

Compliance Assessment Report CAR_NRW0046431

Permit being assessed: AB3591ZQ.

For: Maelor Foods Limited, **held by:** Maelor Foods Limited

At: Maelor Foods Limited, Pickhill Lane, Cross Lanes, Wrexham, Wrexham, LL13 0UE.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: Q4 & Annual Returns.

NRW Lead Officer: Kathryn Bradshaw.

Report sent to: General Manager, General Manager, on 24/02/2025.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR4B - Installations - Information - Reporting	C4 No impact	4.2.3
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
2	4.1

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
IR3A(1)	Actions already completed include wider range internal test kit for ammonia, Add ETP and Environmental Team to ALS lab notifications, limits have been set on ALS lab portal so if breached immediate nonconformance report will be sent to ETP and Environmental Officer	10/02/2025
IR4B	Implement procedures to ensure all permit reporting requirements are submitted by the dates detailed in the	31/03/2025

Criteria	Action needed	Complete by
	permit	

Compliance criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

This Compliance Assessment Report (CAR) has been raised in relation to the Q4 2024 monitoring returns and annual reports.

Q4 Monitoring Returns

Q4 monitoring returns were submitted on 18th February 2025 for emission point W1. This was not in compliance with permit condition 4.2.3 as the results must be submitted within 28 days of the end of the reporting period.

It was discovered by the site on 10th February 2025 that the limit for ammonia (5mg/l) detailed in Schedule 3 Table S3.2a was breached on the following dates;

04/10/25 – 21.4mg/l

10/10/25 – 15.1 mg/l

22/10/25 – 10.4 mg/l

27/11/25 – 18.1 mg/l

05/12/25 – 6.69 mg/l

A schedule 5 notification was received on 18th February for these breaches following the discovery by site that the limits had been breached. The details submitted on the Schedule 5 by the site is summarised as follows:

On 10/02/25 it was identified that in October 2024, the effluent treatment plant (ETP) experienced toxicity issues, which were confirmed by our external consultant following a review of the plants biological performance. This toxicity severely impacted nitrification, as microbial life forms were unable to complete the nitrification cycle. The toxicity is believed

to have been caused by the increased use of hygiene chemicals.

During this period, in-house results were recorded at 2.54 mg/l – 2.74 mg/l due to the limitations of our equipment, which is unable to measure above 5mg/l without dilution.

The UKAS accredited lab results provided during this time were emailed directly to the site's technical team and not to the ETP or Environmental Department, the breach went unnoticed until later. It is also found that there are no limits for testing parameters set to ALS lab results, resulting in no notification of non-conformance reports from the lab itself.

Actions that have already been taken to stop the emission:

- Plant biology was re-seeded on 29th November 2024 to improve nitrification and address the toxicity issues.
- HACH DR3900 kit was introduced to the in-house lab to improve detection capabilities for a wider range of parameters including toxicity, chloride levels, nitrite, nitrate, total nitrogen and ammonia (up to 150 mg/l), ensuring more accurate readings and better monitoring going forward.
- The Environmental Team and ETP Team will be added to the ALS lab result portal to ensure immediate detection of any future breaches.
- ALS contacted to set limits on parameters and once breached an immediate email alert to be sent to the Environment Officer.

Score (IR3A) Emissions to water. Permit Condition 3.1.2. C3

The ammonia emissions did not come back into compliance until 13/12/25 but there was a significant reduction in ammonia one week following the reseeded of biology within the plant. On 05/12/24 the result for ammonia was 6.69 mg/l.

All other emission limit values (ELV's) were in compliance with the limits set in Schedule 3, Table S3.2a.

Annual Reports

The annual performance reports were submitted on 18th February. Permit condition 4.2.2 require these to be submitted by 31st January for the previous year.

Score (IR4B) Reporting. Permit Condition 4.2.2. C4

Action

Implement procedures to ensure all permit reporting requirements are submitted by the dates detailed in the permit.

Energy and water usage per bird has increased from 2023 and 1 million birds were slaughtered in weeks 37, 43 and 46 which is the maximum permitted limit. The number of chicken products produced per week has increased significantly from 2023.

Investigations into the ammonia breach will continue and further permit breaches may be identified.

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If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or

suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.