

Compliance Assessment Report CAR_NRW0048321

Permit being assessed: BU8002IT.

For: Cross Hands Meat Processing Plant, **held by:** Dunbia UK

At: Cross Hands Business Park West , Cross Hands, Cross Hands, Carmarthenshire, SA14 6RF.

Type of assessment: Site Inspection,

Reason: Routine.

On: 07/05/2025 between 09:30 and 12:00.

Parts of permit assessed: Management, Operations, Emissions and monitoring, Information.

NRW Lead Officer: Alex Bowder, accompanied by Daren Pike.

Report sent to: Dunbia (UK), HSE Officer, Environmental Manager, on 16/05/2025.

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	Assessed (A)	
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR2C - Installations - Operations - Operating techniques	Assessed (A)	
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR3D - Installations - Emissions and monitoring - Noise and vibration	Assessed (A)	
IR3F - Installations - Emissions and monitoring - Pests	Assessed (A)	
IR4A - Installations - Information - Records	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

This Compliance Assessment Report (CAR) details the comments of Natural Resources Wales (NRW) Officers for the site inspection conducted on 7 May 2025 at Cross Hands Meat Processing Plant, Cross Hands Business Park West, Cross Hands, SA14 6RF for activities undertaken by Dunbia (UK) (the operator) under the environmental permit EPR-BU8002IT.

Inspection commentary

The visit purpose was to conduct a general inspection of permitted activities in the compliance year 2024/25. There were no permit condition non-compliance scores recorded.

In November 2024, the operator's permit was varied (EPR/BU8002IT/V008) to update the registered address.

Attendees

- Alex Bowder - Senior Regulation Officer, NRW
- Daren Pike - Senior Regulation Officer, NRW
- HSE Manager, Dunbia
- Environmental Manager, Dunbia
- Site Engineering Manager, Dunbia
- Site Director, Dunbia

At 9:30am NRW officers arrived at the site's security station and parked in the designated visitor area. Officers signed in and were met by Dunbia staff in the office where introductions began. The operator briefly spoke about staff changes before commencing a walkaround the outside of the yard, looking at the various process activities. This included the: (i) drainage systems, (ii) waste storage areas, (iii) effluent treatment, (iv) refrigeration, and (v) rear of site. This was followed by a tour of process within the food preparation hall areas.

Site drainage

Since last NRW visit in 2024, the operator has installed new drainage channels in the yard fitted with gully system where lines were upgraded to improve flow efficiency. Maintenance of drainage openings and channels are managed by in-house engineering. There were no issues noted with the drainage network at the time of inspection.

Emission points

The W2 discharge point to water is checked for blockages on a weekly basis. A document was produced by the operator demonstrating checks taking place at the penstock, which was signed and dated by staff. Parts of compliance monitoring is conducted by the in-house facilities team. Further compliance work with regard to environmental management is conducted in-line with wider ISO 140001 standards.

Stack emission testing is carried out annually by a contractor. The smoker stack emission point is tested annually in accordance with MCERTS requirements. Efficiency testing was also confirmed to be carried out for gas emissions into the atmosphere to ensure environmental standards are met. There were redundant, empty CO₂ cylinders on site ready for decommissioning and collection by the manufacturer.

Advice has been provided to the operator independently of this report with regard to the use of onsite generators going forward.

W5 Sampling point

In March 2024, an incident occurred involving vehicle contact with the gas housing station. Following this, the operator has installed concrete blocks in the area to act as a physical barrier to the gas station to prevent reoccurrence. No further events of this nature have taken place.

Effluent Treatment Plant (ETP)

Officers inspected the site's effluent treatment area. This area is afforded with suitable impermeable surface which is fenced-off from the neighbouring work areas. The operator has recently changed the disposal destination of its solid screenings and sludge material. Materials are now taken offsite for anaerobic digestion at appropriate facilities and are collected by waste contractors on a weekly and monthly basis. It was mentioned how this activity change should not impact permit conditions or require a variation.



Image 1 – showing waste solid screenings in ETP in a container

All dosing chemicals used in process were provided with suitable secondary containment bunding, with spill kits located nearby. There were no issues apparent with storage vessels or plant at the time of inspection. Tamper tags were also present on spill kits for ease of auditing to ensure

supplies are fully stocked.

Officers briefly discussed the site's Odour Management Plan (OMP). There have been no amenity reports received for the facility to NRW or Carmarthenshire County Borough Council.

Ammonia emissions

Officers raised the compliance issue surrounding the site's historic exceedance of the permitted ammonia limit (ELV of 0.25 mg/l) to discharge point W2. The site drainage channels and roof areas are cleaned periodically to remove build-up of algae and leaves, which is believed to be a contributing factor.

Leakage from the compactor has also been highlighted as a contributing factor. This has been addressed by upgrading the PortaPacker equipment to avoid potential liquid seepage when the skips are disconnected. The operator has since replaced the flexible pipe connector to a solid type, which reduces the risk of leakage when disconnecting the unit.



Image 2 – showing the PortaPacker unit fitted with a solid connector pipe at the base

Preparation hall

Officers were shown the various process lines, packaging mechanisms, cooking elements, and ingredient rooms inside the facility. All plant washdown goes through the drains to ETP. The operator has recently added shelf-stacking to rooms for improved storage functionality. There were no compliance issues observed with permitted activities during the inspection.

Officers concluded the site tour and inspection in the meeting room. Left site at 12:00.

Alex Bowder

Senior Officer - Southwest Wales Industry Regulation

Alex.Bowder@cyfoethnaturiolcymru.gov.uk

END OF REPORT

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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.