Compliance Assessment Report CAR_NRW0048699

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: Audit,

Reason: Routine.

On: 03/07/2025.

Parts of permit assessed: Management System, Q2 monitoring returns.

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

Report sent to: Environmental Officer, Environmental Officer, on 11/07/2025.

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	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	
IR1A - Installations - Management - General Management	Assessed (A)	
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR2C - Installations - Operations - Operating techniques	Assessed (A)	

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?

No action required.

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 was a planned pre-arranged audit and inspection of the site's environmental management system (EMS) following a breach of the permit condition 1.1 General Management and associated issues raised in CAR_NRW0046457.

The following documents were reviewed prior to the audit:

QP099 – Maelor Environmental Organisation Chart

EMS 9.1.13.6 – Breakdown of Environmental Equipment Procedure

EMS9.3.1.6.1 - Permit Compliance with W1

EMS9.8.2.4 – Process Change Management

SOP7.2.350.1 - External Lab Sampling and Documentation

SOP7.2.271.4 - ETP Testing DR3900

SOP7.2.338.1 - Ammonia (NH3-N) Spike Diagnosis, Troubleshooting and Control

SOP7.2.311.3 – NRW Returns Procedure

Associated training records were also provided for these documents.

During the visit the Environmental Officer provided an overview of the EMS and a detailed assessment of each part of the ISO 14001 standard . The site had previously undertaken a gap analysis on the current EMS to ISO 14001. Where gaps had been identified new procedures and documents have been created. Almost 20 new documents have been introduced and all previous documents have been revised.

Document Management

A variety of documents were viewed during the audit. Documents are managed through a shared drive which a number of people can access and change. The site are currently looking into a range of document management systems to provide a more robust audit trail and better document control.

Roles, responsibilities and resources

Leadership, commitment and resources were demonstrated through the organisation chart (QP099) and Environmental Management Responsibilities (EMS9.5.2.2). Discussions were held around contingencies if key members of staff were not available at times and the roles that would provide cover. The site has now appointed a Health Safety & Environment (HSE) Manager who is available to assist in environmental responsibilities. NRW reiterated the need for the EMS to be resourced adequately and ensure that contingencies are in place and evidenced in other personnel roles and responsibilities.

Training & Competency

A skills matrix was viewed for Effluent Treatment Plant (ETP) staff and training records on new procedures were provided prior to the audit. The site also engages the services of a consultant to advise on any issues that may arise during biological treatment in the ETP.

Supervisors, department managers and charge hands will be given specific environmental training and an awareness of the permit requirements. The training content was viewed but this has yet to be rolled out. This is due to be completed by the end of 2025. A training matrix has been developed which was viewed of what job roles require this training. Training progress will be checked on future regulatory visits.

Communication and engagement of all staff on the EMS was discussed during the visit and the site will look to improve this in the future.

Internal Audits

Prior to the gap analysis there was no internal audit programme in place to audit the EMS. Procedures and audit schedules were viewed, which are yet to be implemented and a completed audit was not available to view. Completed audits will be checked during future visits.

Noise and odour monitoring was discussed and a recently completed daily check was viewed from 03/07/25.

Maintenance

Maintenance is managed through an online maintenance system. The Planned Preventative Maintenance (PPM) was viewed for the ETP and scrubber. All critical spares for the ETP and scrubber have been ordered and will be added to the online system.

Site Inspection

A site inspection was undertaken during the audit. At the time of the audit the site was clean and tidy with no effluent in the emergency pits. A collection of waste sludge had just occurred when the ETP was viewed and there was a moderate localised odour around the area during the inspection. All parameters displayed on the HMI at the discharge point (W1) were within the permitted limits. The temporary filter press was not in operation at the time of the inspection as the site was having issues with the flocculant that was being used. The ETP operator who was working at the time of the inspection appeared to possess a good knowledge of the ETP process and was in the middle of running a COD test. It was clear that operators knew who and how to raise and escalate any issues on the ETP.

The connection from the screening transfer chute to a dolav has still not being repaired but the site is waiting for a fabricated chute from the internal maintenance team. Pumping was still ongoing at Borehole 2 to confirm it would be suitable for abstraction. The door to the lairage area was open during the inspection, however a full trailer entered the area shortly after. Discussions and updates were provided on the installation of noise reduction and attenuation measures required by the permit variation.

Chemical storage and boilers were also viewed and no issues were identified. The site also hold an inventory of the different chemicals that are stored on site for use on the abatement equipment and for use inside production areas.

It was clear to Officers that the Environmental Officer has spent considerable time and effort to improve the EMS and demonstrated that significant progress has been made.

The enforcement response for the Category 2 breach in CAR_NRW0046457 will be communicated separately.

Q2 2025 monitoring returns.

The Q2 monitoring returns were received on 1st July 2025 for discharges from emission point W1 in compliance with permit condition 4.2.3. The monitoring was undertaken in accordance with permit condition 3.6.

All reported parameters were in compliance with the Emission Limit Values (ELV's) applied by Permit Condition 3.1.2, Schedule 3, Table S3.2 (a).

Records of weekly visual checks for W2 and W3 emission points for Q2 2025 were also provided in compliance with permit condition 3.6.1, Schedule 3, Table S3.2 (a).

Monthly meter readings for the borehole extraction were also submitted.

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.