

Compliance Assessment Report CAR_NRW0052281

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: Other,

Reason: Incident Response (Incident number 2606070).

On: 06/07/2026.

Parts of permit assessed: see below.

NRW Lead Officer: Libby Hughes.

Report sent to: HSE Manager, Environment Officer, on 29/07/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3D - Installations - Emissions and monitoring - Noise and vibration	C3 Minor	3.4.1
IR3C - Installations - Emissions and monitoring - Odour	C3 Minor	3.3.3(b)
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR1A - Installations - Management - General Management	Action only (X)	

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
IR3D	See Action 1 below	31/07/2026
IR3C	See Action 2 below	Already completed

Criteria	Action needed	Complete by
IR1A	See Actions 3 and 4 below	04/08/2026
IR1A	See Actions 5 and 6 below	30/09/2026

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 Appraisal Report (CAR) form has been prepared following the receipt of several odour and noise complaints by NRW, and corresponding visits to site by NRW officers. These have coincided with a prolonged spell of hot, dry weather.

Saturday 6th June WIRS 2606070 and 2606071

NRW received two reports concerning odour and noise during the evening of Saturday 6th June.

An investigation subsequently carried out into the odour reports by the operator found that there had been logistical issues involving the scheduled collection of a CAT3 animal by-product (ABP) trailer on the Saturday afternoon. The contractors refused to remove the trailer from site over concerns that it had been overfilled. Security failed to successfully escalate the issue to management in a timely manner. The trailer remained outside for several hours until Management were contacted by NRW. Subsequently arrangements were made for the trailer to be moved back inside the building **which benefits from a negative pressure environment with foul air management**. The operator also stated that external doors had been left open which had further compromised **air management**. The operator confirmed that **doors had been closed** and the odour abatement scrubber system **was working as normal**.

The investigation report found that petrol-powered equipment was being used for outside cleaning late at night. **The operator went on to state that "In future equipment of this kind will not be used outside after 9pm. Late evening clean-downs will use internal electrical systems or non-powered hoses"**.

External doors being left open is likely to have contributed to off-site Noise.

ACTION 1: Review and if necessary update the Noise Management Plan in light of the

issues highlighted above.

The Odour Management Plan (OMP) has identified that there is a moderate to high risk of odour attached to poor management of ABPs especially during periods of hot weather. The OMP states that ABPs must be contained within the enclosed building with sufficient air extraction to the chemical scrubber system. **A non-compliance with permit condition 3.3.3(b) has resulted in a C3 score against Compliance Criteria IR3C above.**

ACTION 2: Review and update the Odour Management Plan. Submit a copy to NRW by Friday 7th August 2026

ACTION 3: Review and update the escalation route for site staff to contact senior management during out of hours incidents. Provide NRW with an updated version by 7th August 2026. See the General Management section below for further information and for scoring.

Friday 26th June WIRS 2606815 and 2606819

Two further incidents were reported to NRW on Friday 26th June at around 18:00. The reports described odour and noise issues coming from the installation. The reports also stated that odour and noise had been notable all day, and had already been reported to site earlier in the day.

The reports likened the noise to as an "aeroplane-like" whirring noise. Site operatives carried out an investigation and turned off the Effluent Treatment Plant (ETP) scrubber earlier than usual as a precaution. It was later confirmed by a reporter that both odour and noise were no longer notable.

The investigation report subsequently received by NRW confirmed that no issues, faults, or abnormal activities were recorded as having occurred on-site on Friday 26th, and that multiple odour rounds had been carried out on-site.

On this occasion the investigation was unable to identify any on-site issues which may have caused the reported odour, however, on the 26th June the installation was upwind of the reported location. Temperatures on 26th June were around 25C

Monday 6th July

NRW officers carried out an odour round of the area surrounding the factory, but were unable to identify any off-site odours which could be attributed to Maelor Foods Ltd. This was followed by an unannounced site visit. The site was very clean and tidy. Some improvement works were being carried out around the effluent treatment plant which restricted the use of forklift trucks around the site. Smaller uncovered dolavs were being used to collect the initial screened material from the collection sump at the top of the works; officers were told that these were being removed and replaced far more frequently than

usual to minimise odours. The emergency pits were empty, clean and dry.

