

IED Implementation



**Joint inspection
AG BARR PLC
Cumbernauld**

**Inspection conducted by
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Gilroy of SEPA**



European Union Network for
the Implementation and Enforcement
of Environmental Law

IMPEL team



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of Environmental Law

2018-01

mutual joint visit

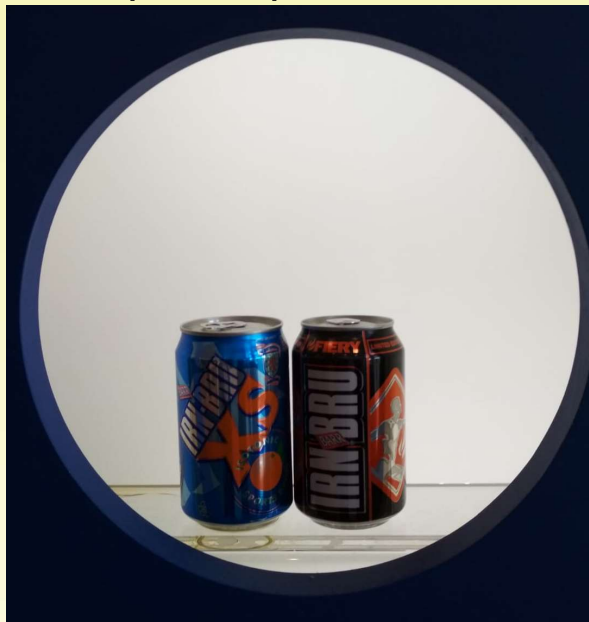
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Description of the installation

Soft drink manufacturer-more than 300 Mg/day
IED annex 1.6.4.

Main product – IRN-BRU

Rated as excellent by SEPA on the compliance
assessment scheme (CAS) for 2018



2018-01



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SEPA's Compliance Assessment Scheme

Figure 1 Compliance matrix

		Environmental Limit Conditions (ELCs)		
		No breaches	Minor breach(es)/ one gross breach	Significant breach, more than one gross breach or repeated minor breach
Environmental Management Conditions (EMCs)	High performance	Excellent	Good	Poor
	Medium performance	Good	Broadly compliant	Poor
	Low performance	At risk	Poor	Very poor



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Scope of the inspection

Standard inspection

Three sections of the permit were checked

- resources utilisation
- waste management
- drainage and bunding



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On site visit

Discussion of the permit and reports required

Tour of the facility:

- Labelling and packaging
- Filling
- Cleaning and mixing
- Boiler house
- Tanks, silos, bunding and drains
- Waste storage



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Outcome

No offensive odour on site

Bunding was ok

Waste separation and storage was ok

Reports not submitted on time - have to be sent asap

Specific template for resource utilisation report

Procedure for filling silos

Advise regarding BREF and MCPD

Minor EMC non-compliance may be recorded for late submission of reports however this will not change excellent rating



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Lessons learned

Permit is comprehensive and detailed – that makes inspection simple (detailed process description is in Decision Document not Permit)

Eg. condition 2.1.1 and 2.1.2. requires the operator to have an appropriate person as the primary point of contact with SEPA and shall notify SEPA in writing if this is changed

SEPA requires information on raw materials (desirable) to make balance between input and output, and to compare different sites in the sector



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Lessons learned

Efficient reporting and communication with facility along with reporting to the public (CAS) EMCs allow SEPA to give the operator time to correct problems (E.g. Late reports). However if the corrective actions are not completed SEPA will then implement their Enforcement Scheme e.g. Warning letters or report to Procurator Fiscal.

An important consideration is that in SEPA the inspecting officer controls the Inspection, Permit and Compliance Assessment Report



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