

The county governor of Oslo and Viken

Place: Oslo Date: October 24, 2019

Our ref. (Please state by answer): 2019/50837 Their ref. : Roger Fredriksen

FREDRIKSTAD SEAFOODS AS c / o Øra Industripark AS, Øraveien 2 1630 Gamle Fredrikstad

Case manager: Anette Strømme

Inspection report Inspection at Fredrikstad Seafoods AS - Land-based salmon farming Control number: 2019.045.I.FMOV

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Contact persons at the inspection: From the company: Roger Fredriksen

From the County Governor of Oslo and Viken: Anette Strømme

Other participants from the company: Simen Haaland

Other participants from the County Governor of Oslo and Viken: Marte Rosnes

Results from the inspection This report deals with the result from the inspection at Fredrikstad Seafoods AS - Land-based salmon farming (Fredrikstad Seafoods AS) on 16.10.2019. The report is considered final if we do not receive feedback on actual errors within two weeks of receiving the report.

The county governor of Oslo and Viken revealed 6 non-conformities and gave 2 remarks during the inspection.

Deviation:

Fredrikstad Seafoods AS lacks emission control

Fredrikstad Seafoods AS lacks monitoring of recipient

Fredrikstad Seafoods AS lacks action plan for risk-reducing measures

Fredrikstad Seafoods AS must risk assess all conditions at its lye tank

Fredrikstad Seafoods AS lacks routine for waste declaration

Fredrikstad Seafoods AS lacks energy management system

Remarks:

Fredrikstad Seafoods AS's deviation system can be improved

Fredrikstad Seafoods AS's notification routines can be improved

#### 1. Information about the controlled business

Responsible unit Name: FREDRIKSTAD SEAFOODS AS

Organization no. : 913245873

Owned by: 913235967

Industry no. (NACE code): 03.211 - Production of food fish, molluscs, crustaceans and echinoderms in marine and coastal aquaculture

Controlled unit Name: Fredrikstad Seafoods AS - Land-based salmon farming Municipality:

Fredrikstad Construction activity: Salmon fish production on land Permit granted: 30.10.2015

Construction no. : 0106.0174.04 County: Østfold

Last changed:

2. Background for the inspection The inspection was carried out to check whether the applicable requirements laid down in or pursuant to the Pollution Control Act are complied with. The inspection is part of the County Governor's risk-based industrial inspection for this year. The audit was carried out in accordance with the Pollution Control Act § 48.

Inspection topic • Permit dated 30.10.2015

(permit no: 2015.0720.T)

Internal control Process and cleaning equipment

• •

Emissions to water Emissions to air Waste Chemicals

The report deals with deviations and remarks that were discovered during the inspection and does not provide a complete condition assessment of the company's environmental work or environmental status.

Definitions Deviations: Failure to comply with requirements laid down in or pursuant to law.

Note: A factor that the supervisory authorities believe is necessary to point out in order to safeguard the external environment, but which is not covered by the definition of non-conformance. Other matters: Cases that emerged during the inspection and that it may be useful for the company and caseworkers to know. This may also include comments on topics that were raised during the inspection, but where no deviations or remarks were made.

Follow-up after the inspection Fredrikstad Seafoods AS is obliged to rectify the deviations described in this report as soon as possible. In order for the County Governor to be able to close the case, Fredrikstad Seafoods AS must send a written statement by 31 January 2020 showing how deviations have been corrected.

We ask that you send the reply letter or e-mail (fmovpost@fylkesmannen.no) to the County Governor of Oslo and Viken by Anette Strømme.

4. Decision on fees We refer to notice and information about the fee obligation that was given to the company on 20 September 2019. Companies must pay a fee for inspections carried out by the County Governor in accordance with § 39-3 of the Pollution Control Regulations. The fee shall cover costs of preparation, implementation and follow-up of the inspection. Fee rates for control of businesses according to the Pollution Control Act are stipulated in the Pollution Control Regulations §§ 39-7 and 39-8.

