

Compliance Assessment Report for: CAR_NRW0048882

Permit number	CB3091HY	Operator name	United Petfoods (UK) Ltd
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Site name	Llangadog Pet Foods Plant.
Site address	Tywi Valley Food Park, Station Road, Llangadog, SA19 9LY.
Type of assessment	Site Inspection

Date of assessment	20/05/2025	Time in	09:50	Time out	12:45
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Parts of permit assessed	See Section 4.
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NRW Lead officer	Benjamin Taylor	Accompanied by	Rhodri Morgan
Report sent to – Name and position	Compliance Manager, United Petfoods (UK) Ltd	Date	21/07/2025

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
IR1A - Management - General management	C2 Significant	Permit condition 1.1.1.
IR3A - Emission & Monitoring - Emissions to water, air or land	C2 Significant	Permit condition 3.1.1.
IR3B - Emission and Monitoring - Emissions of substances not controlled by emission limits	C2 Significant	Permit condition 3.2.3.

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

Total number of non-compliances recorded	Total non-compliance score
3	93

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?

Compliance Criteria	Action needed	Complete by
IR1A	<u>CAR NRW0048882.A1</u> United Petfoods (UK) Ltd is to undertake an urgent review of their maintenance procedures and implement any improvements in immediate effect. An outcome of this review (detailing the improvements made) will need to be submitted to NRW as evidence (this action supersedes the IR1A action detailed within CAR_NRW0048657).	29/08/2025
IR3A	<u>CAR NRW0045004.A3</u> Operator is to vary the permit to incorporate the additional discharge point to controlled waters into the permit.	Overdue (previous CAR action)
	<u>CAR NRW0048882.A2</u> United Petfoods (UK) Ltd is to identify all outfalls on the site and where the operator is claiming they are redundant they are to provide evidence to confirm this. The operator must also permanently seal all redundant drainage outfalls entering the Afon Bran using a suitable sealing material. The operator must submit evidence to NRW once this has been completed.	17/10/2025
	<u>CAR NRW0048882.A3</u> United Petfoods (UK) Ltd is to undertake emergency repairs on all failures that are resulting in the unauthorised release of process water to land and controlled waters. Evidence must be submitted to NRW once completed (partially complete).	01/08/2025
IR3B	<u>CAR NRW0048882.A4</u> United Petfoods (UK) Ltd is to submit to NRW an inventory of all liquid bearing tanks and assets (including redundant) that are present onsite. The submitted inventory is to include key information such as the tanks works area location, construction material, volume and nature of contents.	15/08/2025
	<u>CAR NRW0048882.A5</u> United Petfoods (UK) Ltd is to undertake a structural assessment of all ETP assets using a suitably competent contractor in order to ascertain the condition and integrity	30/09/2025

Compliance Criteria	Action needed	Complete by
	of all effluent bearing vessels and transfer systems. The conclusions of this assessment is then to be submitted to NRW.	
	<u>CAR NRW0048882.A6</u> United Petfoods (UK) Ltd is to undertake a secondary containment assessment (in line with CIRIA 736) using a competent third-party contractor for all tanks, sumps, bunds, pipes and containers. Upon completion, this report is to be submitted to NRW as evidence.	31/01/2026
	<u>CAR NRW0048882.A7</u> United Petfoods (UK) Ltd is to investigate the structural integrity of the Detritus Pit and Reception Pit. All internal structural walls and components associated with the assets must be cleaned and foreign material removed to facilitate a full inspection by a suitably competent contractor, a report will need to be generated and is to be submitted to NRW as evidence.	31/10/2025

Action 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 prosecutions 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

On the 20th of May 2025, Natural Resources Wales (NRW) Officers conducted a Site Inspection on United Petfood (UK) Ltd (the Operator) at their Llangadog Site.

Scope

The inspection was unannounced, the purpose of which was to undertake assurance water sampling, to locate and inspect the outfall associated with the unpermitted drainage line^[1] and finally to ascertain the secondary containment measures associated with the Effluent Treatment Plant (ETP).

