

## Compliance Assessment Report CAR\_NRW0049668

**Permit being assessed:** WP3534GX.

**For:** Wrexham Convenience Foods, **held by:** Oscar Mayer Limited

**At:** Ash Road South, Wrexham Industrial Estate, Wrexham, Wrexham, LL13 9UG.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 14/10/2025 between 10:10 and 11:15.

**Parts of permit assessed:** See Report.

**NRW Lead Officer:** Kathryn Bradshaw, accompanied by Rick Prichard.

**Report sent to:** Head of Health, Safety & Environment, Head of Health, Safety & Environment, on 21/10/2025.

### 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                  | Assessed (A)      |                  |
| IR2A - Installations - Operations - Permitted activities                | Assessed (A)      |                  |
| IR2B - Installations - Operations - The site                            | Assessed (A)      |                  |
| IR2E - Installations - Operations - Improvement programme               | Assessed (A)      |                  |
| IR2C - Installations - Operations - Operating techniques                | Assessed (A)      |                  |
| IR3A(1) - Installations - Emissions and monitoring - Emissions to water | Action only (X)   |                  |

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?

| Criteria | Action needed                                                                                                               | Complete by |
|----------|-----------------------------------------------------------------------------------------------------------------------------|-------------|
| IR3A(1)  | Arrange for the calibration of the measuring equipment and forward the records once completed to NRW by 31st December 2025. | 31/12/2025  |

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.

### **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 compliance assessment report (CAR) has been raised following a routine pre-arranged site inspection.

We were met on site by the Head of Health, Safety & Environment who accompanied us throughout the visit. We were also joined by the Maintenance Manager for a time during the inspection.

Discussions were held on the outstanding actions from the OMA water audit;

1. Calibrations and servicing for the measuring equipment including the flow meter and auto-sampler need to be completed in line with manufacturers recommendations with the relevant schedules highlighted in the maintenance system.
2. Ensure a 24-hour flow proportional sample is sent to a UKAS accredited lab for analysis for the parameters detailed in Table S3.3 on a monthly basis and results forwarded to NRW.

The measuring equipment has still not been calibrated and the Maintenance Manager is in the process of arranging this.

### **Action**

Arrange for the calibration of the measuring equipment and forward the records once completed to NRW by 31st December 2025.

The site has samples taken twice a month by Dwr Cymru Welsh Water (DCWW) and will continue to use these results to monitor performance of the Effluent Treatment Plant (ETP).

A full site walk round was conducted starting with the ETP. When inspecting this area it was noted that the online pH monitor was reading 5.85 at the discharge point. This is below the limit required by your DCWW consent to discharge. No alarms were raised and the control panel was showing green. No staff were available to manually dose the system to raise the pH. Verbal advice was provided during the visit on the importance of meeting

consent limits. The Maintenance Manager explained that chemical dosing is currently manual but they are looking to fully automate this process.

The site is looking to purchase and install a new autosampler. It is advised if purchasing a new autosampler it has MCERTS accreditation as per Permit Condition 3.5.3;

*Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by Natural Resources Wales.*

The site has installed a filter press for the sludge that is produced to further optimise the ETP and provide more savings on transport costs. This waste is currently disposed of by anaerobic digestion.

We viewed the chemical and waste storage areas. A can crusher and baler have been installed to further improve efficiencies from waste that is produced across the site.

The facility has reduced food waste from within the factory by 25% and are looking to make further efficiencies through improved waste segregation.

### **Improvement Condition 11**

*The Operator shall submit to Natural Resources Wales an updated written procedure following additional investigatory work describing how they intend to meet the following BAT requirements in accordance with the requirements specified within:*

- *BAT Conclusion 9 of the Food, Drink and Milk Industries BRef Document (EU 2019) – In order to prevent emissions of ozone depleting substances and of substances with a high global warming potential from cooling and freezing, BAT is to use refrigerants without ozone depletion potential and with a low global warming potential*

The site submitted the following on 2<sup>nd</sup> May 2025;

*Complete inventory of ozone depleting substances and F-gases that are used on site. This should identify all the systems on site, type and system capacity. It should include an assessment of the global warming potential of these refrigerants and state whether the refrigerants used on site currently meet the BAT requirements.*

The long term plan is to install a glycol ring main system but no definite dates or plans have been set as yet. In the short term, systems will be replaced with low global warming potential refrigerants as and when they reach end of life.

This Improvement Condition has now been met.

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](mailto: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](mailto: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.