locally, methane peaked at >750ppm.

- The materials in the area on which misdescribed 19 12 12 soil substitute waste had been identified during the 31 May 2023 inspection (refer to figures 2 – 6 in CAR Form 402437/0464481) are now starting to degrade and are producing gas.

Officer notes during survey – Section to the West / rear of Acumen fines footprint area – boot scrape peak at approximately 600ppm. Boot scrape peak at >200ppm. Saturated area bubbling peaked at approximately 2,500ppm. Some obvious patches of grey/yellowish sulphurous surface deposits evident at several places. Strong sulphurous gas odour intermittently detected ranging from 0-4 in intensity – not present to strong odour. Grey/yellowish sulphurous deposit peaked at approximately

1,400ppm. Surface readings peaked at approximately 600ppm. Boot scrape peaked at >400ppm. Gas levels and odour observed appeared to be higher towards the Northern end of this area.

Note – the officer notes above record a series of separate observations in respect of a particular moment during the survey. They are not intended to summaries the survey results in each area. They are useful in comparing the results of this survey with the 23 June 2023 survey, during which data logging was not available. Reference to boot scrapes are when officers disturbed the surface of the waste with their boot prior to measuring the emissions.

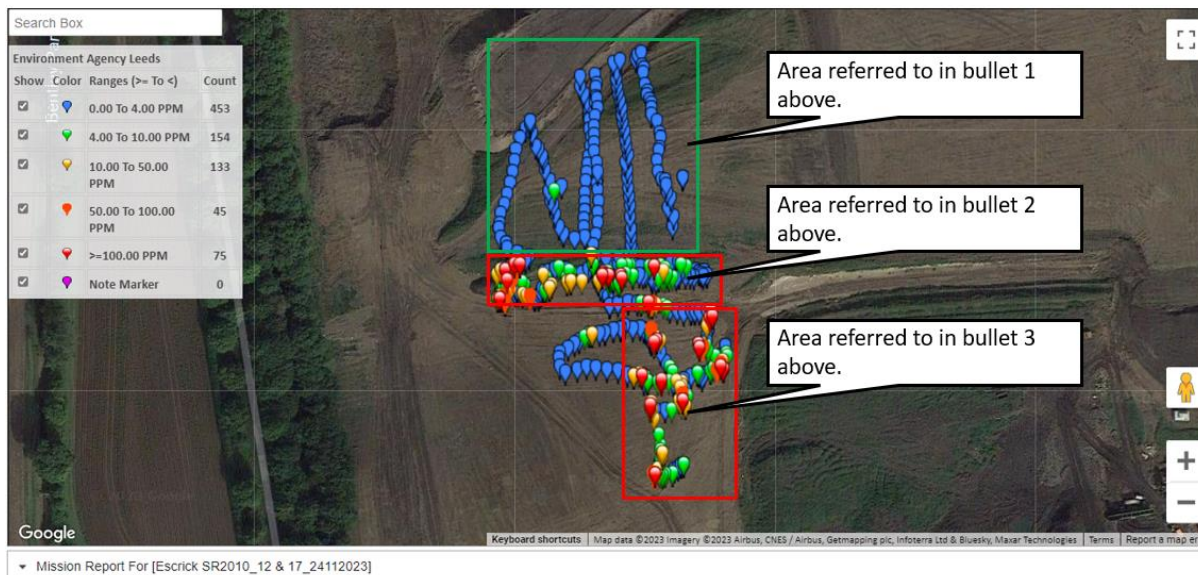


Figure 2 – annotated version of the Geotech TDL 500 measurement overlay shown in figure 1 with approximate locations of the three distinct area reference in the above bullet points identified.

2.4 The same areas were surveyed during a similar survey carried out on 23 June 2023. During the June 2023 survey data logging was not available but none of the areas surveyed showed any significant gas emissions. The results of the June 23 survey are presented in CAR Form 402437/0467146. The June 23 survey findings for these same areas were reported as: *The area to the West and North of the main Acumen pile that is currently covered by Escrick Waste Services Ltd’s standard rules permit, ref 402437. No gas odours were detected. Very occasional and slight waste odour was detected but this was probably drift from the Acumen site. Near surface readings were generally between background, i.e. 1.5ppm and 4ppm, with very occasional peaks between 100-200ppm.*