The assurance water sampling locations were pre-determined, however collection was dictated by weather conditions at the time and observations made by NRW Officers whilst onsite. Water samples were collected from the following locations during the 20th of May 2025 inspection:

- Permitted Outfall (S1).
- V-Notch Chamber.
- Failed Retort Pipework.

Site Observations

S1 Outfall



Image 1: S1 Outfall into Afon Tywi

Prior to attending Site, NRW Officers visited the permitted outfall (S1) into the Afon Tywi in order to collect a water sample whilst also facilitating the inspection of the immediate vicinity surrounding the discharge point. It was noted that the treated effluent appeared to

¹ Previously discussed within CAR_NRW0045004 dated 24th of July 2024.

be visually clean, with no discolouration or significant odours detected at the time of the inspection. The immediate area surrounding the outfall appeared to be in an acceptable condition from a visual perspective with only minor green algal growth noted as present on the rocky surface beneath the pipe outlet (illustrated within *Image 1* above).

Autosamplers

NRW Officers then attended Site at 10:40am where they were met by a representative of United Petfoods (UK) Ltd. Upon arrival at the ETP, it was noted that the autosamplers^[2] whilst present onsite, were not yet operational. NRW were informed during the visit that the Operator was in dialogue with their contractor (Aquatreat) in order to schedule the commissioning of these assets.

On the 7th of July 2025, the Operator informed NRW that the autosampler had been commissioned by Aquatreat and was in operation.

Un-permitted Outfall

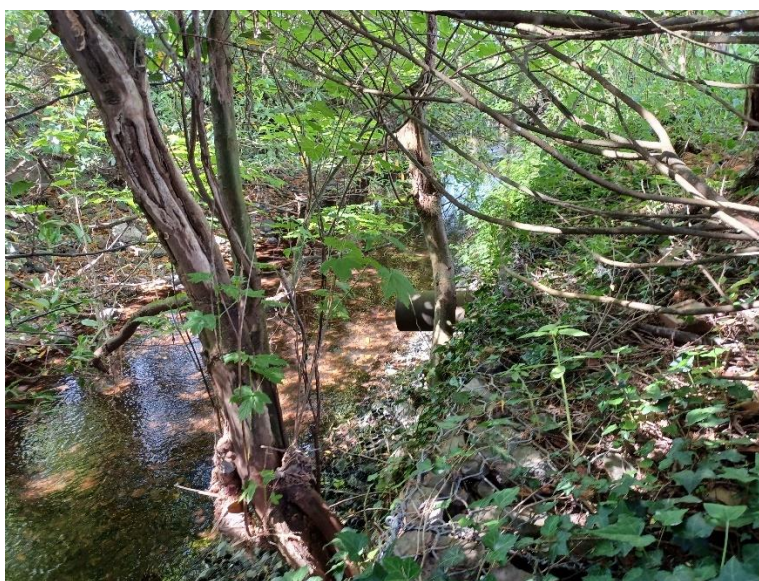


Image 2: Outfall associated with the unpermitted discharge believed to be from the western warehouses.

NRW Officers requested to be guided to the un-permitted outfall into the Afon Bran (which is a tributary to the Afon Tywi) to facilitate its inspection, whilst also determining the exact point of entry to controlled waters. Based on the operator's current drainage plan^[3], it is the understanding of NRW that this outfall receives surface water generated from the western warehouses. There was no discharge or significant odours noted from the outfall at the time of the inspection, which was expected given the prolonged period of dry weather

² Required to undertake monitoring in line with Schedule 3(b): Table S3.2 of EPR permit and also for routine wastewater characterisation associated with Improvement Condition (IC) 1.

