

Compliance Assessment Report CAR_NRW0051015

Permit being assessed: AB3591ZQ.

For: Maelor Foods Limited, **held by:** Maelor Foods Limited

At: Maelor Foods Limited, Pickhill Lane, Cross Lanes, Wrexham, Wrexham, LL13 0UE.

Type of assessment: Site Inspection,

Reason: Incident Response (Incident number 2602240).

On: 11/03/2026 between 14:30 and 15:30.

Parts of permit assessed: see below.

NRW Lead Officer: Libby Hughes, accompanied by Ricky Hartleb, Hannah Ibbotson.

Report sent to: Environmental Manager , Environmental Manager, on 26/03/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3C - Installations - Emissions and monitoring - Odour	C3 Minor	3.3.3(b)
IR1A - Installations - Management - General Management	C3 Minor	1.1.1(a)

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
IR3C	See Action 3 below	15/04/2026
IR1A	See Actions 1, 2 & 3 below.	15/04/2026

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) form has been produced following an odour incident being reported to Natural Resources Wales (NRW), and a visit to site to discuss the subsequent investigation.

WIRS Incident 2602240

NRW received an odour report of "overwhelming, putrid smell" coming from the site on 6th March 2026 at 23:20. The site was notified immediately by NRW's ICC Incident Communication Centre (ICC), and an internal odour investigation was carried out by staff at Maelor Foods Ltd. A report was forwarded to NRW on 9th March 2026 which included:

"Between approximately 23:00 and 00:30 there was an increased level of activity associated with the exchange of CAT (Category waste) trailers on site. During this period multiple trailers were present simultaneously to facilitate the exchange of full trailers with empty units. These movements were concentrated in the same area on the northern side of the site. Due to limited manoeuvring space and trailer turning radius near the weighbridge area, the exchange process took slightly longer than usual. As a result, 3 trailers were temporarily active in close proximity. The temporary concentration of trailers and movements within this confined area created a short period where odour associated with Category waste handling was noticeable locally.

Although the event appears to have been limited to a short period associated with trailer exchange activity, Maelor Foods will take additional steps to minimise the likelihood of a similar situation occurring again.

The third-party responsible for the collection and exchange of Category waste trailers will be formally contacted to ensure that site exchange procedures are carried out as efficiently as possible and that trailer handling practices minimise the potential for temporary odour release.

The matter will also be communicated to the site management team so that operational staff remain aware of the importance of odour control during Category waste handling activities. Communication on the use of odour neutralising agents and maintaining strict odour management practices during trailer exchange periods will be done."

The Daily Environmental Check Sheet completed immediately following the odour report states that no odour was noticed near the offal doors at 00:48, but that the offal doors were open and that uncovered dolavs were present near the offal bays.

NRW feels that admission of an issue with the management of an on-site odorous activity at the same time that the odour report was received by NRW is sufficient to substantiate the odour report WIRS 2602240 on this occasion. However officers did not attend at the time of the odour report, so are unable to substantiate whether or not there was a discernible off-site odour.

Site Inspection 11.03.2026

An unannounced site inspection was carried out on 11th March to discuss the reported incident. Discussions were held around the importance of the third party involved in removal of ABPs to be involved in onsite odour minimisation through the following:

1. If there are potentially too many lorries on-site at any time it is the responsibility of Maelor Foods security team to temporarily restrict access to site
2. It was alleged that on occasion the lorries or skips removing the waste are dirty and odorous when arriving on-site. The third party operator is responsible for ensuring that their lorries / skips etc are clean and odour free when entering site. Maelor Foods environmental managers should discuss this issue with the third party operators and insist that they improve their operations

Action 1: Provide NRW with a copy of the correspondence with the third party clarifying their need to improve operations to support Maelor Foods compliance with permit conditions by 15th April 2026.

Action 2: Provide NRW with updated site operations to the site management team showing amendments to restrict lorry flow on-site at busy times by 15th April 2026

During the inspection an uncovered dolav full of carcasses was spotted near the offal bay.



Section 5.9 of Appendix 5, which was submitted to NRW in May 2023 in support of the latest permit variation states that:

"The animal by-products (ABP) ... will be held in the existing ABP storage building which can accommodate sufficient trailers **to ensure ABPs are always stored inside and collected in a timely manner**....The ABP building is large enough to accommodate the collection vehicles and the trailers are sheeted up inside before being driven out "

Action 3: Improve operations to ensure that all ABPs are stored under cover in compliance with Maelor Foods Ltd operating techniques by 15th April 2026..

- submit photographs to NRW to demonstrate compliance.
- Improve training to staff to remind them that ABPs must not be stored outside.

It should be noted that there was no associated discernible odour at the time of the inspection, however it is considered that in this matter Maelor Foods Ltd is not operating in compliance with the permit. As a result a category C3 non-compliance has been scored against IR3C (Odour) for a breach of permit condition 3.3.3(b):

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

NRW views that failure to comply with the odour management plan is a breach against permit condition 1.1.1a. The odour management plan forms part of the overarching Environmental Management System. A further category C3 non-compliance has been

recorded against IR1A General Management - Permit condition 1.1.1a.

If you have any issues or concerns with anything in this CAR form please don't hesitate to contact your Industry Regulation officer.

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.