On the basis of used and expected use of resources, Fredrikstad Seafoods AS will be charged a fee of NOK 26,300 for the inspection, cf. the pollution regulations §§ 39-7 and 39-8. This corresponds to fee rate 2 for inspections of up to one day's duration. The company will receive an invoice from the Norwegian Environment Agency for payment to the Treasury. We also refer to Chapter 39 of the Pollution Control Regulations for further information on the collection of fees to the Treasury.

Right of appeal The decision on a fee may be appealed to the Norwegian Environment Agency, cf. section 28 of the Public Administration Act. Any complaint should be justified in writing and addressed to the Norwegian Environment Agency, but sent via the County Governor of Oslo and Viken. The county governor will consider changing the decision or forward the case to the Norwegian Environment Agency for a final decision. Any complaint will not have a suspensive effect, and the fee stipulated above must be paid. If the Norwegian Environment Agency accepts the complaint, the overpaid amount will be refunded.

5. Access This report will be available to the public via the postal journal of the County Governor of Oslo and Viken (cf. the Public Administration Act).

6. Deviations We found the following deviations during the inspection:

Deviation 1 Fredrikstad Seafoods AS lacks emission control  
Deviation from:

The permit pursuant to the Pollution Control Act for the operation of a land-based aquaculture facility dated 30.10.2015 (the permit), item 11 Emission control and reporting to the pollution authority.

Comments: The permit required Fredrikstad Seafoods AS to have discharge control. The company will carry out measurements of emissions to air and water. Measurements include volume flow measurement, sampling, analysis and calculation. The measurement program must be included in the company's documented internal control.

Measurements shall be performed so that they are representative of the company's actual emissions and shall as a minimum include:

Components that are explicitly regulated through limit values in

the permit or regulations. Other components that are covered by the reporting obligation in accordance with the Norwegian Environment Agency's guide to the companies' own control reporting

Fredrikstad Seafoods AS 'measurement program for its emissions is deficient. The results from measurements of effluent are not calculated and the company lacks an overview of its discharge to the municipal wastewater network.

Fredrikstad Seafoods AS does not take measurements of sludge that they release on the municipal wastewater network. Fredrikstad Seafoods AS has a discharge agreement with Fredrikstad municipality and the sludge goes to the Frevar sewage treatment plant on Øra. As the company does not take samples of the sludge, they thus also do not know whether they are complying with the discharge agreement with Fredrikstad municipality.

Deviation 2 Fredrikstad Seafoods AS lacks monitoring of the recipient

Deviation from: Permit point 12 Monitoring of recipient with reporting to the pollution authority.

Comments: The permit requires Fredrikstad Seafoods AS to carry out regular inspections and monitoring of Glomma. The monitoring can be carried out in-house or in collaboration with others who carry out monitoring in the same area.

The company does not have a routine / plan for monitoring according to the water regulations in Glomma and has not taken samples in the recipient.

The results of the monitoring shall be entered in the Aquatic Environment Database. All sampling results in the recipient must be entered in the subject database Water Environment to contribute to increased information about the environmental condition of the recipient. A good knowledge base is important for further work with water management and follow-up of the water regulations.

The county governor can, if necessary, contribute to creating new localities in the Aquatic Environment for the relevant test points. The laboratory used can enter the analysis results directly into the form which is then imported into the Aquatic Environment. The import form to be used for entering data can be downloaded from Vannmiljø.

Deviation 3 Fredrikstad Seafoods AS lacks an action plan for risk-reducing measures

Deviations from: The permit section 10.2 Preventive measures. Regulations on systematic health, environmental and safety work in enterprises (Internal Control Regulations) § 5 items 6 and 8.

Comments: The permit and the internal control regulations require that an environmental risk assessment be prepared to identify hazards and problems and on this basis assess risk. On the basis of the environmental risk analysis, an action plan shall be prepared with measures that reduce the risk conditions with set deadlines for implementation, as well as who is responsible for implementing risk-reducing measures. This shall be part of the company's internal control and shall be audited regularly to ensure that the internal control, including environmental risk assessment and action plan, functions as intended.

