

Compliance Assessment Report CAR_NRW0048130

Permit being assessed: YP3732LZ.

For: WREXHAM CABLE WORKS, **held by:** Prysmian Cables and Systems Ltd

At: Oak Road Oak Road , Wrexham Industrial Estate, WREXHAM, Clwyd, LL13 9PH.

Type of assessment: Site Inspection,

Reason: Routine.

On: 08/04/2025 between 10:00 and 14:00.

Parts of permit assessed: See Section 4 (below).

NRW Lead Officer: Victoria Taylor.

Report sent to: Site Director, Site Director, on 02/05/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	C3 Minor	Condition 1.1

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

Total non-compliances recorded	Total non-compliance score
1	4

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
IR1A	See Actions 1 & 2 below	04/08/2025

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.

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

The NRW regulating officer undertook a pre-arranged site inspection on the 8 April 2025 and met with the Site Director and the Prysmian UK Health & Safety and Environment Manager.

The purpose of the site inspection was to review the data provided to support non-compliance actions raised during the previous Operator Monitoring Assessment (OMA), undertaken on the 19 June 2024 (CAR reference NRW0044620).

Status of Actions from OMA

The status of the actions raised during the OMA, prior to the site inspection, are summarised below.

- **Action 1.** Provide NRW with an internal auditing programme which identifies and utilises departments /personnel who are not directly associated with the monitoring activities to undertake the audits.

Evidence of an internal auditing programme was provided by the Operator on 11 September 2024. **Completed.**

- **Action 2.** Prepare a sampling schedule.

A sampling schedule was provided by the Operator on 11 September 2024.
Completed

- **Action 3.** Investigate and address how personnel are appointed and inducted to specific roles, with particular emphasis on a robust technical handover and senior management support. Provide NRW with evidence of sufficient competent persons in roles or provide a proposal and timeline.

No update provided.

- **Action 4.** Provide NRW with a copy of the new personnel contingency procedure

The Operator provided a copy of the Operational Control Chart on 11 September 2024. This includes a functional manager for each environmental aspect, a nominated deputy and signposting to the relevant procedure or work instruction.
Complete

- **Action 5.** Include a review of the results in each Annual Report as required by the Permit. Include a review of the results to date and cross reference any sampling data with the historical and recent operation of the lead coating process.

Review of results received as part of Q4 Annual Returns (2024). **Complete**

- **Action 6.** Review and update the preventative maintenance plan to include management and maintenance of drains and interceptors at appropriate intervals. Provide NRW with a copy of the updated PMP

Evidence of a preventative maintenance plan was provided by the Operator on 11 September 2024. **Complete**

- **Action 7.** Review, update and provide training to staff on reporting of incidents and accidents. Allocate staff and resource for undertaking regular planned site "walk arounds" which will identify potential environmental issues.

Evidence provided by operator details how near misses and incidents /accidents are reported on 11 September 2024. **Complete**

- **Action 8.** Summarise the specification /details of existing operational, duty and standby, boilers. Information to include size in megawatts (MW), the date of installation and commissioning and fuel type for each boiler.

Screenshot of boiler plate and copy of boiler management procedure was provided by the Operator on 11 September 2024. **Complete**

Findings of Site Inspection

The site inspection focused principally on a meeting to review the evidence provided by the Operator in response the non-conformances and associated actions. This was followed by a brief external tour of the diesel storage and garage area.

Generally there had been improvements at the facility and the Operator was able to evidence and detail many of the procedures and processes which were lacking during the previous visit. The Operator also highlighted areas where improvement is ongoing.

Measures being implemented to improve appropriate resource availability and engagement at the facility were outlined. The role of SHE Manager has been vacant since July 2024, however a formal appointment as been made with a start date anticipated by early July 2025. Proposals are in place to provide the necessary training and support to the new appointee. The historical "*Environmental Handover – HOW TO Crib Notes*" is being reviewed and updated accordingly.

The Operator highlighted the intention to update the Operational Control Chart (Action 4 above) to reflect changes in roles and responsibilities pending the appointment of the new SHE Manager. This will be reviewed at the next site inspection.

There remains some uncertainty regarding the drainage arrangements on site, including the agreed sample point for the purpose of the permit and for internal reporting. The connectivity of the interceptor to the wider site drainage and it's discharge point needs to be confirmed. There is also uncertainty surrounding the inlets and outlets to the lagoon and the final discharge point.

Whilst there is an emergency spill procedure and all employees are made aware of this during inductions, there is no refresher training or formal follow up. Likewise there is an

Emergency Response Procedure, but this has not been tested.

Housekeeping in the diesel storage area and garage remains poor. Acco style drains were silted and there was poor storage of potentially contaminating liquids. The Operator confirmed that environmental “issues” were included in manager meeting agendas, but there was limited interaction with other employees. This disconnect was potentially the cause of poor housekeeping and reporting of minor incidents as identified in the previous CAR (reference NRW0044620).

Overall the above findings indicate that whilst there have been some improvements since the last site visit, there remains a discontinuity between the documented processes and procedures required by the permit and their application on site. **These breaches of Condition 1.1 General Management have been consolidated and Scored C3.**

Actions

- **Action 1** – Investigate the site drainage arrangements and provide an up to date comprehensive drainage plan to NRW by **4 August 2025**.
- **Action 2** – Confirm and label water sampling locations, both on site and on a plan, to ensure continuity of sampling and prevent samples being recovered from the incorrect location. Provide a sample location plan to NRW by **4 August 2025**.

Please note further non-compliance scores may be applied upon receipt of the information requested.

Recommendations

- A work instruction providing a step by step guide for taking and scheduling water samples would be beneficial.
- It would also be prudent to undertake an assessment of the integrity of the drainage system and incorporate any findings into a repair and maintenance plan.
- It is recommended that refresher training is provided on the spill procedure and the emergency response is tested. Where necessary both should be updated to reflect on site conditions /restrictions.
- It is recommended that the SHE Manager undertakes regular inspections of the site, with particular emphasis on those locations with the highest environmental risk. Dialogue with supervisors /managers in these areas should be encouraged to ascertain the barriers to environmental improvement and to establish a stronger environmental ethos.

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.