

Compliance Assessment Report CAR_NRW0052783

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: 26/08/2026 between 10:45 and 11:40.

Parts of permit assessed: various.

NRW Lead Officer: Rebecca Harwood.

Report sent to: Environmental Manager, Environmental Manager, on 28/08/2026.

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	C3 Minor	1.1.1
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR3C - Installations - Emissions and monitoring - Odour	C3 Minor	3.3.1

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
IR1A	see text below	02/09/2026
IR1A	see text below	02/09/2026
IR3C	see text below	02/09/2026

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 Assessment Report follows an unannounced inspection of the installation on 26/08/2026 following a spate of recent odour complaints.

Prior to the inspection, an off-site odour monitoring round was conducted. A strong offal odour was detected along Rectors Lane, from the junction of Rectors Lane and Chester Road, towards the far end of Rectors Lane, including at the junction with Church View and at the entrance to Morgans.

Condition 3.3.1 states *Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.*

A site inspection was completed following the detection of off-site odour. The regulatory officer was accompanied by the Environmental Manager and Health & Safety Manager.

During the site inspection the Effluent Treatment Plant was discharging. Although a slight odour was detected at the inspection chamber when opened, this did not appear to be the source of the off-site odour. The inspection pit was being cleaned at the time of the inspection and a layer of debris was noted on the outflow. The Engineering Manager later stated that this was a fatty / foaming residue that would flow through. The regulatory officer subsequently contacted Dŵr Cymru Welsh Water who stated that it was related to the foam discharges from the flocculant used within the DAF.

The blood tank was being emptied at the time of the visit. There was a strong transient and intermittent odour in the ABP rear yard, however, this did not appear to be the source of the off-site odour picked up earlier. The tanker was attached to the scrubber unit as per the Odour Management Plan (OMP).

Action 1: Provide paperwork that demonstrates when the blood tanker arrived and left site on 26/08/2026 by 02/09/2026.

There was a full, covered offal trailer at the rear of the yard. This had been pulled out of the gantry at 09:51 on 26/08/2026 and was waiting to be removed off site.

Action 2: Provide paperwork indicating when this load left site by 02/09/2026.

Lids were on the CAT 3 dolavs by the offal gantry. It was noted whilst in the rear yard area that there was offal and feathers on the ground, both adjacent to and under the parked trailer. On review of CCTV it could be seen that the dolavs were washed down but the area was not cleaned afterwards. The Operators document YAR001 Yard and Roadway Cleaning Procedure states *"To remove, brush and hose down the area around the offal trailers, ensuring that no debris remains on the ground. Daily, or as required if more frequent cleaning is required."* and *"Check that the grids covering drains are free from debris and gullies are flowing freely."* **This has been scored a category 3 breach of condition 1.1.1 for not following procedures (compliance criteria (IR1A) General Management).**

Whilst reviewing the trailer movements over the previous 24 hours on CCTV, it was observed that a half full offal trailer had been left uncovered between 14:11 and 17:16 on 25/08/2026. The trailer left site at 18:30. The OMP states *"The trailers are regularly changed and not permitted to stand on site. They are sheeted over once pulled out of the bay to leave site."* **This has been scored a category 3 breach of condition 1.1.1 for not following procedures (compliance criteria (IR1A) General Management).**

Action 3: Ensure all staff are trained and follow procedures to minimise and reduce off site odour. Records may be checked on a future inspection.

The Operator confirmed that CAT2 waste is now collected 5 times a week.

There were two full carcass trailers to the front of the site that were awaiting removal. These had been moved to this location earlier that morning.

Action 4: Confirm when the carcass trailers were removed from the carcass shed and provide paperwork demonstrating when they left site by 02/09/2026.

The off-site offal odour is likely attributable to residual offal on the ground, the management of ABP trailers and cleaning activities within the rear yard. **The offsite odour has been scored a category 3 breach of condition 3.3.1 (compliance criteria (IR3C) Odour).**

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.