

Compliance Assessment Report CAR_NRW0052012

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: Audit,

Reason: Routine.

On: 28/05/2026 between 10:00 and 15:00.

Parts of permit assessed: IR3E.

NRW Lead Officer: Brigid Armstead, accompanied by Richard Taylor.

Report sent to: Environment, Health and Safety Coordinator, Environment, Health and Safety Coordinator, on 03/07/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Action only (X)	
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.5.3
IR1A - Installations - Management - General Management	C3 Minor	1.1.1

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
IR1A	Ensure that all advisories detailed in the OMA report are addressed.	31/12/2026

Criteria	Action needed	Complete by
IR3E	Provide documented evidence of the analytical methods used for pH, SS and COD, including confirmation of compliance with recognised standards. Provide a copy of the Cd and Hg mass balance calculation spreadsheet for 2023-2025 and a copy of the procedure for calculation.	31/08/2026
IR3E	Provide an MCERTS site conformity certificate to NRW.	31/10/2026
IR1A	Provide a risk assessment and implement a plan to ensure that any flow through the overflow inlet is monitored and recorded.	31/10/2026

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

An Operator Monitoring Assessment (OMA) was carried out at Princes Soft Drinks site in Cardiff with the site visit on 27th May 2026.

Overall, the site achieves a moderate level of compliance, with sound technical systems in place but had some key governance and assurance weaknesses. To improve performance, the operator should prioritise:

- Strengthening and formalising monitoring procedures within the EMS
- Improving verification of methods, laboratory accreditation, and data quality
- Implementing robust contingency and breakdown response procedures
- Addressing identified compliance risks (overflow monitoring and MCERTS certification)
- Expanding audit coverage and quality assurance processes

Addressing these issues will improve confidence in monitoring data, ensure permit compliance, and reduce environmental risk.

Advisory actions are set in the report where improvements can be made.

Action 1: ensure that all advisories detailed in the OMA report are addressed.

Some permit non compliances were identified in sections 2C, 3A and 4A. Further details on

these non compliances and corrective actions follow:

2C Measurement methods and standards

The Permit allows the site to use the water company monitoring results for pH, SS, COD. Sampling is undertaken by the water company on a monthly unannounced basis. Sample analysis methods used are not being monitored and are not reported by DCWW. Princes take their own sample for pH and COD at the same time for internal use.

Cd and Hg concentrations are based on mass balance calculation. A spreadsheet of caustic input is used to calculate outputs.

Action 2: Provide documented evidence of the analytical methods used for pH, SS and COD, including confirmation of compliance with recognised standards. Provide a copy of the Cd and Hg mass balance calculation spreadsheet for 2023-2025 and a copy of the procedure for calculation.

3A Continuous Monitoring

MCERTS site conformity certification was not provided for the flow meter. To gain CSA certification, the operator or MCERTS inspector must apply to Sira Certification Service with the MCERTS inspection report and Quality Management System (QMS) report for an MCERTS Site Conformity Inspection Certificate, valid for 5 years. Further information can be found on at www.mcerts.net.

A category 3 non compliance against permit condition 3.5.3 has been raised due to the lack of an MCERTS Site Conformity Inspection certificate.

Action 3: Provide an MCERTS site conformity certificate to NRW. **Due 31 October 2026.**

The flow meter is installed below an overflow inlet which was reported to NRW as being seen to be in flow in 2023. The overflow inlet derives from the chamber 2 which is prior to the monitoring chamber. Chamber 2 would overflow to the monitoring chamber if the flow metered inlet was blocked.

There is a risk of unmonitored discharge via the overflow inlet, as no monitoring is in place to capture flows entering the monitoring chamber through this route.

The operator should consider the use of high level alarms, standby pumps, emergency storage and tankering contingency plans to ensure that all flow is accounted for.

Permit condition 1.1.1.(a) requires the operator to manage and operate the activities in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations...

A category 3 non compliance is raised against permit condition 1.1.1 due to the risk of pollution through excess flow to sewer not being managed.

Action 4: Provide a risk assessment and implement a plan to ensure that any flow through the overflow inlet is monitored and recorded. **Due 31 October 2026**

4A Quality Assurance

Effluent quality samples sent off site should be analysed by a laboratory with UKAS/ MCERTS accreditation for all parameters. This could not be verified during the audit as the operator does not have a procedure for reviewing analysis standard compliance.

Action 5: Provide NRW with laboratory reports which demonstrate UKAS/ MCERTS accreditation for all determinants.

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.