Compliance Assessment Report CAR_NRW0049364

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:** 11/09/2025 between 10:00 and 14:00. **Parts of permit assessed:** See below.

NRW Lead Officer: Victoria Taylor. **Report sent to**: UK Health & Safety and Environment Manager , UK Health & Safety and Environment Manager , on 17/10/2025.

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	1.1.1
IR1D - Installations - Management - Efficient use of raw materials	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.1
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.1

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
IR1A	See Action 4 below	31/10/2025
IR1D	See Action 9 below	27/02/2026
IR3B	See Action 1 below	31/10/2025
IR3B	See Action 2 and Action 3 below	31/10/2025

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 11 September 2025 and met with the Prysmian UK Health & Safety and Environment Manager and the recently appointed Safety Health Environment and Quality Manager (Wrexham Plant).

The purpose of the site inspection was to undertake an external inspection of the site and review the data /evidence provided to support non-compliance actions raised during the previous site inspections on 19 June 2024 (CAR_NRW0044620) and 8 April 2025 (CAR_NRW0048130).

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 facility, with particular emphasis on the isocyanate storage area, diesel storage and garage /maintenance area.

Previous site inspections highlighted a discontinuity between the documented processes and procedures required by the permit and their application on site. NRW considered that this discontinuity has been a reason for poor housekeeping and associated potential environmental impact.

The Operator confirmed that incident reporting training is provided to all staff. There is a daily site managers meeting, periodic site management walk throughs and associated daily reports. Near miss reporting is being reviewed by the operations management team. It is currently a paper based /reporting book system, but is to be updated to a digital /tablet based system, operating on the same principles. A brief review of the paper records revealed that they were primarily health and safety based and the actions element, in many cases, had not been updated and /or communicated to the reporter.

The Operator has recently developed some internal documentation which has been provided to NRW to evidence how improved incident management and communication will be addressed. The Site Management Walkthrough guidance document (reference GL_HSE_001-EUR, version 1), dated 2 September 2025 and associated training /workshop material was provided to NRW to demonstrate the Operators commitment to improvement. A review of these documents has identified that whilst notable, the focus is primarily on health and safety and efficiency improvement. There is no apparent reference to protection of the environment and associated good practice and reporting.

Recommendation 1 – it is recommended that the Site Management Walkthrough include reference to environmental protection.

Recommendation 2 – it is recommended that provision is included in the proposed digital system to include an automatic feedback function to the reporter and any actions, mitigation and/or conclusions to be disseminated to the wider team(s).

Garage & Bulk Diesel Storage Area
Whilst there has been some improvement in the diesel storage and garage area, housekeeping generally remains poor. Diesel spills and recent staining was evident outside the diesel bund adjacent to the in-bund filling point. The “Acco” style drains were fully silted, rendering them ineffective for the transfer of oily /contaminated water to the interceptor. Previous inspections had highlighted the need for preventative maintenance in this area and improved reporting and inspection. The status of the drains indicates that this has not been implemented. ***NRW consider this to be a breach of permit condition 1.1.1 and a non-compliance score C3 has been applied (IR1A General Management) .***

A surface water drain is located immediately down gradient from this area and the current arrangements mean that contamination can readily flow into the surface water system during periods of rainfall or in the event of a spill. The surface water drainage system is discharged into Afon Clywedog (controlled waters) without mitigation. ***NRW consider this to be a breach of permit condition 3.2.1 and a non-compliance score C3 has been applied (IR3B Emissions of substances not controlled by emission limits).***

The Operator has confirmed that CAPEX has been approved for the construction of an improved vehicle washdown area, which will incorporate the diesel tank and filling point. The proposed improvements will ensure that any spillage from the diesel tank when filling is collected in a bunded tank away from the freshwater surface drains. The works are expected to be completed at the end of June 2026.

Action 1 - Whilst improvements to the diesel storage and vehicle washdown locations are proposed, the existing drains in this area should be cleaned out on a regular basis to minimise potentially contaminated run-off entering the surface water drainage system. Photographic evidence that this has been undertaken is to be provided to NRW by **31 October 2025**.

General On-site Observations
Housekeeping across parts of the site were good but some areas were less well organised. Redundant materials appeared to have been stored on parts of the site, with no apparent onward use for a significant period of time.

An area of dark brown /black discolouration appeared to be being discharged from stacks /vents and running down the external walls along the western side of the main facility building. The staining extended down to ground level and there was evidence that it was reaching the surface water manhole in the immediate vicinity. ***NRW consider this to be a breach of permit condition 3.2.1 and a non-compliance score C3 has been applied (IR3B Emissions of substances not controlled by emission limits).***

The discolouration appeared to have been occurring for a significant period of time, but had not been reported internally or to NRW. ***NRW consider this to be a breach of permit condition 1.1.1 (IR1A General Management). As a score has already been applied for General Management, further scoring has not been applied.***

Since the site inspection, the Operator has provided evidence that the surface water drain has now been protected with a dedicated drain guard. The Operator is also investigating the source of the staining and have submitted samples for laboratory analysis to determine its composition.

Action 2 – Provide NRW with findings of laboratory analysis and confirmation of the source of the material by **31 October 2025.**

Action 3 – Subject to findings of Action 2 (above) develop a programme of improvement and mitigation to prevent potentially contaminative releases and provide to **NRW by 31 December 2025.**

Diphenyl methane di-isocyanate (MDI) Storage
MDI is used and stored in bulk at the facility. The bulk tank is located within a dedicated MDI storage tank building in the west of the site, and immediately adjacent to the western boundary of the facility. The filling point and associated gantry is situated outside the building. Spill kits, drain guard covers and emergency response notices were clearly evident in the fill point area.

