

## Compliance Assessment Report CAR\_NRW0050793

**Permit being assessed:** BV8016ID.

**For:** Kelloggs, **held by:** Kellogg Company of Great Britain Limited

**At:** Bryn Lane, Wrexham Industrial Estate, Wrexham, Wrexham, Wrexham, LL13 9UT.

**Type of assessment:** Report/Data Review,

**Reason:** Routine.

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

**Parts of permit assessed:** Annual Monitoring Report.

**NRW Lead Officer:** Hannah Ibbotson.

**Report sent to:** EHS Practitioner, EHS Practitioner, 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
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.5.1
IR4B - Installations - Information - Reporting	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
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
IR3E	Action: Ensure all monitoring is completed as specified in the permit. Operator to carry out and provide the missing monitoring data for 2025 during the first quarter of 2026.	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 the review of the 2025 annual monitoring and returns data. This data was submitted to Natural Resources Wales (NRW) on 28/01/26 and is within the timescales specified in the permit.

With reference to form A1, air emission monitoring results for emission points A1-A4 (Oxides of Nitrogen) and emission points A18-A22 (Sulphur) were provided as specified by the permit. There are no Emission Limit Values (ELVs) associated with these emission points.

Air emission monitoring results for emission points A26-A31 (Total Particulates) were provided. These recorded values between 0.33mg/m<sup>3</sup> - 2.5mg/m<sup>3</sup> vs a permitted ELV of 50mg/m<sup>3</sup>. All results were compliant with the permitted ELV.

Air emission monitoring results for emission points A32-A34 (Total Particulates) were not provided as required by the permit specified in condition 3.5.1. The operator reported to NRW in January 2026 that the monitoring data for these emissions points had not been completed for the following reasons:

Emission points A31-A34 were booked in for September 2025 but the relevant processes were not running so the monitoring was not able to be completed. Process 4 (linked to A32-A34) was shut for the majority of the 2nd half of 2025 to complete required modifications.

NRW considers this a breach of permit condition 3.5.1 (IR3E - Emissions and Monitoring) and a C3 non-compliance score has been applied.

**Action:** Ensure all monitoring is completed as specified in the permit. Operator to carry out and provide the missing monitoring data for 2025 during the first quarter of 2026.

The test method used was in accordance with BS EN13284-1 and MID which complies with the monitoring standard/ method specified in the permit.

With reference to form PI1, data for Annual Production/ Treatment has been provided. Total site production for 2025 was 45,927 tonnes. Chemical Oxygen Demand (COD) release per tonne of product was 0.00030 and energy use per tonne of product was 1.60 Mwh/tonne of product. Refrigerant use was listed as 55.9 kg/year, an increase compared to 0kg refrigerant used in 2024.

With reference to form R1, Total Waste produced in 2025 (9624 tonnes) was higher than Total Waste produced in 2024 (7383 tonnes).

With reference to form E1, Primary Energy Usage (MWh) was lower in 2025 (73,676 MWh) compared to 2024 (118,610 MWh). Total CO2 produced in 2025 (20,487 tonnes) was also lower compared to 2024 (21,451 tonnes).

With reference to form WU1, total water use in 2025 was 167,845 M3. This was higher than total water use in 2024 (157,974 M3).

With reference to form S2, emissions to sewer from emission point S1 recorded the following values: Chemical Oxygen Demand (COD)- 13.3 Tonnes/ Year, Suspended Solids – 3.4 Tonnes/ Year.

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.