

Compliance Assessment Report CAR_NRW0046228

Permit being assessed: BL5644IK.

For: Sensient Flavors Ltd, **held by:** Sensient Flavors Ltd

At: Sensient Flavours, Felinfach, Lampeter, Ceredigion, SA48 8AG.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: Q3 & Q4 2024 Monitoring Submission.

NRW Lead Officer: Elliot Jones.

Report sent to: Jonathan Heard, Operations Manager, on 12/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.1
IR4B - Installations - Information - Reporting	C3 Minor	4.2.2
IR4B - Installations - Information - Reporting	C3 Minor	4.2.3
IR4C - Installations - Information - Notification	Assessed (A)	

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
IR3B	Implement appropriate control measures to prevent fugitive release of powder emissions.	Already completed

Criteria	Action needed	Complete by
IR4B	Submit Annual reports for review.	14/03/2025
IR4B	Ensure monitoring submissions are reported within 28 days of the end of the reporting period	28/07/2025

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

Sensient Flavors Limited

Sensient Flavors Limited operates in accordance with EPR/BL5644IK

The Sensient Flavors produces food flavourings from the hydrolysis of vegetable matter, this is a chemical process where hydrochloric acid is added to ingredients using heat and pressure. Process then converts vegetable protein to more flavoursome hydrolysed vegetable proteins. Additional processes include colouring, flavour, and the form of the flavouring.

The site consists of a medium combustion plant, effluent plant, process scrubbing units and a raw material storage area.

Purpose of Compliance Assessment

The following monitoring returns and report have been assessed within this Compliance Assessment Report (CAR):

- Quarter 3 (Q3) July – September 2024 Monitoring Returns, Emissions to Air.
- Quarter 3 2024 Schedule 5 Notification
- Quarter 4 (Q4) October – December 2024 Monitoring Returns, Emissions to Air.
- Annual Production & Performance Parameters 2024

Compliance Assessment

Quarterly monitored parameters are reported biannually. Monitoring returns received by NRW officer on the 4th February 2024. Monitoring returns received outside the 28 days reporting period stated in clause 4.2.3 of the environmental permit.

In accordance with non-compliance scoring guidelines a non-compliance score of **C3** has been allocated against sub-criteria **IR4B Reporting**.

Action: Ensure monitoring submissions are reported within 28 days of the end of the reporting period.

Quarter 3 2024 Emissions to Air Monitoring Returns

Operator has submitted the relevant results for all parameters required over this period, this includes parameters monitored both quarterly and biannually. Monitoring results have been assessed and are compliant with those stated in Schedule 3 Table S3.1 with no breaches of emission limit values.

Quarter 3 2024 Schedule 5 Notification

Operator submitted a Schedule 5 notification following fugitive emission release morning of the 30th August 2024.

Schedule 5 received by NRW officer via email on the 30th August 2024. Notification received by NRW officer in a timely manner, compliant with permit condition 4.3.1.

A fugitive emissions release to atmosphere occurred when replenishing the wet dust extraction system with clean water. Replenishing the extraction system is part of the sites daily check procedure.

When replenishing the dust extraction system, scrubber unit functions below its maximum capacity for an estimated period of 15minutes. During this period, a fugitive emission release occurred.

The emission release coincided with an offsite odour complaint from a member of the local community. (WIRS Report 2412057)

In accordance with non-compliance scoring guidelines, a non-compliance score of **C3** has been allocated against criteria **IR3B – Emissions of substances not controlled by emission limits**.

Action: Implement appropriate controls to prevent release of powder emissions. Implement controls measure into written maintenance procedures.

Following the incident, maintenance on the wet dust extractor is only to be undertaken while powder blend is not in operation, reducing the likely hood of any fugitive emission releases in the future.

Quarter 4 2024 Emissions to Air Monitoring Returns

Operator has submitted the relevant results for all parameters required over this period, this includes parameters monitored both quarterly and biannually. Monitoring results have been assessed and are compliant with those stated in Schedule 3 Table S3.1 with no breaches of emission limit values.

Annual Production & Annual Performance Parameters

Operator has failed to issue the annual report outlining production and performance parameters stated in Schedule 4 Table S4.2 and S4.3.

Performance reports have not been submitted within the required 31-day reporting period stated in clause 4.2.2 of the environmental permit.

In accordance with non-compliance scoring guidelines a non-compliance score of **C3** has been allocated against sub-criteria **IR4B Reporting**

Action: Submit Annual reports for review.

This CAR report and assessment was undertaken on 12th February 2025. However, to ensure that the CCS score is attributed to the correct financial year (for billing) the date on CARS system has been altered to 31st Dec 2024.

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 only relating to the activity assessment
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 – Emissions to water, air or 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.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at 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.