

Compliance Assessment Report CAR_NRW0048657

Permit being assessed: CB3091HY.

For: Llangadog Pet Foods Plant, **held by:** United Petfood UK Limited

At: Tywi Valley Food Park, Station Road, Llangadog, SA19 9LY.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 30/04/2025.

Parts of permit assessed: See Section 4 .

NRW Lead Officer: Benjamin Taylor.

Report sent to: Compliance Manager , United Petfoods (UK) Ltd , on 27/06/2025.

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	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C2 Significant	Permit condition 3.1.2.
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	Permit condition 3.5.1a.
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	Permit condition 3.5.1a.
IR4B - Installations - Information - Reporting	Action only (X)	
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	39

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	Operator should lock valves associated with pipes and tanks when not in use in order to prevent any future accidental or unauthorised activation.	27/06/2025
IR1A	Operator must ensure there are sufficient routine maintenance/inspection systems in place for ETP components in order to maintain functionality. Records of these activities and subsequent actions must be kept and readily available upon request by NRW.	28/10/2025
IR3A(1)	The Operator is to take the necessary steps to ensure they remain within compliance levels (with exception to extreme weather events resulting in flooding) for Maximum Daily Discharge Volume (MDDV) or is to vary their permit to increase the permitted level for MDDV following assessment (and approval) by NRW's Permitting Team.	28/10/2025
IR3E	The Operator is to confirm to NRW whether the autosampler has been commissioned by Aquatreat, or is to provide a suitable date that the monitoring asset will be operational. Once the autosampler is operational then United Petfoods (UK) Ltd is to monitor in accordance with permit condition 3.5.1a.	04/07/2025
IR3E	Operator is to consult with external laboratory to ensure that Total Nitrogen in its entirety (and all other parameters specified within Schedule 3b: Table S3.2 of the permit) are included within the routine analysis suite.	Already completed
IR4B	Operator is to ensure that they submit their Quarterly Monitoring Reports by the deadline specified within the EPR permit.	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

Introduction

This Compliance Assessment Report (CAR) is an assessment of monitoring data and associated Schedule 5 Notifications submitted by United Petfoods UK Ltd (the Operator), during the Quarter 1 (Q1): January to March reporting period.

Scope

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

- UPF Reporting CB3091HY Q1 01.01.25 to 30.03.25.
- Schedule 5: Notifications.

Quarter 1 2025 Monitoring Review – Emissions to Water

The installation currently has one permitted discharge point to controlled waters, referenced S1 within Schedule 7 of the permit.

The returns for reporting of sampling and analysis of emissions to water (other than sewer) for the period Q1 2025 were submitted on the 30th of April 2025.

This was outside the timeframe (within 28 days) specified by the EPR permit, and as a result is considered contrary to permit condition 4.2.3.

Action:

Operator is to ensure that they submit their Quarterly Monitoring Reports by the deadline specified within the EPR permit.

Maximum Permitted Discharge

Throughout the duration of Q1 monitoring period, there has been a reported total of fifteen exceedances of the permitted Maximum Daily Discharge Volume (1000m³). These are outlined within Table 1 below.

Date	Time	Parameter	Measured Value
January			
06/01/2025	23.57	Maximum Daily Discharge Volume	1733.35m ³
07/01/2025	23:59	Maximum Daily Discharge Volume	1166.42m ³
16/01/2025	23.57	Maximum Daily Discharge Volume	1078.17m ³
28/01/2025	23.59	Maximum Daily Discharge Volume	1103.83m ³
February			

05/02/2025	23:57	Maximum Daily Discharge Volume	1086.88m ³
06/02/2025	23:57	Maximum Daily Discharge Volume	1091.33m ³
19/02/2025	23:57	Maximum Daily Discharge Volume	1047.18m ³
20/02/2025	23:57	Maximum Daily Discharge Volume	1678.78m ³
25/02/2025	23:58	Maximum Daily Discharge Volume	1456.06m ³
26/02/2025	23:58	Maximum Daily Discharge Volume	1008.64m ³
March			
05/03/2025	23.57	Maximum Daily Discharge Volume	1046.33m ³
06/03/2025	23.57	Maximum Daily Discharge Volume	1141.26m ³
13/03/2025	23.57	Maximum Daily Discharge Volume	1005.44m ³
18/03/2025	23.57	Maximum Daily Discharge Volume	1206.85m ³
20/03/2025	23.57	Maximum Daily Discharge Volume	1123.00m ³