³ Site plans drainage CAD file and Permit map document submitted on 27th of August 2024.

leading up to the inspection day. NRW has already informed United Petfoods (UK) Ltd that a permit variation is required to incorporate this new (un-permitted) emission point into their EPR permit. The operator was instructed to submit this application in a previous CAR⁴ form. The operator has failed to comply with this action and it is now overdue. The Operator must seek to incorporate this outfall into their EPR permit with the utmost urgency. The Operator should be minded that addition of this outfall into the permit is not guaranteed and ultimately is at the discretion of NRW's Permitting Team. Furthermore, the Operator must ensure that the drainage plan is referred to prior to any developments/alterations to the site drainage within this area that may result in contaminated water being inadvertently discharged into the Afon Bran. NRW was made aware during previous visits that there are alterations being made to the road layout of the Site which will result in changes being made to the drainage infrastructure, the drainage plan must be amended and updated so that it accurately reflects the drainage infrastructure upon completion of these works. During the inspection, there were a number of additional outfalls noted as entering Afon Bran along the banking, whilst these may be redundant, they do pose a potential pathway for rapid migration into controlled waters and must be sealed off to minimise any risk.

Action:

United Petfoods (UK) Ltd is to identify all outfalls on the site and where the operator is claiming they are redundant they are to provide evidence to confirm this. The operator must also permanently seal all redundant drainage outfalls entering the Afon Bran using a suitable sealing material. The operator must submit evidence to NRW once this has been completed.

Secondary Containment

Images 3 & 4: Permeable ground surrounding LUBEK Tank (left) and Rotary Filter Bed (right)

⁴ CAR_NRW0045004 dated 24th of July 2024.

It is important to highlight, that there are a number of legacy ETP assets that were associated with the former Creamery which previously operated onsite. Some of these were noted as still holding potentially polluting liquid. During the visit, the Operator clearly outlined to NRW which of these assets were currently operational within their ETP process. NRW is aware that the Settlement Towers, which are part of their permitted ETP process have been non-operational since April 2024. We have not compliance assessed this aspect as part of this inspection and this will be considered as part of a future inspection. NRW Officers noted that the ETP assets were predominantly of concrete construction, a brief visual inspection of the tanks, structures and transfer systems indicted degradation of the concrete surface consistent with exposure and weathering.

Action:

United Petfoods (UK) Ltd is to submit to NRW an inventory of all liquid bearing tanks and assets (including redundant) that are present onsite. The submitted inventory is to include key information such as the tanks works area location, construction material, volume and nature of contents.

Action:

United Petfoods (UK) Ltd is to undertake a structural assessment of all ETP assets using a suitably competent contractor in order to ascertain the condition and integrity of all effluent bearing vessels and transfer systems. The conclusions of this assessment is then to be submitted to NRW.

NRW Officers identified that a number of ETP assets were currently not benefitting from any form of secondary containment. Furthermore, those that had a form of containment in place (e.g. DAF Plant) were not considered in-line with CIRIA C736^[5] and as a result, were deemed as insufficient. NRW Officers expressed concern during the visit that above ground pipework between the Detritus Pit and ETP is routed over the Afon Bran presenting a clear risk of direct entry to controlled waters in the event of pipework failure. The Operator informed NRW that the pipework is visually inspected on a routine basis by onsite ETP Operatives. Pipework must be provided with appropriate containment provisions.

Permit condition 3.2.3 below stipulates:

“All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.”

⁵ Containment systems for the prevention of pollution Secondary, tertiary and other measures for industrial and commercial premises

Concern over the perceived lack of secondary containment is further exacerbated by the presence of permeable ground throughout large portions of the ETP Works Area i.e. surrounding the LUBEK and Rotary Filter Bed. This permeable ground is considered a vulnerability, acting as a potential pathway which would allow for rapid of migration of contaminants into the soil matrix/groundwater. Furthermore, the close proximity of the ETP Works Area to Afon Bran^[6] presents a sufficient risk of contaminant entry in the event of containment failure either directly via above ground surface flow or indirectly via groundwater throughflow.

Compliance:

The ETP assets and pipework noted during this inspection (which contain potentially polluting liquids) did not have adequate secondary containment in place. This is contrary to permit condition 3.2.3 of the EPR permit. Based on the condition and number of assets at the ETP, their proximity to highly sensitive environmental receptors and the polluting nature of the effluents, we consider that a containment failure has the potential to cause a significant environmental impact. As a result, a non-compliance score of C2 has been allocated to this failure, against this compliance criteria (IR3B).

Action:

United Petfoods (UK) Ltd is to undertake a secondary containment assessment (in line with CIRIA 736) using a competent third-party contractor for all tanks, sumps, bunds, pipes and containers. Upon completion, this report is to be submitted to NRW as evidence.

