

Compliance Assessment Report CAR_NRW0049866

Permit being assessed: BX8289IW.

For: Soft Drinks Site– Cardiff, **held by:** Princes Ltd

At: Portmanmoor Road, East Moors, Cardiff, South Wales, CF24 5HB.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 30/07/2025 between 10:00 and 12:00.

Parts of permit assessed: 1.1.1, 4.2.2 & 4.2.3 Reporting.

NRW Lead Officer: Brigid Armstead.

Report sent to: Environment, Health and Safety Coordinator, Princes , on 10/11/2025.

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

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

Total non-compliances recorded	Total non-compliance score
1	4

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	Complete a review and strengthening of the Management of Change process within the Environmental Management System to ensure resilience during staff changes and project work. The operator must allocate sufficient resources and competent personnel, implement a robust written management system, and provide staff training on permit compliance. All outstanding reports and evidence of MoC integration into the EMS should be provided to NRW by 31 January 2026.	31/01/2026

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.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

This CAR is to record a site visit on 30th July 2025 by Natural Resources Wales (NRW) Officer BA to Princes Soft Drink Site. The site visit included a discussion with the EHS Coordinator and Engineering Manager regarding containment and reporting. This CAR also includes a record of the Q2 and Q3 reports received and responses to outstanding actions

Q2 and Q3 2025 Emissions

The 2025 Q2 and Q3 Emissions monitoring results were received by NRW on 1st July 2025 and 2nd October 2025 respectively, in compliance with permit condition 4.2.3.

Outstanding Reports

2024 Annual Reporting - NRW received E1, PI1 and WU1 for 2024, on 10th Oct 2025.

Emissions to sewer 2024 - The 2024 annual monitoring results for Mercury and Cadmium at monitoring site S1 have not been submitted on the form specified or within the timeframe specified in permit condition 4.2.3b. *CAR_NRW0048644 dated 24/6/25 included a C3 non compliances with permit condition 4.2.3 and actions for the operator to provide a root cause for non compliance.*

Princes representatives have stated that the late reports are due to turnover in the roles with environmental responsibility and resource time taken by the improvements to site.

The root cause of this failure is identified as an inadequate Management of Change (MoC) process within the sites Environmental Management System (EMS). Staff turnover and resource diversion during site improvement projects led to a breakdown in compliance continuity. The operator's management system did not adequately embed MoC principles to ensure that environmental responsibilities were maintained during organisational changes.

A category 3 non compliance with 1.1.1 is given due to a General Management failure.

Action: Complete a review and strengthening of the MoC process within the EMS to ensure resilience during staff changes and project work. The operator must allocate sufficient resources and competent personnel, implement a robust written management system, and provide staff training on permit compliance. All outstanding reports and evidence of MoC integration into the EMS must be provided to NRW by 31 January 2026.

2024 Review of results of monitoring and assessment - NRW have previously agreed to the reporting required under condition 4.2.2(a) being submitted by 30th April each year. This was agreed

in CAR_NRW0041865. A category 4 non-compliance was given in CAR_NRW0048644 dated 24/6/25 due to failure by the operator to submit the requirements of 4.2.2(a) by the 30th April 2025. *NRW has to date not received the review of monitoring as required under condition 4.2.2(a).*

The root cause of this failure is identified as an inadequate Management of Change (MoC) process. **A category 3 non compliance with 1.1.1** is given due to a General Management failure (consolidated).

Action: All outstanding reports and evidence of MoC integration into the EMS must be provided to NRW by 31 January 2026.

2024 Wastes

Form R1 has not been received by NRW for 2024 as required under permit condition 4.2.2. CAR_NRW0046424 included a non compliance with condition 4.2.2

The root cause of this failure is identified as an inadequate Management of Change (MoC) process. **A category 3 non compliance with 1.1.1** is given due to a General Management failure (consolidated).

Action: All outstanding reports and evidence of MoC integration into the EMS must be provided to NRW by 31 January 2026.

Reporting for 2023

On 10 oct 2025, NRW received E1, PI1, WU1 for 2023.

The following reports for 2023 are currently outstanding:

- Review of the results of the monitoring and assessment for 2023 as per Condition 4.2.2(a)
- R1 for 2023 as per Condition 4.2.2(c)

CAR_NRW0048644 dated 24/6/25 included a C3 non compliances with permit condition 4.2.2.

The root cause of this failure is identified as an inadequate Management of Change (MoC) process. **A category 3 non compliance with 1.1.1** is given due to a General Management failure (consolidated).

Action: All outstanding reports and evidence of MoC integration into the EMS must be provided to NRW by 31 January 2026.

END

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.