Table 1: List of exceedances of Maximum Daily Discharge Volume noted throughout Q1 2025

The Operator has a history of repeated exceedances of their permitted Maximum Daily Discharge Volume (MDDV). This is the result of combined drainage infrastructure which channels surface water, treated effluent and process water through the MCERTS flow meter prior to discharge into controlled waters. Furthermore, there is also the addition of abstracted borehole water and excess retort water (from the heat transfer system associated with the cooking process) that contributes to the final discharged volume. NRW were informed on the 3rd of February 2025 that the excess retort water had been re-routed to the start of the ETP process in order to reduce requirements for additional borehole water utilised for temperature control. However, a Schedule 5 Notification submission (5th & 6th of March 2025) illustrated that the retort water had been returned to the end of the process following failure of the underground pipework.

The Operator has attributed a number of the exceedances of MDDV to the contribution of rainfall, including the Afon Bran/Afon Tywi breaching its banks during a period of heavy rainfall recorded on the 6th of January 2025. The Operator has also offered the following alternative causes associated with the exceedances illustrated below:

- 16th of January 2025
 - Contact Tank drained to facilitate the servicing of the probes.
- 5th of February 2025
 - Accidental activation of the clean water valve during cleaning of the V-Notch Chamber by ETP Operative.

- **Action:**
 - **Operator should lock valves associated with pipes and tanks when not in use in order to prevent any future accidental or unauthorised activation.**
- 6th of February 2025
 - Fault with the outlet pump associated with the V-Notch Chamber resulting in a backflow of water through the flow meter.
- 19th of February 2025
 - Failure of pipework (resulting in a leak) associated with the Water Feeder Tank.
- 25th of February 2025
 - Fault with underground drainage pumps following heavy rainfall (23rd of February 2025) which resulted in an accumulation of rainfall to build up within the drainage infrastructure. Exceedance following manual release of accumulated water from LUBEK Tank.
- 5th and 6th of March 2025
 - Failure of underground pipework associated with the excess retort water into the ETP.
- 13th of March 2025
 - Continued diversion of excess retort water into the V-Notch Chamber.
- 18th and 20th of March 2025
 - Retort has been cooling product to a lower temperature resulting in an increased usage (and subsequent discharge) of water.
 - Continued diversion of excess retort water into the V-Notch Chamber.

On review of alternative causes illustrated above, NRW considers there to be the indication of potential maintenance issues i.e. multiple pump/pipework failures which ultimately resulted in exceedances of a listed compliance limit within *Schedule 3b: Table S3.2*. It is also important to highlight that there has been an additional failure of the pH probe associated with the DAF Plant (resulting in an exceedance of BOD on the 2nd of April 2025) which falls within the Q2 reporting period and subsequently will be discussed within a later CAR. General management relating to maintenance of the ETP has not been compliance assessed at this time, this is due to it being subject to a later CAR which will be issued in due course.

Action:

Operator must ensure there are sufficient routine maintenance/inspection systems in place for ETP components in order to maintain functionality. Records of these activities and subsequent actions must be kept and readily available upon request by NRW.

Schedule 3b: Table S3.2 of the permit, which covers point source emissions to water specifies that:

Maximum daily discharge volume shall not exceed:
1000 m³/day

Permit condition 3.1.2 below states:

'The limits given in schedule 3 shall not be exceeded.'

Compliance:

United Petfoods (UK) Ltd has consistently failed to keep within the limits listed within *Schedule 3b: Table S3.2* and subsequently is contrary to permit condition 3.1.2. As a result, a non-compliance score of C2 has been attributed to IR3A(1) – Emissions to Water for the aforementioned exceedances.

In accordance with non-compliance scoring guidelines, the non-compliance scores for the breaches during Q1 2025 reporting period have been consolidated into one non-compliance score.

