

Compliance Assessment Report CAR_NRW0046422

Permit being assessed: AP3433ES.

For: Dowlais Slaughterhouse EPR/AP3433ES, **held by:** Kepak Group Limited

At: Pengarnddu Industrial Estate Dowlais Top , Merthyr Tydfil, South Wales, CF48 2TA.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: Annual Returns.

NRW Lead Officer: Brigid Armstead.

Report sent to: Megan Lewis, Environmental Coordinator, on 24/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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?

No action required.

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

Kepak Quarterly Returns and Annual Report 2024

Reporting as per Condition 4.1.2

The parameters listed in Table S2 of the permit were sent to NRW as per 4.1.2(a).

Reporting of parameters in Table S2 was submitted on the forms specified in Table S3 as per 4.1.2(b).

Emissions

Q1, Q2, Q3 and Q4 2024 emissions was reported for monitoring reports for W1 & W2 and S1 and are compliant with the permit condition 6.3.2 and 6.4.2 emission limits.

Annual organophosphorus compounds results for 2024 received in line with permit requirements.

Energy and water consumption 2024

NRW received form R1 from Kepak on 30th January 2025.

The site used 18,516 MWh of delivered electricity and 48,142 MWh of Primary electricity in 2024.

The site used 16,865 MWh of delivered gas and 187,571 m³ of process water in 2024.

Electricity usage increased, while gas and water consumption decreased in 2024 from 2023.

Waste

NRW received form R2 from Kepak on 30th January 2025.

In 2024 the majority of waste was either recycled, sent to an anaerobic digester or for rendering. Total waste was 44,979.851 tonnes, with 146.28 tonnes (0.3%) being sent to landfill. This is a slight increase in the percentage sent to landfill.

Advisory: Kepak are advised to ensure that waste to landfill is minimised and that the waste hierarchy is considered throughout the business operations.

Packaging waste data is reported in mid march.

Fugitive emissions report

There were no reportable spillages on site during 2024. Spill kits are strategically placed around the exterior of the site, near to the storage of chemicals and oils, and near vulnerable receptors.

EMS improvement report

Kepak has corporate and site EMS targets. Kepak has reduced the use of water and energy per tonne of product over in 2024 when compared to 2023. However, the energy used per tonne of product was greater in 2024 than 2022. Kepak have stated that energy and water consumption will continue to be prioritised in 2025.

The table below shows the sites results over the last few years.

Environmental Objective	2021	2022	2023	2024
Compliance				
Environmental Permit Banding 50% A/B 0% E	D	E	B	B
Environmental Complaints Reduction in Complaints	18	4	0	1
Reportable Environmental Incidents Reduce and Eliminate	6	2	0	2
External Environmental Non-Compliances Reduce and Eliminate	26	17	9	15
Energy and Water				
Water use per tonne of production Reduce water usage by 2% (m³/MT) by 2023	2.16	2.21	2.46	1.87
Energy use per tonne of production Reduce energy usage by 2% (kWh/MT)	660.09	597.3	662.45	603.57
Waste				
Landfill Zero to Landfill	Not achieved	Not achieved	Not achieved	Not achieved
Recycling Increase recycling per tonne of production by 2% (kg/MT)	0.45kg/MT	1kg/MT	1.34kg/MT	1.42kg/MT

Waste Disposal

The site continues to send contaminated plastics to landfill, due to contractor restrictions. Kepak are

exploring ways in which blood contaminated products can be treated prior to collection to avoid landfill.

Projects completed and ongoing:

There are a number of projects that are either ongoing or have been completed in 2024. These include:

- Flow and pressure of the water supply to knife sterilisers in both slaughter halls were reduced, the most inefficient sterilisers were replaced, and pipework was repaired.
- The site invested in an electric steriliser
- All nozzles on hand sinks and apron washers were replaced in both slaughter halls with low-flow nozzles.
- Process review in the gut and tripe rooms.
- Trial of new cleaning equipment, including spray bars and modified floor cleaners.
- Investing in a better monitoring system for water and energy users on site
- Investment in new balers for clean plastics and cardboard

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.