

## Compliance Assessment Report CAR\_NRW0046567

**Permit being assessed:** YP3632EM.

**For:** Sandycroft Poultry Processing, **held by:** 2 Sisters Food Group Limited

**At:** VION Sandycroft Glendale Avenue , Sandycroft, DEESIDE, Clwyd, CH5 2QP.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 10/03/2025 between 11:30 and 12:30.

**Parts of permit assessed:** various.

**NRW Lead Officer:** Rebecca Harwood, accompanied by Kathryn Bradshaw.

**Report sent to:** Site Director, Site Director, on 17/03/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2C - Installations - Operations - Operating techniques	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Action only (X)	
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR3D - Installations - Emissions and monitoring - Noise and vibration	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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)	see text below	31/03/2025
IR3D	see text below	30/04/2025

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.

**At this time, we do not intend to take any further action.**

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) follows an inspection of the 2 Sisters site in Sandycroft on the 13<sup>th</sup> March 2025 between 11:30 and 12:30. Officers met with the Environment Manager and Engineering Manager.

#### ***Odour***

Following a report of odour from Flintshire County Council at the end of February that correlated with the timing of the sludge tank being emptied, NRW Officers visited site to assess odour from the effluent treatment plant (ETP). Sludge from the ETP is contained within a 38,000l tank. The sludge tanker was on site between 07:10 and 07:50 the morning of the inspection emptying the tank. The Operator subsequently confirmed that the sludge is taken off site to biogas plants in England.

New transfer pumps were being installed to the ETP during the visit. Dolavs below the screening tank are taken off site as CAT2 waste. The Operator confirmed that they are continuing to dose the effluent with DIOX prior to discharge, dosing was occurring at the time of the visit.

At the time of the visit Officers did not note any issues with the operation of the ETP or the discharge. Dŵr Cymru Welsh Water (DCWW) are responsible for the Operator's trade effluent discharge and Officers continue to liaise with DCWW as necessary. The Operator stated that recent results in relation to the trade effluent discharge consent were compliant, although Officers did not review the results during the visit.

**Action 1:** Provide NRW with DCWW sample analysis from October 2024 - present. This should be submitted by 31/03/2025.

Action 2 in CAR NRW0045379 required the Operator to install an external door into the Effluent Treatment Plant building to further reduce odour from the site. This has been completed and a new roller shutter door has been installed.

The offal trailer area was free from debris at the time of the visit. The Operator confirmed that regular checks of this area continue to be undertaken. There were no trailers waiting to be removed at the time.

The blood tank was being emptied during the visit. A strong odour from this activity was noted adjacent to the tank where the pipes were attached to the tanker. This odour although strong was localised.

The roller shutter door to the carcass shed was open during the visit. Odour from this area could be detected on the bund adjacent to Chester Road. The door was open as there was a delivery of CO<sub>2</sub> to the storage tanks, therefore the side door was out of use. A tractor unit had also arrived to remove the trailer off site. The Operator was reminded to keep the door closed to minimise any offsite odour impacts.

Off site odour checks were undertaken prior to the visit, between 10:15 and 11:30. Although the lairage could be smelt within the car park, there was no off site odour associated with the site detected within the residential areas.

### **Noise**

There have been 6 noise complaints made to NRW since the last inspection in November. The Operator has submitted their Noise Impact Assessment, comments relating to this are within CAR NRW0046489.

As a result of this assessment the Operator has enclosed the glycol chiller. The chiller is not fully enclosed. Double skinned aluminium sheet with sound deadening material sandwiched between has been installed on the sides facing Church View and Chester Road. The roof is double sheeted. Based on comments from reporters ,this enclosure appears to have altered the sound characteristics from the chiller unit.

**Action 2:** The Operator should review the glycol chiller enclosure to assess whether further improvements could be made to reduce the off site noise impact of the chiller unit. An update should be provided to NRW by 31/03/2025.

The Operator stated that the glycol chiller would be removed when the new chiller plant is in place. Officers reminded the Operator that a permit variation was required for the operation of the proposed chiller plant.

The Noise Impact Assessment also recommended an acoustic fence along the top of the bund adjacent to Church View. The Operator is actively looking into this and stated that it would be 2.4m high and 45m in length. This would be located, approximately, from the steps adjacent to the despatch bay to half way along Gladstone Terrace.

A noise complaint had been received from Chester Road. Officers reviewed the locations of trailers between the gatehouse and chill buildings, adjacent to the overspill car park. A trailer was running on engine at the time and switched off whilst Officers were standing on the bund by the car park. There was a notable reduction in noise when it switched off. NRW acknowledge that these trailers were moved from the despatch bay to avoid disrupting residents at that end of the site. The Operator confirmed that they monitor the trailers and any noisy trailers are removed from site.

**Action 3:** The Operator should investigate the possibility of changing all trailers to electric to reduce off site noise impacts. If this is not possible, investigate alternative noise abatement procedures and/or infrastructure. An update / proposal should be submitted to NRW by 30/04/2025.

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](mailto: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](mailto: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.