

Compliance Assessment Report CAR_NRW0050682

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: 31/12/2025.

Parts of permit assessed: IR4B, IR3A, IR1A, IR3B.

NRW Lead Officer: Brigid Armstead.

Report sent to: Environment, Health and Safety Coordinator, Environment, Health and Safety Coordinator, on 13/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR4B - Installations - Information - Reporting	C3 Minor	4.2.2
IR1A - Installations - Management - General Management	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	

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
IR4B	Ensure that the following forms are submitted: performance 1,R1, Water usage 1 and Energy 1.	31/03/2026
IR1A	Action 2: All outstanding reports and evidence of MoC integration into the EMS must be provided to NRW	31/03/2026
IR3B	Princes to provide an update on the completion of the bund inspection carried out by a structural engineer.	31/03/2026
IR3B	Princes to provide a documented procedure to provide assurance that the north yard underground effluent chambers are liquid tight and resistant to inventory.	30/06/2026

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

Princes end of year CAR

Q4 2025 Emissions

Q4 Emissions monitoring results received by NRW on 14th January 2026 in compliance with permit condition 4.2.3.

Annual Reporting

Annual reporting as required under permit condition 4.2.2(b),(c) were not received by NRW by the 31st of January and remains outstanding as of the writing of this CAR (13/02/26).

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 3 minor non-compliance has been assigned due to outstanding reporting under permit condition 4.2.2 (b),(c)

Action 1: Ensure that the following forms are submitted: performance 1,R1, Water usage 1 and Energy 1. **Due 31 March 2026**

CAR NRW0049866 Reporting action:

Action 2: All outstanding reports and evidence of MoC integration into the EMS must be provided

to NRW by **31 March 2026**.

CAR NRW0046583 Containment audit:

NRW has received responses to the containment information actions set in CAR_NRW0046583 and these actions are now closed.

1: Please provide a risk assessment for the CIP tanks including bund specifications, the design standard achieved and capacity as well as a justification for the tanks overhanging the bunding. This risk assessment should be made using CIRIA 736 principles and account for catastrophic failure of primary containment and jetting.

Response: Princes have completed a risk assessment in line with the CIRIA 736 principles for the CIP Tanks and the bunded area around the tank farm. Risk assessment received by NRW.

2: Please provide verification of the integrity of the bunding for the external storage tank area and its compliance with CIRIA 736. Please confirm whether the channels in the top of the bund were taken into consideration calculating the capacity of the bund.

Response: Princes are currently in the process of approval for minor remedial works to take place and have a structural engineer to verify the bunded area. The channels have been taken into consideration, and this is reflected in the risk assessment.

3: Please provide further information as to how the North Yard underground effluent tanks are used and maintained.

Response: There is no effluent tank in the north yard, there are 3 chambers which are on a weekly inspection carried out by our utilities engineer.

4: Please provide a root cause analysis for the lack of isolation valve in the North Yard as per commitments made in the containment review 2022 (included under condition 2.3.1.)

Response: Princes has completed an RCA regarding the commitments made by previous employees of the organisation. The drain is flushed during a clean down around every 12 hours. Procedures are in place to actively avoid putting juice down the drain. North yard drainage system holds approx. 2000 ltrs. Effluent constantly running through drainage system.

Princes have advised of structural engineers being engaged to inspect the bunds as part of a wider CAPEX project within the Princes group. Implementation of Actions detailed in the Containment Risk Assessment submitted 31st July 2025 will be reviewed during the next compliance audit visit.

Action: Princes to provide an update on the completion of the bund inspection carried out by a structural engineer. **Due 31 March 2026**

CIRIA 736 page 135, Table 10.1 states that “Pipes and channels and associated gullies, chambers and manholes to be liquid tight and resistant to inventory”. Therefore, it is essential that a rigorous and routine inspection regime for such pipes, channels, associated gullies, chambers and manholes is

established and adhered to.

Action: Princes to provide a documented procedure to provide assurance that the north yard underground effluent chambers are liquid tight and resistant to inventory. **Due 30 June 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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** 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.