The Operator provided the relevant procedures associated with the bulk MDI for review, as follows:

- Bulk Delivery/Collection of Flowable Materials and Waste Oil/Water Decanting (PWXE9, dated 9 December 2020).
- Major Incident Action Plan (H&S 5:5, dated 7 February 2023)
- Emergency Procedures - 'Spillages' (H&S 5: 3 1 February 2021)

The volume of the tank is reported by the Operator to be 51 tonne or 63,000 litres.

<u>Environmental Incident Reporting</u>

Previous site inspections highlighted a discontinuity between the documented processes and procedures required by the permit and their application on site. NRW considered that this discontinuity has been a reason for poor housekeeping and associated potential environmental impact.

The Operator confirmed there is a daily site managers meeting, periodic site management walk throughs and associated daily reports. Near miss reporting is being reviewed by the operations management team. It is currently a paper based /reporting book system, but is to be updated to a digital /tablet based system, operating on the same principles. Incident reporting training is provided to all staff.

A brief review of the paper records revealed that they were primarily health and safety based and the actions element, in many cases, had not been updated and /or communicated to the reporter.

The Operator has recently developed some internal documentation which has been provided to NRW to evidence how improved incident management and communication will be addressed. The Site Management Walkthrough guidance document (reference GL_HSE_001-EUR, version 1), dated 2 September 2025 and associated training /workshop material was provided to NRW to demonstrate the Operators commitment to improvement. A review of these documents has identified that whilst notable, the focus is primarily on health and safety and efficiency improvement. There is no apparent reference to protection of the environment and associated good practice and reporting.

Action 4 - Incident training and associated reporting to be updated to include environmental awareness, risk and response. Evidence of the updates to be provided to NRW by **31 December 2025.**

<u>Status of Previous Actions</u>

The status of the actions raised following the previous site inspection, are summarised below.

Previous Action 3 – CAR_NRW0044620 (June 2024). 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.

Evidence provided confirming appointment of individuals to roles to support permit compliance requirements. **Completed**.

Previous Action 1 – CAR_NRW0048130 (April 2025). Investigate the site drainage arrangements and provide an up to date comprehensive drainage plan to NRW by 4 August 2025.

A review of the drainage arrangements at the site has been undertaken; this included a CCTV survey, which was undertaken in August 2025. The CCTV survey covered the main process areas, but did not extend to the wider site. It is understood that the Operator is to commission further CCTV survey to cover the remainder of the site.

The principle findings of the drainage review and the CCTV survey are as follows:

- The surface water system drains the external areas of the site including the roof and internal roads. The staff carpark is also connected to the surface water drainage system; the Operator confirmed that an interceptor is not present in this area. The surface water drainage systems discharges directly to the watercourse.

- Process water is recirculated via the lagoon, where it is cooled and transferred back into the process as cooling water. The lagoon is drawn down annually and discharged via the pen-stock to the watercourse. The lagoon is then de-silted and the sludge is transported off site as hazardous waste. Following maintenance and when required, the lagoon is topped up with Grade III (industrial water).

- Sanitary and welfare water is discharged via the foul sewer. The CCTV survey identified a combined sewer line, but the connectivity is uncertain, as is the foul sewer discharge point. Discharge us currently assumed to flow off site to a main sewer on Bryn Lane but clarification is required.

- The Operator originally understood there to be a single oil water interceptor on site, located in the diesel tank bund /garage area. The survey has since identified potentially 5No additional interceptors across the area surveyed. It is understood that the outflow from these interceptors is to the surface water system, but clarification is required.

Based on the findings of the drainage review and CCTV survey the following are to be actioned by the Operator:

Action 5 - Provide NRW with the dates and programme for undertaking the remaining CCTV survey, by **31 October 2025**.

Action 6 – Review the findings of the CCTV survey in the context of the on-site activities and identify any potential pollution pathways, from site activities to the surface water drainage system. Provide a summary of the review to NRW by **30 November 2025**.

Action 7 – Include the maintenance and cleaning of the interceptors and ancillary connecting drainage on the site preventive maintenance plan and provide evidence to NRW by **30 November 2025.**

Previous Action 2 – CAR_NRW0048130 (April 2025). 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.

The Operator is still in the process of updating the relevant procedure and associated supporting information.

Action 8 - Provide updated sampling procedure to NRW by **31 October 2025.**

<u>On-site Water Usage</u>

The Operator has reviewed the water supply and usage volumes at the site and confirmed the following:

- Approximately 30tonnes of Grade I (towns) water is used on site each year.
- An estimated 70tonnes of Grade III (industrial) water is used on site each year.

Grade I water is for welfare use only and there isn't a canteen on site. Given that typically there are approximately 130 staff on site per day, there is concern that a disproportionate amount of Grade I water is being used on site.

Action 9 - Review the Grade I water use and identity the reason and or justification for the volumes used on site. **Provide a summary of the findings to NRW as part of the 2025 Annual Report.**

Notwithstanding the above, NRW acknowledges the work undertaken to date by the UK HSE Manager and the site SHEQ Manager and their commitment to environmental improvement at the site.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

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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.