The ETP scrubber was inspected. The operator confirmed that the weekly change of the scrubber liquor had taken place on 24th June. The sludge trailer and screw press were inspected, both appeared to be working normally and officers confirmed that odours were contained within the buildings.

It was noted that the unfilled offal trailers were now being parked in the south western corner of the site, outside the Lloyd Fraser building, and further away from the nearest sensitive receptors; this change was instigated by the operator to further reduce the possibility of odorous trailers causing odour issues off-site.

Friday 10th July WIRS 2607421

The operator contacted NRW at about 17:00 to notify of an incident which had occurred earlier in the day involving a CAT3 trailer leaking onto the road leading from the factory. The operator had already actioned a clean-up and had contacted WCBC who sent out a road sweeper to complete the clean-up. The operator had also contacted the contractors to notify them of the incident and investigate why their trailer was leaking.

Later the same evening NRW received **WIRS 2607421** reporting odour and the earlier trailer leak. The wind direction at the time was consistent with the installation being the source of odour, however, this was not assessed by NRW officers. Ambient temperatures were 27-30C during the day.

WIRS 2607451 and WIRS 2607536

Two further incidents were reported to NRW which link back to the incident on Friday 10th July:

WIRS 2607451 was received by NRW on the evening of Saturday 11th July advising of odour, again the wind direction at the time was consistent with reported odour potentially coming from Maelor Foods.

The operator's investigation highlighted that the odour complaints coincided with the movement of CAT3 trailers on and off site.

WIRS 2607421 was received by NRW on Tuesday 14th July, reporting the earlier incident of 10th July.

The operator did not provide any further investigation into this as they were unable to add to the incident investigation already carried out on 10th July.

Friday 17th July

NRW officers carried out a further odour round, followed by an unannounced visit to site. No off-site odours were noted during the odour round. Onsite the offal bay doors were all open as maintenance was occurring at the time. NRW has not received a SCHEDULE 5 concerning this activity. While odour could be detected right next to the trailers, no odour was detectable 10m away. All works which had been observed at the ETP during the visit on Monday 6th July had been completed, and the usual containers were in use for the screened material. There was some raw effluent in the emergency pits due to a blockage which had been identified in the sump. This was already in the process of being drawn down and pumped back round to the start of the works.

The empty ABP trailers had been relocated again, to now be kept inside the empty Howard Fraser building. One of the empty trailers had been identified by site operatives as being odorous, and had been rejected. During the officers' visit this was observed being removed from site by the contractor for enhanced deep cleaning.

General Management

The root cause for many of the odour reports issued appear to be related to management and movement of the ABPs on and off-site at weekends when fewer management staff are around.

ACTION 4: Review the on-site management during evenings and weekends. Identify which staff are in control of the site at these times. Ensure that they have sufficient training to make the necessary decisions when incidents occur out of hours.

Climate Change

The root cause for many of the odour reports issued appear to be related to management and movement of the ABPs on and off-site at weekends when fewer management staff are around. Several of the incidents covered in this CAR form relate to a prolonged heatwave which may have exacerbated the issue. Periods of high ambient air conditions are likely to increase in intensity and frequency due to Climate Change. The Operator should consider how the installation adapts to prevent future temperature exceedances.

ACTION 5: Review and update if necessary the EMS relating to the management of ABPs. Provide NRW with an up to date copy of this document.

ACTION 6: Consider and if necessary review the Climate Change Risk Assessment in light of the above incidents. Provide NRW with an up to date copy of this document.

Actions 3, 4, 5 and 6 above show that the site is not being adequately managed in compliance with permit condition 1.1.1. during evenings and weekends. **A further C3 non-compliance score has been applied against Compliance Criteria IR1A - General Management**

A further visit to site by NRW officers is planned for next week. Any actions arising from this will be covered in a future CAR form.

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.