

## Compliance Assessment Report CAR\_NRW0049088

**Licence being assessed:** WA/067/0007/0015.  
For: Maelor Poultry, held by Maelor Foods Limited.  
At: Pickhill Lane, Cross Lanes, Bangor on Dee, Wrexham CBC, LL13 0UE.

**Type of assessment:** Report/Data Review, Reason: Routine.  
On 29/10/2025.

Parts of licence assessed: See report

**NRW Lead Officer:** Kathryn Bradshaw, accompanied by Richard Smith.  
**Report sent to:** Environmental Officer, Environmental Officer, on 03/11/2025.

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

Part of licenced activity assessed (criteria)	Assessment result	Licence condition
WR-A6 - Water Abstraction - Abstraction specified by licence - Quantities	C3 Minor	6.1
WR-B1 - Water Abstraction - Abstraction measurement and records - Means of measurement	Assessed (A)	
WR-B2 - Water Abstraction - Abstraction measurement and records - Recording	Assessed (A)	
WR-B3 - Water Abstraction - Abstraction measurement and records - Reporting	Assessed (A)	

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

### 2. What action is required?

Criteria	Action needed	Complete by
WR-A6	Pump speed has been reduced, installed an inverter and improved tank storage level controls	Already completed

Action 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 or civil sanctions being imposed depending on the circumstances of the offence.

**You are non-compliant with your licence.**

**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 following submissions of Schedule 5 notifications of a breach of abstraction licence.

On 22nd July 2025 a schedule 5 notification was received to inform NRW that the daily volume of extracted water had been exceeded on the following dates;

04/07/25 - 1416m<sup>3</sup>

05/07/25 - 1401m<sup>3</sup>

16/07/25 - 1376m<sup>3</sup>

The daily limit on the abstraction licence is 1350m<sup>3</sup> as detailed in licence condition 6.1.

These abstraction volumes, whilst exceeding the daily volume limit, are within the 5% allowance and therefore will not be subject of enforcement action.

The issue was caused by the pump speed being altered without consideration of the environmental impacts.

The site has now made adjustments to the pump speed to ensure it can no longer be adjusted to extract more than the limits specified in the permit. The pump will also be separately locked off with restricted key access to prevent re-occurrence.

The root cause links to issues with the management system which were highlighted in CAR\_NRW0046457.

As detailed in the management system audit (See CAR\_NRW0048699) role out of environmental training to key personnel is still being undertaken. This will be checked during future inspections.

On 30th September a Schedule 5 notification was received to inform NRW that the daily volume of extracted water had been exceeded on 26th September 2025. The limit is 1350m<sup>3</sup> per day and the daily volume extracted on 26th September was 1446m<sup>3</sup>.

### Score C3, Permit Condition 6.1

Measures taken to prevent re-occurrence are detailed below;

Volume is currently controlled by motor speed which was set at 42 Hz which had previously abstracted 1350m<sup>3</sup>. This has been reduced to 40Hz and a separate PLC programme to implement improved tank storage level controls has been installed.

A site inspection was conducted on 29th October 2025 in company of an NRW, Water Resource Officer (WRO). The issue of over abstraction was discussed and remedial actions to prevent a future repeat are deemed to be satisfactory. Meter reading was taken as 25602 cubic metres.

WRO attempted to take readings of abstraction over a period of 60 seconds to calculate the approximate instantaneous flow rate although very little abstraction was taking place due to the water tank being at capacity. This was discussed with the Maelor Foods representative and agreed that arrangements will be made to record this data at an appropriate time with evidence being forwarded to NRW.

The Water Resources Abstraction license has an instantaneous abstraction flow rate limit of 15.63 Cubic Metres a second, the adjustments to the system made by Maelor Foods has been capped to 15 Cubic Metres to prevent future recurrence of the over abstraction.

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 licence is issued to you under the Water Resources Act 1991 as amended by the Water Act 2003. You have a responsibility to comply with the conditions of your licence and prevent pollution/harm to 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.

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
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

### If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend non-compliance for up to six months to allow time for remedial action to be taken. These will be re-instated if the action is not completed.

**Full list of Water resource action criteria** (used in section 1 and 2):**WR A: Abstraction specified by Licence**

- WR-A1 Source of supply
- WR-A2 Points of abstraction
- WR-A3 Means of abstraction
- WR-A4 Purposes of abstraction
- WR-A5 Period of abstraction
- WR-A6 Quantities
- WR-A7 Land
- WR-A8 Other specified on licence

**WR B: Abstraction measurement and records**

- WR-B1 Means of measurement
- WR-B2 Recording
- WR-B3 Reporting

**WR C: Surface / Groundwater level and protected flow**

- WR-C1 Minimum hands-off flow/level requirements
- WR-C2 Flow/level measurement devices
- WR-C3 Recording
- WR-C4 Reporting

**WR D: Environmental monitoring and information**

- WR-D1 Recording
- WR-D2 Reporting
- WR-D3 Notifications

**WR E: Fish and eel passage**

- WR-E1 Infrastructure specified by licence
- WR-E2 Maintenance and records

**WR F: Discharge**

- WR-F1 Point of discharge
- WR-F2 Infrastructure
- WR-F3 Measurement
- WR-F4 Recording
- WR-F5 Reporting

**WR G: Impoundment specified by licence**

- WR-G1 Inland water to be impounded
- WR-G2 Manner and extent of impoundment
- WR-G3 Point(s) of impoundment
- WR-G4 Construction and removal requirements
- WR-G5 Other specified on licence

**WR H: Borehole infrastructure**

- WR-H1 Infrastructure and accessibility
- WR-H2 Maintenance and calibration

**Enforcement response**

Any licence condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution or civil sanctions. 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 20 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 (Mon to Fri 08:00 – 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.