

Compliance Assessment Report CAR_NRW0049005

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: 29/07/2025 between 10:30 and 11:45.

Parts of permit assessed: See Belown.

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

Report sent to: Environmental Manager, Environmental Manager, on 05/08/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR3C - Installations - Emissions and monitoring - Odour	C3 Minor	3.3.1
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR1A - Installations - Management - General Management	C3 Minor	1.1.1

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

Total non-compliances recorded	Total non-compliance score
3	12

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
IR3C	See action 1	31/08/2025
IR1A	See action 1	31/08/2025
IR1A	See action 2 (Completed)	Already

Criteria	Action needed	Complete by
		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 unannounced site inspection.

Officers were accompanied around the site by the Environmental Manager and Maintenance Manager.

Odour

During an off site inspection before visiting site, Officers picked up an odour at the end of Rectors Lane that they identified as an odour associated with the 2 Sisters site.

During the on-site inspection, when Officers visited the Offal gantry / trailers area, the catch pits, designed to remove liquid discharge from the trailers (which includes viscera and blood) were not correctly installed, causing the discharge to completely miss the catch pits and drain on to the ground. One of the catch pits that was in place was not effective as the pipe that connects it to the drain had not been placed in the drain.

See images below. (Nb: the time of these photos are in GMT not BST).





This issue has been raised by NRW Officers previously.

As Officers were inspecting the catch pits, a blocked pipe caused a large amount of discharge (which includes viscera and blood) to spray down from the offal gantry pipe onto the ground.

The Operator has now confirmed that they have added an hourly check of the gantry including the feather press, screens, offal screens and pipe work to their procedure. This procedure may be checked by NRW during future inspections.

NRW Officers believe that the discharge observed was the source of the offsite odour, resulting in the following score:

Score: IR3C – Odour. Permit Condition 3.3.1. Compliance Score C3.

The Operators Odour Management Plan (OMP) states in relation to the water discharge from the trailers *'The feathers are then collected in a trailer, before removal from site. Positive discharge into the trailer which run off to drain (through catch pits connected to the pipes which go straight into the drain, The feathers and water can produce odours.'*

As the activities mentioned above are in breach of the sites OMP, it has resulted in the following score:

Score: IR1A – General Management. Permit Condition 1.1.1. Compliance Score C3.

Action 1: Ensure that staff using the catch pits are aware of the proper operation procedure via training. Document this and send to NRW.

Noise

Officers were shown the new acoustic fencing along the north west perimeter which has now been fully installed.

On advice of NRW the Operator has implemented daily checks of the fence for any damage into their planned preventative maintenance schedules.

On the 22nd June 2025 NRW received a report (WIRS2505852) of noise from the site.

The site investigation revealed that night-time and early morning trailer movements did occur, and the site did not fully adhere to the controls outlined in the Noise Management Plan, particularly regarding vehicle movement restrictions and noise-sensitive hours.

This has resulted in the following score:

Score: IR1A – General Management. Permit Condition 1.1.1. Compliance Score C3.

Action 2: (Completed) Re-train Dispatch Night Operators on the dispatch yard noise procedure.

Monitoring

The site is currently in the process of obtaining a CSA certification for its MCERTs flow meter.

The CSA audit took place in June but was changed to a pre assessment giving the site time to rectify identified issues.

If the site does not gain the CSA certification for the flow meter, it would not meet the standard required by the permit and therefor would be classed as a breach.

Permit variation

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

NRW emphasised that 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. There is currently a substantial delay in determining permit

applications/variations. At the time of the visit the variation had not been submitted to 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.