

Compliance Assessment Report CAR_NRW0050227

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: 15/12/2025 between 12:00 and 12:45.

Parts of permit assessed: See below.

NRW Lead Officer: Philip Harper, accompanied by Carter Shone.

Report sent to: Environment Manager, Environment Manager, on 05/01/2026.

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	1.1.1a
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.3

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

Total non-compliances recorded	Total non-compliance score
2	8

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 Actions in main text.	23/01/2026
IR3B	See actions in main text.	23/01/2026

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.

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

At 12:00 on the 15th December 2025 an unannounced site inspection was undertaken by NRW officers Phil Harper, Lead Specialist Industry & Waste Regulation and Carter Shone, Senior Industry & Waste Regulation. The site was operational at the time of the inspection.

The purpose of the visit was an awareness visit for the handover of the site to a different regulatory officer.

New Chiller Plant

The operation of a new chiller unit at the site has been discussed in compliance assessment report CAR_NRW0049953 which was sent to the operator on the 2nd of December 2025.

Site operatives made officers aware that the site was waiting a noise assessment to be completed prior to submission of the variation application. NRW is of the understanding that this is to be completed imminently.

Scores were applied to this issue in the above mentioned compliance assessment report, no compliance scores have been applied in this assessment.

Action 1: Submit permit application.

IBCs Stored incorrectly

During the inspection officers noted that IBC containers were stored incorrectly on banded pallets. Containers were stacked 2 high on top of containers and some were positioned so that taps were either positioned over the edge of the bund or close enough to the edge to allow for jetting off the bund.

The storage of liquids at the site is addressed under permit condition 3.2 “Emissions of substances not controlled by emission limits” which provides the following information;

3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause

pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

3.2.2 The operator shall:

(a) if notified by Natural Resources Wales that the activities are giving rise to pollution, submit to Natural Resources Wales for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;

(b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

Whilst NRW accepts that the IBCs were stored in an area with sealed drainage to the site's effluent treatment plant, it should be noted that this is regarded as tertiary containment and not secondary containment as required by the sites environmental permit.

It should also be noted that bunds contained liquid to a point where the bund would be unlikely to contain 110 % of the primary container.

A category 3 score has been applied against permit condition 3.2.3 under subheading IR3B.

Following the visit, procedures for the storage of IBCs was requested from the operator. The operator provided the substance storage procedure which provided the following information;

2. Chemicals

Chemicals present several risks with some supporting combustion. Even if a chemical does not support combustion its interaction with fire and other substances can cause significant complications in the event of an incident.

On delivery all chemicals are to be placed immediately in their correct designated storage area. This is important as some chemicals may adversely react with others. Also, the storage areas are bunded so if any leak from a container occurs then it will be contained.

All chemicals storage areas are to be kept always locked.

During use the minimum quantity of chemical is to be taken into the factory. Any surplus that is not required must be returned to the designated store area.

The IBC chemical containers must be stored with the from valve within the bund area and not hanging over the edge. Should a leak occur, it will then still be contained.

This indicates that procedures around the storage of chemicals are not being adhered at the site, NRW views this a breach of permit condition 1.1.1a.

A category 3 score has been applied against permit condition 1.1.1a under subheading IR1A.

Action 2: Ensure that IBC containers are stored with the correct level of secondary containment by the **23rd January 2026**.

Action 3: Review bund inspection and emptying procedure to ensure that an adequate level of secondary containment is always maintained at site by the **23rd January 2026**.

Kind Regards

Phil Harper

Lead Specialist - Industry & Waste Regulation NE

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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.