Fredrikstad Seafoods AS has prepared an environmental risk assessment and has several risk-reducing measures, but lacks an overall action plan.

Deviation 4 Fredrikstad Seafoods AS must risk assess all conditions at its lye tank

Deviations from: Pollution Control Regulations (Pollution Regulations) Chapter 18 Tank Storage of Hazardous Chemicals and Hazardous Waste (Tank Storage Regulations) § 18-4 Environmental Risk

Comments: The tank storage regulations require that the environmental risk analysis must include all conditions during tank storage, including the tank, barrier, connected pipes and equipment and more. The environmental risk assessment shall also include an assessment of the vulnerability of the environment that may be affected by pollution from tank storage. Fredrikstad Seafoods AS has a 15 m<sup>3</sup> tank with lye. The company has a risk assessment for filling lye, but lacks a risk assessment of all other conditions during tank storage

Deviation 5 Fredrikstad Seafoods AS lacks a routine for waste declaration

Deviation from: Permit point 9 Waste and sludge. Regulations on recycling and treatment of waste (Waste Regulations) Chapter 11 Hazardous waste, § 11-8 Obligation to deliver and § 11-12 The companies' declaration obligation on the content of the waste.

Internal Control Regulations § 5 2nd paragraph item 7.

Comments: From Fredrikstad Seafoods AS's facility, hazardous waste is generated, such as waste oil, oil-contaminated material and chemicals. Hazardous waste was stored in marked containers in a closed container. The company's routine for hazardous waste has not been updated with regard to storage, electronic declaration and delivery of hazardous waste.

The hazardous waste must be delivered to legal reception at least once a year and declared in avfallseklarer.no upon delivery. The obligation arises when the total amount exceeds 1 kg.

Deviation 6 Fredrikstad Seafoods AS lacks an energy management system

Deviation from: The permit section 8.1 Energy management system

Comments: The permit requires the company to have a system for continuous assessment of measures that can be implemented to achieve the most energy-efficient production in the facilities. The energy management system must be in writing and included in the company's internal control.

During the audit, the company could not document that they have an energy management system.

7. Remarks The following conditions were noted during the inspection:

Note 1 Fredrikstad Seafoods AS's deviation system can be improved

Comments: Fredrikstad Seafoods AS has a deviation system. Definition of what a deviation is, as well as a written routine for handling deviations can be improved. **Incidents such as neighbor complaints about noise are not captured in the current non-conformance handling.**

Follow-up of nonconformities can be improved by setting up those responsible for closing each nonconformity.

Note 2 Fredrikstad Seafoods AS's notification routines can be improved

Comments: Fredrikstad Seafoods AS has not included notification of Fredrikstad municipality in the event of extraordinary discharges to the municipal wastewater network that goes to the Frevar wastewater treatment plant on Øra.

8. Other matters Fredrikstad Seafood AS started production in May 2019. Production was in the start-up phase with 90 tonnes of total biomass under supervision. The plant is designed for 2400 tonnes of biomass per year, divided into two modules.

A possible expansion of the plant is planned with increased biomass and its own slaughterhouse. An updated application with actual conditions must be sent to the County Governor of Oslo and Viken before the plant expands or at the start of the slaughterhouse / smolt plant.

9. Documentary basis The legal basis for the inspection was:

. Act on protection against pollution and on waste (the Pollution Control Act) with

underlying regulations

Regulations on the limitation of pollution (the Pollution Control Regulations) • Regulations on the recycling and treatment of waste (the Waste Regulations) • Regulations on systematic health, safety and environmental work in enterprises

(Internal Control Regulations) Permit for activities pursuant to the Pollution Control Act from the County Governor dated 30.10.2015 (permit no: 2015.0720.T)

10. Information to the company Regulations about which it was informed:

• Act on protection against pollution and on waste (the Pollution Control Act) • Regulations on the limitation of pollution (the Pollution Control Regulations) • Regulations on the recycling and treatment of waste (the Waste Regulations) • Regulations on systematic health, safety and environmental work in enterprises

(internal control regulations)

Brochures / info sheets distributed:

• Fee at inspection (M-297)