

Compliance Assessment Report CAR_NRW0052208

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: 12/06/2026 between 14:40 and 15:05.

Parts of permit assessed: See below.

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

Report sent to: Environmental Manager, Environmental Manager, on 08/07/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.3
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	3.2.1
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.1
IR2B - Installations - Operations - The site	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
4	16

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
IR3B	See main text	24/07/2026
IR1A	See main text	24/07/2026
IR3B	See main text	24/07/2026
IR3B	See Main Text	24/07/2026
IR2B	Provide updates regarding the roof work and confirm if birds have returned to the nest	24/07/2026

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.

At this time, we do not intend to take any further action.

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) has been raised following an unannounced inspection of the 2 Sisters Sandycroft site on the 12 June.

NRW Officers were accompanied throughout the site by the Environmental Manager and Maintenance Manager.

Monitoring Data - Effluent Treatment Plant

Permit condition 3.5.3 required the operator to maintain an MCERTs accredited/certified self-monitoring effluent flow scheme.

During previous inspections, it was identified that the flow meter was not MCERTS certified. An action was issued in CAR_NRW0048570 requiring certification on the meter. This was subsequently followed up in CAR_NRW0050796 with a completion date of 31 August 2026.

The operator confirmed that the flow meter was certified on 11 June 2026. During the site inspection, NRW officers verified the certification and are satisfied that the action have been completed

Birds on site

On 1 May 2026, the operator notified NRW that, during roof replacement works, bird nests containing eggs were discovered within the work area. The operator immediately ceased work and sought advice on how to proceed.

The operator was referred to NRW's Species Team, which is responsible for issuing licences relating to the removal of bird nests on 12 June 2026. During the site inspection, NRW officers visited the affected building and confirmed that no roofing works were taking place.

On 30 June 2026 the operator contacted NRW to advise that the birds had fledged the nest on the

roof and requested to recommence the works, this was approved as long as the site is completely satisfied that the birds have genuinely fledged the nest.

Action: Provide updates regarding the roof work and confirm if birds have returned to the nest

Incorrect Storage of IBCs

CAR_NRW0050227 identified that IBCs were being stored two-high on a bund with insufficient capacity and that taps were overhanging the bund area. An action was set requiring the storage arrangements to be rectified by 23 January 2026.

During this site inspection, the IBCs were still being stored on the same bund and remained double-stacked. The operator advised that new bunding is scheduled for delivery in July 2026.

NRW considers this a breach of permit conditions 1.1.1a and 3.2.3, as this non-compliance was previously identified and remains unresolved. The recurrences of the same issue indicates the management systems have not been effective in delivering the required corrective action.

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

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

Action: Confirm that the IBCs are being stored in accordance with permit requirements and that the action has been completed by 24 July 2026.

F-gas Refrigerant

Since January 2026, the operator has reported three refrigerant leak incidents.

The first incident was addressed in CAR_NRW0050610.

The second incident, reported on 11 March 2026, involved the loss of approximately 660 kg of refrigerant. The leak was traced to copper pipework within an Air Handling Unit where vibration had caused the pipes to rub together. The leak was isolated immediately and repaired by a certified engineer. The pipework has since been separated to prevent recurrence. The operator also advised that they are obtaining quotations for a replacement refrigeration system.

The third incident, reported on 26 June 2026, involved the loss of approximately 165 kg of refrigerant following the failure of a pressure relief valve on the main plant receiver. The valve was replaced immediately. The operator advised that pressure relief valves are replaced every five years as part of the site's preventative maintenance programme. The failed valve had last been replaced on 19 December 2025.

A Category 3 non-compliance score has been applied for both incidents against permit condition 3.2.1 under sub-heading IR3B – Emissions of substances not controlled by emission limits

Action: Provide an update on quotations for a replacement refrigeration system by 24 July 2026.

WIRs received April – June 2026

Between April and June 2026, NRW received 21 WIRS relating to the 2 Sisters Sandycroft site:

- 18 odour complaints;
- 2 complaints relating to an incident outside the site entrance; and
- 1 noise complaint.

Off-site odour investigations were undertaken on 29 May, 12 June and 26 June 2026.

29 May 2026

No site-related odours were identified around the site or within the surrounding area. A live bird delivery was observed during the inspection, and no associated odours were detected.

At the rear of the site, a waste odour was detected on the boundary shared with Allan Morris Recycling.

12 June 2026 – Site Inspection

No site-related odours were identified around the site or at the site entrance.

During the inspection, no operational practices were observed that were likely to result in off-site odour impacts. In addition, the operator has introduced odour treatment of dolavs containing carcasses to further reduce odour generation.

26 June 2026

Following an odour complaint received on the morning of 26 June 2026, an NRW officer undertook an off-site odour assessment at 13:20. No odours attributable to the site were identified around the site boundary.

The findings of NRW's investigations are consistent with those reported by the operator following each WIRS received during this reporting period.

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.