

Compliance Assessment Report CAR_NRW0048570

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: 11/06/2025 between 10:30 and 11:30.

Parts of permit assessed: See Below .

NRW Lead Officer: Carter Shone, accompanied by Rebecca Harwood.

Report sent to: Environmental Manager, Environmental Manager, on 24/06/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.1
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IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.1
IR4C - Installations - Information - Notification	C3 Minor	4.3.2
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR3D - Installations - Emissions and monitoring - Noise and vibration	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
5	20

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
IR3E	See action 1	31/07/2025
IR3B	See action 2	30/09/2025
IR3B	See Action 2	30/09/2025
IR3B	See action 2	30/09/2025
IR3B	See action 2	30/09/2025
IR4C	See action 3	Already completed

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 after Senior Industry Regulation Officers Carter Shone and Rebecca Harwood visited the 2 Sisters Sandycroft site. This was a pre-arranged familiarisation and site inspection.

Officers were accompanied around the site by the site Operations Manager, site Environment Manager and Head of EHS - UKP

Permitted activities

In general, the site was clean and tidy with no compliance issues observed.

On arrival to the site, Officers observed that the righthand roller shutter door into the 'carcass building' was open. When Officers then came to that area of the site during the inspection the door was still open. When asked, the Operator stated that the door could only be operated manually as the electric

function was not working. The Operator closed the door when asked.

Advice and Guidance: The Operator is reminded that in accordance with their own operating techniques the roller shutter doors to the carcass building must be closed when not in use.

Monitoring

Officers were informed that the second part of the CSA audit for the MCERTS flow meter would be taking place at the end of the month (June).

Action 1: Please report the results of this to NRW when received .

Noise

There have been 9 noise complaints made to NRW since the last inspection on 13th March 2025. The reports indicated a general low frequency drone like sound.

The Operator informed NRW officers that the acoustic fencing to be placed along the north west perimeter of the site is due to be installed in July.

The site investigation into the noise report received on the 30th May 2025 revealed that an oxygen delivery was taking place at 2330 and that this was most likely the cause of the noise. The operator informed the officers this was due to a delay in the delivery arriving onsite.

The operator agreed that in future oxygen deliveries would not take place between the hours of 2000 to 0600.

Permit variation

At the time of the visit the construction for the new chiller unit was under way.

This new unit will require a permit variation before it can be operated. The Operator was reminded that they needed to submit their permit variation to avoid any delays in using the new chiller unit and of the current delays in determining permit applications/variations.

Odour

An offsite odour review was undertaken prior to the site inspection. Officers visited a number of residential locations surrounding the site, no odour was detected

No compliance issues that could have given rise to offsite odour were found during the inspection.

Schedule 5 Notifications

Five Schedule 5 notifications of abnormal emissions were submitted to NRW relating to dates between 24th August 2024 and 20th May 2025.

24/08/24: Approximately 500kg of R434A Refrigeration Gas was released between 1600 – 1800. The leak was isolated, Brooktherm then repaired a copper line that had worn and split.

Score (IR3B) Emissions of substances not controlled by emission limits. Permit Condition 3.2.1. Compliance Score C3

11/10/24: Approximately 400kg of R407F Refrigeration Gas was released between 1600 – 1800. The leak was identified and the system was isolated. Brooktherm repaired the line. The distribution lines were reinforced/secured to stop vibration. The operator is looking into if there is any monitoring device to check inside the AHU's/daily check to be done on the internal detection system.

Score (IR3B) Emissions of substances not controlled by emission limits. Permit Condition 3.2.1. Compliance Score C3

25/03/25: Approximately 55kg of R407F Refrigeration Gas was released between 0800 – 1300 from Evaporator SAN2133. Evaporator was isolated and repaired immediately on discovering the leak. Evaporator leaks to be checked every 3 months by Brooktherm.

Score (IR3B) Emissions of substances not controlled by emission limits. Permit Condition 3.2.1. Compliance Score C3

11/04/25: Approximately 55kg of R407F Refrigeration Gas was released between 0900 – 1100 from Evaporator SAN2133. Evaporator was isolated and repaired immediately on discovering the leak. Evaporator leaks to be checked every 3 months by Brooktherm.

20/05/25: Approximately 50kg of R407F Refrigeration Gas was released between 0600 – 1200 from Evaporator SAN2122. An Evaporator was isolated and repaired immediately on discovering the leak. Operator stated that Evaporator leak checks will be carried out every 3 months by Brooktherm.

Score (IR3B) Emissions of substances not controlled by emission limits. Permit Condition 3.2.1. Compliance Score C3

Action 2: As the most recent leaks all appear to be related to the same part of the plant the Operator should undertake an investigation into root cause of leaks and report on how these can be avoided in future. This should be submitted to NRW by 30/09/2025.

These scores have not been consolidated as the breaches took place over separate quarters (Q3 and Q4 2025, Q1 and Q2 2025).

The Schedule 5 notifications relating to the 24/08/24 and 11/10/24 were not reported to NRW in the time frame specified in permit condition 4.3.2. This has resulted in the following score.

Score (IR4C) Notification . Permit Condition 4.3.2. Compliance Score C3

Action 3: Ensure Schedule 1 notifications are submitted within the time frames specified in

permit condition 4.3.2.**Improvement condition**

The operator has submitted their noise management plan to NRW in accordance with improvement condition 16B:

'Following completion of IC16a, a Noise Management Plan for the whole site shall be submitted to Natural Resources Wales. This shall be completed in line with guidance set out in Noise and Vibration Management: Environmental

This is currently being reviewed by NRW

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.