2.5 The findings of the November 2023 methane emissions survey accord with observations during a small trial pitting exercise that was observed by EA staff during a site meeting with Escrick Environmental Services Ltd and its consultant, Byrne Looby, on 22 September 2023. The meeting was held to discuss options for the removal of the misdescribed waste materials that were identified in CAR Form 104658/0466314. The trial pits were dug to help inform Escrick Environmental Services Ltd’s plan for removing these materials. Three trial pits were dug into the materials to the North of the misdescribed minerals bund (the area described in bullet point 1 in para 2.3) – no obvious odour was detected. Three trial pits were dug into the materials to the West of the Acumen permit area (the area described in bullet point 3 in para 2.3) – intermittent, strong gas odour was noted at this location and, when three trial pits were dug in this area, strong gas odours were noted when the waste was disturbed. At this meeting the materials in this area were described by Escrick Environmental Services Ltd as a mixture of road sweeper wastes and fines that was produced by Acumen Waste Services Ltd and supplied to Escrick Environmental Services Ltd. Escrick Environmental Services Ltd accepts that this material is in its possession and is stored on its site.

When comparing the findings of the June and November 2023 methane emissions surveys, and taking into account the observations during the trial pitting carried on in September, it is clear that

the areas that are subject to misdescribed waste deposits, as identified in CAR Form 402437/0464481, are starting to emit gas and that the gas is odorous.

3.0 Permit Compliance

3.1 Relevant permit breaches in respect of the acceptance of the misdescribed materials that are now emitting gas were recorded on CAR Form 402437/0464481.

3.2 The methane emissions surveys have been carried out as part of the Environment Agency's response to a significant odour incident that happened throughout the summer of 2023. As you know Acumen Waste Services Ltd has removed a significant quantity of biodegradable waste fines from its site and consequently the level of emission (methane and odour) from its activities has reduced significantly. This is reflected in the level of odour reports the Environment Agency is receiving from members of the public, which has reduced significantly from September 2023 onwards. It is considered unlikely that the level of odour observed on site during the November survey has the potential for significant off-site impact, however, there is still potential for some off-site impacts whilst odorous materials remain on site. Our officers' olfactory observations during the November survey suggest that the Escrick Environmental Services Ltd materials, in the areas described in bullet points 2 and 3 above, are now the most significant sources of odour on the wider site.

Whilst these materials remain on site it is unlikely that you will be able to demonstrate that appropriate measures have been taken to prevent or minimise odorous emissions and so, in the event that authorised officers of the Environment Agency detect odour off site, at levels deemed likely to cause pollution, that are attributable to these deposits, you are likely to be in breach of condition 3.2.1 of the permit.

4.0 Summary of Compliance Action Plan Submissions

4.1 Escrick Environmental Services Ltd's plans for addressing the compliance issues identified in CAR Form 402437/0464481 have evolved in response to on-going negotiations with Acumen Waste Services Ltd (in your capacity as its landlord) and as your plans to invest in new plant and equipment develop. The following summarises the correspondence / dialogue to date:

- 1) First iteration of the compliance action plan was submitted in a letter dated 30 June 2023 from your consultant Byrne Looby.
- 2) The EA responded to the 30 June 2023 document in a letter dated 11 July 2023. This letter stated that the response was insufficient and provided details of why it was considered inadequate.
- 3) Escrick Environmental Services Ltd responded in a letter from Byrne Looby dated 19 July 2023. This letter provides additional information on each of the areas identified in our letter of 11 July 2023.
- 4) EA officers met Escrick Environmental Services Ltd and its consultant, Byrne Looby, at site on 22 September 2023, to discuss options to address the compliance issues, principally the options for dealing with the misdescribed 19 12 09 and 19 12 12 materials identified in CAR Form 402437/0464481, which was the main outstanding issue. At this meeting a proposal to install soil washing plant in order to provide treatment options that could produce higher quality materials for use in the restoration of the site was discussed. This would represent a significant investment. It would also provide the option of treating the misdescribed materials identified in CAR Form 402437/0464481. The proposal discussed involved the development of the part of the site that is currently covered by Acumen Waste Services Ltd's permit (permit EPR/KB3739AJ [EAWML104658]), would take place under the provision of permit EPR/KB3739AJ [EAWML104658] and would be reliant on transfer of that permit from Acumen Waste Services Ltd to Escrick Environmental Services Ltd. It would also be influenced by on-going negotiation between both parties around their landlord / tenant relationship. During this meeting (and subsequently involving

Acument Waste Services Ltd) the Environment Agency has provided advice to both parties about how Escrick Environmental Services Ltd may be able to operate under permit EPR/KB3739AJ [EAWML104658] prior to the determination of a permit transfer application. It is the Environment Agency's understanding that the two parties intend to enter into a contractual agreement that would amount to Escrick Environmental Services Ltd operating under the control of Acumen Waste Services Ltd, such that the latter remains as the Operator. During this meeting Environment Agency officers also observed a trial pitting exercise – see para 2.5, above.