Action:

The Operator is to take the necessary steps to ensure they remain within compliance levels (with exception to extreme weather events resulting in flooding) for Maximum Daily Discharge Volume (MDDV) or is to vary their permit to increase the permitted level for MDDV following assessment (and approval) by NRW's Permitting Team.

Schedule 5 Notifications

The Operator submitted ten Schedule 5 Notifications throughout Q1 2025, which related to fifteen exceedances of the MDDV (treated effluent) limits at emission point S1 to the Afon Tywi.

The Operator submitted these Schedule 5 Notifications using the correct form and within the required timeframe as specified by permit condition 4.3.2.

General – Monitoring Regime

Methodology and Frequency

The Operator remains unable to undertake the required monitoring for a number of parameters (listed below) as specified within *Schedule 3b Table S3.2*.

- Biological Oxygen Demand (BOD).
- Total Phosphorus.
- Total Suspended Solids.
- Chemical Oxygen Demand (COD).
- Total Nitrogen (changed from Ammoniacal Nitrogen).
- Chloride.

This is a requirement of permit condition 3.5.1a, which is stated below:

‘The operator shall, unless otherwise agreed in writing by Natural Resources Wales, undertake the monitoring specified in the following tables in schedule 3 to this permit:

(a) point source emissions specified in tables S3.1 and S3.2. ’

Monitoring requirements are outlined within BAT Conclusion 4 of the Food, Drink and Milk Industries BRef Document (EU 2019). As a result, the Operator should be collecting a 24-hour flow proportional composite sample every day (with the exception of BOD, which should be collected on a monthly basis) or at a frequency agreed in writing with NRW. Currently the Operator does not have the equipment necessary to undertake this specified monitoring and as a result, is continuing to collect instantaneous spot samples.

During an unannounced site inspection which was undertaken on the 20th of May 2025, NRW Officers noted that the required autosamplers were present onsite, however were yet to be commissioned by Aquatreat. The Operator informed NRW that they were in dialogue with the Aquatreat in order to schedule the commissioning works.

Compliance:

United Petfoods (UK) Ltd has failed to monitor i.e. frequency and methodology as is specified within *Schedule 3(b): Table S3.2* and subsequently is contravening permit condition 3.5.1a. As a result, a non-compliance score of C3 has been allocated against non-compliance criterion of IR3A –

Monitoring.**Action:**

The Operator is to confirm to NRW whether the autosampler has been commissioned by Aquatreat, or is to provide a suitable date that the monitoring asset will be operational. Once the autosampler is operational then United Petfoods (UK) Ltd is to monitor in accordance with permit condition 3.5.1a.

Parameters – Total Nitrogen (TN)

Lab analysis certificates which detailed weekly samples collected by the Operator were submitted to NRW on the 23rd of April 2025. On review of these submissions, they appeared indicate that the Operator was failing to monitor for Total Nitrogen in its entirety, and subsequently was contravening permit condition 3.5.1a.

The definition of Total Nitrogen (TN) as specified within *Monitoring of Emissions to Air and Water from IED Installations* REF Document is:

‘Total nitrogen, expressed as N, includes free ammonia and ammonium (NH₄-N), nitrite (NO₂-N), nitrate (NO₃-N) and organic nitrogen compounds’

The submitted external lab analysis certificates illustrated only Ammonia (as NH₄) and Nitrate (as NO₃) as being tested with other parameters listed within the definition above being noted as absent.

On the 23rd of May 2025 the Operator provided Lab Certificates (*Cert. 9686 United Pet Foods*) from their External Lab which evidenced that Total Nitrogen was now included within their routine sampling suite.

Compliance:

United Petfoods (UK) Ltd has failed to monitor for all parameters as is specified within Schedule 3(b): Table S3.2 and subsequently is contravening permit condition 3.5.1a. As a result, a non-compliance score of C3 has been allocated against non-compliance criterion of IR3A – Monitoring..

Action:

Operator is to consult with external laboratory to ensure that Total Nitrogen in its entirety (and all other parameters specified within *Schedule 3b: Table S3.2* of the

permit) are included within the routine analysis suite (already completed).

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.