⁶ feeds into the Special Area of Conservation (SAC) Designated Afon Tywi.

Un-authorised Discharges

During the visit, NRW Officers observed four losses of containment that ultimately resulted in the unauthorised release of process water to ground and controlled waters. These were predominately observed within the curtilage of the ETP Works Area.



Image 5: Loss of containment from failed Retort Water Pipework into the Afon Bran

NRW were already aware via a Schedule 5 Notification^[7] of the failure of underground pipework associated with the retort water overflow. In response to this incident the Operator had diverted this flow back into the V-Notch Chamber, which acts as a form of dilution. NRW Officers observed the excavated area and noted a minor discharge into the Afon Bran from the failed joint associated with the retort pipework, the Operator assured NRW that the pipework has been isolated and guided Officers to the upstream activation lever; which was confirmed to be in the 'off' position. As a result, the minor flow may be attributed to minor losses through the mechanism associated with the upstream valve. The Operator outlined to NRW that the retort water is clean water from their heat transfer system and as a result the only property that has been altered is its temperature. While temperature does have a polluting potential, it was not considered that temperature of the lost water was high enough to the touch to be of significant concern. NRW Officers collected a water sample directly from the failed pipework for compliance assurance, the results of the analysis undertaken illustrated no elevated figures for tested parameters.

⁷ Schedule 5 Notification 05.03.25 & 06.03.25 CB3091HY submitted by the Operator on the 12th of March 2025.

The Operator informed NRW that the failed retort pipework was due for repair by third-party contractors on the day following the visit. Subsequent to this visit the operator provided photographs indicating the pipework was repaired on the 23rd of May 2025.



Image 6: Discharge of partially treated effluent to ground from pipework associated with Final Clarifiers

NRW Officers observed a loss from pipework associated with the Final Clarifiers of the effluent treatment process. Due to the lack of a secondary containment and situation of permeable ground, any losses (such as the one observed) are considered to be to ground with potential to impact the soil matrix and associated groundwater. NRW Officers noted discolouration of the partially treated effluent lost from the Clarifiers from a visual inspection, however a water sample was not collected at the time. NRW Officers also noted a further leakage from a failed welded joint associated with one of the Final Clarifier assets. The Operator informed NRW that this asset has required repeated repair works in order to maintain its functionality, this brings into question the suitability of this asset within the ETP process and a replacement may be required.



Images 7 & 8: Structural failure of transfer flume associated with the ETP (left) and evidence of loss of containment (right)

During the visit, NRW were informed that ETP Operatives clean and visually inspect the flume condition on a weekly basis^[8], and any issues identified would be reported to management. A partial and brief inspection of the flume by NRW Officers identified a significant structural failure of the concrete flume associated with the ETP, and whilst there is evidence that the Operator has attempted to seal the failure, NRW Officers observed a constant uncontrolled release of effluent to permeable ground. Furthermore, it is considered that the substantial vegetation growth within this area compared to other areas of the ETP is indicative that this loss may have been occurring over a prolonged period of time. It was noted by NRW Officers that the concrete within the immediate vicinity of the failure was degraded, with a slight swaying movement of the impacted section possible when touched. There were concerns that there is a viable risk of a structural failure in this area which would result in the release of contaminated water to ground in potentially very large quantities if not identified quickly by onsite staff. The Operator subsequently provided photographic evidence on the 23rd of May 2025 that a patch repair has been undertaken on the failure to prevent any further losses. While this action is acknowledged, NRW is uncertain of the integrity of this repair and how effective it is at preventing the further release of effluent to ground. Currently, NRW does not consider this patch repair to a permanent solution and further improvements into the integrity of the flume (and associated ETP components) must be investigated and proposed to NRW.

⁸ Typically on Monday's following the weekend shutdown.

Permit condition 3.1.1 specifies:

‘There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1 and S3.2.’

