

## Compliance Assessment Report CAR\_NRW0050979

**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:** Report/Data Review,

**Reason:** Routine.

**On:** 31/12/2025.

**Parts of permit assessed:** Annual Returns.

**NRW Lead Officer:** Ricky Hartleb.

**Report sent to:** Head of Health, Safety & Environment, Head of Health, Safety & Environment, on 11/03/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	C3 Minor	4.2.2(a)
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.5.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
3	12

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	See actions	31/03/2026

Criteria	Action needed	Complete by
IR1A	See actions	30/04/2026
IR3E	See actions	31/03/2026

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

This Compliance Assessment Report (CAR) follows a review of the 2025 annual returns submitted by the operator.

#### **Annual Emissions Monitoring Air (Form Air1)**

The annual air emissions monitoring data for emission points A1, A2 and A10 was submitted on 4 March 2026, in accordance with Permit Condition 4.2.3 and Schedule 4, Table S4.1. However, no units of measurement were included for the monitoring results.

Emission point A1 is reported as out of service.

There are no Emission Limit Values (ELV's) for the monitored emission points.

#### **Annual Emissions Monitoring Water (Form Sewer1)**

The annual monitoring data for emission point S1 was submitted on 4 March 2026, as required by Permit Condition 4.2.3, Schedule 4, Table S4.1.

As with the air emissions, no units of measurements were included for the parameters reported.

There are no ELV's for the monitored emission points.

#### **Annual Report (Permit Condition 4.2.2)**

The annual report was received on the 4 March 2026. This is after the required reporting deadline of

31 January 2026.

NRW notes that, in response to a chase email, the operator stated that emissions testing for 2025 was completed on 19 February 2026 due to one of the boilers being out of service. Whilst NRW recognise the operator's explanation, this does not alter the reporting deadline set in the permit.

NRW would like to take this opportunity to remind the operator that emissions testing would need to be done again for 2026.

A review of the data when compared to 2024:

- Nitrogen Oxide emissions remain consistent.
- There has been a slight increase in production volume.
- For emission point S1, Chemical Oxygen Demand (COD) has slightly decreased, suspended solids have increased, and flows have increased.
- Water and energy usage have decreased.

Although all required datasets were submitted, the operator did not provide the interpretative review required under Permit Condition 4.2.2(a). This requirement was also the subject of an action in CAR NRW0046208, which has not been complied with.

This has been scored as a Category 3 breach under IR4B – Reporting.

The absence of units of measurement in the annual emissions datasets was also previously raised in CAR NRW0046206. As the operator has failed to meet this requirement, this has been scored as a Category 3 breach under IR4B – Reporting.

Because the 2024 annual report was submitted after both the statutory deadline and the previous CAR action deadline, this has also been scored as a Category 3 breach under IR4B – Reporting.

As multiple reporting requirements were not met within the same reporting period, these have been consolidated into a single Category 3 breach in accordance with NRW scoring guidance.

### **Calibration of Monitoring Equipment**

CAR NRW0049668 required the operator to arrange calibration of measuring equipment and provide the calibration records to NRW by 31 December 2025.

NRW has not received these calibration records, and therefore the action has not been complied with.

This non-compliance has been scored as a Category 3 breach under IR3E – Monitoring.

### **General Management**

Due to the number of repeated failures across different permit conditions, including reporting, data completeness, deadlines and monitoring-related actions, a further Category 3 breach has been recorded under IR1A – General Management.

This reflects deficiencies in the operator's management systems and oversight, consistent with the expectations of Permit Condition 1.1.1

**Actions**

1. For the next annual reporting, to comply with this permit condition, provide an interpretative review of the data.
2. Ensure units of measurement are included in the data submitted
3. Ensure the annual monitoring and reporting is submitted by 31st January in the future as per Permit Condition 4.2.2.
4. If not already done, arrange for the calibration of the measuring equipment and forward the records once completed to NRW by 31 March 2026.

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](mailto: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](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.