5) The Environment Agency responded to Escrick Environmental Services Ltd's 19 July 2023 letter dated 6 October 2023. This letter confirmed how we had considered Escrick Environmental Services Ltd's request to review the scoring of the breaches recorded on CAR Form 402437/0464481. The breach of condition 2.1.1 was reduced from a category 2 breach to a category 3 breach and all other breaches remained as originally scored. An amended version of CAR Form 402437/0464481 was issued.

6) Another iteration of the Compliance Action Plan was submitted on 24 October 2023. This comprised a document entitled, *Revised action plan following a site meeting on 22 September 2023 and with respect to guidance provided on 06 October 2023*, the document was dated 24.10.204 and an addendum to the EMS, ref: K5259-BLP-R-ENV-00020, dated 23 October 2023. The compliance action plan comprises 6 bullet points, summarised as:

a) WRAP Protocol Material – states that additional sampling will be carried out by end November and testing completed by mid December.

Note – this should now be complete. When reporting the results please make sure that it is clear where samples were taken and how you have determined that they are representative of the 80k tonnes of material you are claiming was produced in line with the WRAP protocol.

b) Clay Pad Testing – stated that core samples will be obtained and tested as and when the pad is accessible following removal of in situ waste, which in turn is subject to agreement of a new restoration specification (re the restoration of the inert landfill) with the Yorkshire Landfill Team.

c) Removal of the fines back to Acumen – states this will be done asap subject to weather and agreement of the waste removal plan set out at item 4.

d) Waste Removal Plan – this essentially states that this part of the plan will be provided in 3 weeks. **To date this has not been received.**
Note – items c and d do not seem to address the misdescribed 19 12 09 minerals waste, that we understand came from a site in North Wales, please confirm whether it is the intention to remove this material “back to Acumen” as well. It is also not clear whether this part of the plan has subsequently been affected by on-going negotiations with Acumen Waste Services Ltd in respect of permit transfer / the landlord / tenant relationship.

e) EMS Review – states this part of the plan is complete and refers to K5259-BLP-R-ENV-00020, dated 23 October 2023.

f) Waste Sampling Plan – confirms a sampling plan will be updated to ensure compliance with requirements of WM3 and states that clarity will be provided as to how representative sampling and analysis will be carried out as the stockpiles are processed. It states this will be available with 4 weeks. **To date this has not been received.**

7) On 11 December 2023 submissions described as surface emission gas action plan and surface emissions data was received by the Environment Agency. This summarises findings of a surface emissions survey carried out by Escrick Environmental Services Ltd (via its consultant – Ayesa, formerly Byrne Looby) on 27 November 2023. The findings of this survey appear to be similar to the findings of the survey that the Environment Agency carried out on 24 November 2023 that is reported above. The proposed odour mitigation can be summarised as follow:

- Increased odour monitoring on and off site – method and frequency is not specified.
- Remove the misdescribed odorous wastes for treatment in the soil wash plant (currently not built) on the adjacent Acumen Waste Services Ltd site, under the provision of the extant permit - EPR/KB3739AJ [EAWML104658].
- In the event of off-site odour impact, prior to installation of the proposed new wash plant, i.e. whilst the materials remain undisturbed in situ, a layer of inert soils will be placed on targeted areas.
- Once the wash plant is operational and working to removed the misdescribed odorous materials starts (with inherent increase risk of off site odour impact), the following additional odour mitigation is proposed:
 - Any soil cover that has been placed will be removed sensitively with due consideration to windspeed and direction at the time.
 - Odorous material will be excavated and transported to the wash plant, where it will be processed immediately.
 - Any unsuitable by-product materials that are produced will be removed from site immediately.
 - At the end of each working day, or as and when required, the fines stockpile located on the EES site under permit EPR/DB3000UP will be covered again using the same or a fresh new inert soils cover.

5.0 Review of the Current Situation

5.1 The compliance actions plans submitted to date are disjointed and in several key areas are incomplete or lacking in sufficient detail. It is not clear how the later versions of the compliance action plan relate to each other or how they are impacted by subsequent discussions / agreements between Escrick Environmental Services Ltd and Acumen Waste Services Ltd.

5.2 The imperative to address the compliance issues promptly has increased as a result of the fact that the misdescribed wastes identified in CAR Form 402437/0464481 have started to degrade, producing odorous gas.