Compliance:

As discussed earlier within the CAR, the secondary containment measures at the ETP Works Area are either deficient or absent. As a result, these observed emissions of potentially polluting liquids from ETP assets have resulted in unauthorised discharges to both ground and controlled waters. NRW considers this to be a contravention of permit condition 3.1.1. A non-compliance score of C2 has been attributed to this failure, against this compliance criteria (IR3A).

Action:

United Petfoods (UK) Ltd is to undertake emergency repairs on all failures that are resulting in the unauthorised release of process water to land and controlled waters. Evidence must be submitted to NRW once completed (partially complete).

NRW considers the above contravention to be indicative of in-adequate and maintenance being undertaken at the site. These failures have ultimately resulted in the deterioration of assets followed by the observed leaks polluting liquids to ground.

Additionally, NRW feels it's pertinent to highlight that the Settlement Towers^[9] were taken out of operation in April 2024 due to deficiencies in the maintenance which led to operational issues and safety concerns. Furthermore, within the Quarter 1 (Jan to Mar) 2025 Monitoring Returns submitted by the operator, NRW has noted that a number of exceedances of Maximum Daily Discharge Volume (MDDV) compliance limits have been attributed to the failure of pumps, alarms, probes and pipework associated with the ETP.

While NRW has been informed that Weekly Inspections have been undertaken on the flume, there has been no evidence i.e. written records submitted to NRW that details the scope, frequency and completion of these inspections.

Compliance:

The extensive failures to implement adequate maintenance of ETP assets is considered to be a contravention of permit condition 1.1.1. Given the extent and nature of the maintenance deficiencies noted a non-compliance score of C2 has been attributed to this failure, against this compliance criteria (IR1A).

⁹ Subject of an alternative CAR.

Action:

United Petfoods (UK) Ltd is to undertake an urgent review of their maintenance procedures and implement any improvements in immediate effect. An outcome of this review (detailing the improvements made) will need to be submitted to NRW as evidence.

Detritus Pit and Reception Pit



Image 9 & 10: From surface view of Reception Pit (left) and Detritus Pit (right)

During the visit, NRW Officers visually inspected from the Reception Pit and Detritus Pit which are associated with the ETP process from ground level. The Detritus Pit, which receives all wastewater from Site activities was noted as being in a particularly poor condition from a visual perspective, with a significant accumulation of foreign solid material present upon the effluent surface. It is unclear from on-site discussions with the representative of United Petfoods (UK) Ltd whether an integrity inspection has ever been undertaken on either the Detritus Pit and Reception Pit, or when they had been emptied previously. The internal structural walls of the Detritus Pit appeared to be of concrete construction above the material 'crust' of the effluent residue and this is presumed to be the case throughout the entirety of the asset. Concerns were raised regarding the potential presence of structural failures beneath the water line which may allow for the escape of contaminated liquid to ground in the absence of periodic integrity inspections and routine maintenance. The levels within the Detritus Pit are managed via an automatically activated pumping system which transfers effluent via above ground pipework across the Afon Bran and into the Reception Pit.

The Reception Pit appears to be acting as a balance tank within the effluent treatment process, with continual circulation through the system to maintain aeration and prevent settlement. While the condition of this asset appeared to be better from a visual perspective, evidence of fat deposits surrounding upper walls of the asset are indicative of

historic instances of effluent overflow. NRW were informed that the Reception Pit was significant in depth with majority of its structure being subterranean.

Action:

United Petfoods (UK) Ltd is to investigate the structural integrity of the Detritus Pit and Reception Pit. All internal structural walls and components associated with the assets must be cleaned and foreign material removed to facilitate a full inspection by a suitably competent contractor, a report will need to be generated and is to be submitted to NRW as evidence.

NRW Sampling - Results

The assurance water samples^[10] that were collected by NRW Officers on the 20th of May 2025 were tested for the permitted parameters listed within *Schedule 3(b) – Table S3.2* of the EPR Permit.

All results from our samples were compliant with any respective EPR compliance limits (for all of the parameters analysed).

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

¹⁰ S1 and V-Notch samples were split in attendance of United Petfoods (UK) Ltd, with one of each of their choosing provided should they have wished to undertake their own sampling analysis.

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 in the aspects assessed.
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

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 – 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.