5.3 The information provided in relation to the removal of the misdescribed odorous waste is lacking the following key details:

- Timeframe for installation of the proposed new wash plant.
- Specification of the proposed new wash plant.
- Confirmation of the agreements between Escrick Environmental Services Ltd and Acumen Waste Services Ltd that would allow Escrick Environmental Services Ltd to operate under the direction of Acumen Waste Services Ltd during any permit transfer determination period.
- Confirmation that an application to transfer the permit has been made or a deadline by when the application will be submitted.
- Details of the outputs from the wash plant activity and how waste input control will be managed in respect of the proposed outputs (e.g. WRAP protocol compliant outputs or not) and taking into account the proposed downstream use(s)/disposal options for the material.
- Details of the sampling and analysis plan that will be used to test the outputs to ensure they are properly characterised and meet the required specification for their proposed use or legislative requirements associated with their disposal (e.g. materials that are disposed of in the landfill will need to be shown to be non-hazardous and

meet inert landfill WAC). The sampling plan needs to consider outputs from the wash plant activity and any additional sampling that is required in respect of materials that are stored on site and will be used/disposed of on site without further treatment – e.g. the materials stored on the pad.

- The plan needs to consider how the odour potential of the wash plant fractions will be assessed and, if necessary, mitigated, including that of the filtercake and liquid effluent waste streams.
- It is not clear whether the proposal to move material across to the Acumen Waste Services Ltd site for treatment in the proposed new wash plant applies to both the misdescribed 19 12 12 soil substitute materials (produced by Acumen) and the misdescribed 19 12 09 minerals waste or not. Please clarify.

5.4 In addition to the points raised at 5.3 above it is also noted that:

- The additional sampling of the WRAP Quality Protocol material mention in your 24 October 2023 letter has not been reported yet. Please provide this along with a full explanation of how it help to demonstrate compliance with the protocol.
- Testing of the clay pad to demonstrate compliance with the CIRIA 736, as proposed in your 24 October 2023 letter is yet to be completed. This will need to be completed as soon as the overlying materials are moved, as yet the timeframe for this is uncertain.

5.5 Escrick Environmental Services Ltd have determined that the wash plant that they are buying will be able to operate under the current provisions of permit EPR/KB3739AJ [EAWML104658] without the need to vary the permit. At face value there is no reason to believe that this isn't the case, given the information available to the Environment Agency at this time. However, you are advised to consider the requirements of condition 1.1.1 of the permit in respect of the potential environmental impact operating the new plant might have. You should ensure that you thoroughly consider all potential environmental impacts that might arise and ensure that your management system provides adequate mitigation. In particular, I would advise you to carry out thorough risk assessments in respect of the potential amenity impacts that could arise. In addition to the potential odour impact that is covered in detail above, I would advise that you also consider the potential for noise and dust emissions from the new plant.

Action – provide a single consolidated version of your compliance action plan that represent a full standalone version of your plan and that supersedes all previous versions and reflects the current arrangements/agreements between Escrick Environmental Services Ltd and Acumen Waste Services Ltd. The additional information set out in section 5.3 above must be included in the plan.

Deadline: 31 December 2023

Section 3- Enforcement Response

Only one of the boxes below should be ticked

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.

**Non-compliance with MSA, MSB & TCM do not constitute an offence but can result in the service of a compliance, suspension and/or revocation notice.*

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.	
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.	

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

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

Criteria Ref.	CCS Category	Action Required / Advised	Due Date
See Section 1 above			

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 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.
- A civil sanction Enforcement Undertaking (EU) offer may also be available to you as an alternative enforcement response for this/these offence(s).

See our Enforcement and Civil Sanctions guidance for further information

**A breach of permit condition MSA, MSB & TCM is not an offence but may result in the service of a notice requiring compliance and/or suspension or revocation of the permit.*

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 which 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.

MSA, MSB & TCM are conditions inserted into certain permits by Schedule 9 Part 3 EPR

MSA requires operators to manage and operate in accordance with a written management system that identifies and minimises risks of pollution.

MSB requires that the management system must be reviewed, kept up-to-date and a written record kept of this.

TCM requires the submission of technical competence information.

Section 6 – General Information

Data protection notice

The information on this form will be processed by the Environment Agency to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). The Environment Agency 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

The Environment Agency 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 Environment Agency 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 28 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?

A permit holder can challenge any part of the CAR form by writing to the Environment Agency office local to the site within 28 days of receipt. If the issue cannot be resolved by the local office, a permit holder can raise a dispute through our official [complaints procedure](#).

If you are still dissatisfied, you can make a complaint to the Ombudsman. For advice on how to complain to the [Parliamentary and Health Service Ombudsman](#), phone their helpline on 0345 015 4033.