

Compliance Assessment Report CAR_NRW0049071

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: 07/07/2025.

Parts of permit assessed: See Section 4.

NRW Lead Officer: Benjamin Taylor.

Report sent to: Compliance Manager , United Petfoods (UK) Ltd, on 08/08/2025.

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	C3 Minor	Permit condition 3.1.2.
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor (Suspended)	Permit condition 3.5.1a.
IR4B - Installations - Information - Reporting	Assessed (A)	
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
2	4

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
IR3A(1)	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 (action is ongoing from	29/08/2025

Criteria	Action needed	Complete by
	CAR_NRW0048882).	
IR3E	United Petfoods (UK) Ltd is to ensure they are compliant with permit condition 3.5.1a by monitoring in accordance with the methodology/frequency that is listed within Schedule 3(b): Table S3.2.	28/10/2025

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 2 (Q2): April to June reporting period.

Scope

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

- UPF Reporting CB3091HY Q2 01.04.25 to 30.06.25.
- Schedule 5: Notifications.
 - Schedule 5 Notification for BOD 02.04.25 CB3091HY

Quarter 2 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.

United Petfoods (UK) Ltd submitted their Q2 monitoring data on the 7th of July 2025. This was noted as within the timeframe (of 28 days) as is specified by 4.2.3 of the EPR permit.

Biological Oxygen Demand (BOD)

On the 2nd of April 2025, there was a reported exceedance of permitted BOD levels which are outlined within *Schedule 3(b): Table S3.2*. This exceedance also coincided with a complaint of an odorous discharge from the permitted outfall (S1) associated with the installation from a member of the public.

Date	Parameter	Measured Value	Emission Limit Value (ELV)
02/04/2025	Biological Oxygen Demand (BOD)	42.7mg/l	40mg/l

Table 1: List of BOD exceedances for Q2 2025 at S1

United Petfoods (UK) Ltd have attributed this exceedance to a fault with a pH probe associated with the DAF Plant. This pH probe fault impacted the DAF Plant's flocking process, which subsequently resulted in inefficiencies in regards to the removal of organic matter from the flow. The faulty pH probe was replaced by a third-party contractor.

In response to the above failure, United Petfoods (UK) Ltd have reviewed their current procedures (SOP-ENV-01) around pH measurement on the DAF Plant. NRW were informed that this involves verification of the effluent pH using a portable pH probe, the returned result will be compared with that of the static probe that's associated with the ETP asset. It is the understanding of NRW that if there are difference between the two readings, that would signify a calibration issue or fault and appropriate actions shall be taken by the Operator.

Permit condition 3.1.2 below states:

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

Compliance:

United Petfoods (UK) Ltd has failed to adhere to the BOD emission limits as specified within *Schedule 3(b): Table S3.2* for the S1 Outfall. NRW considers this to be a contravention of condition 3.1.2 of the permit. Consequently, a non-compliance score of C3 has been allocated against criteria IR3A.

General management relating to maintenance of Effluent Treatment Plant (ETP) has not been compliance assessed at this time, this is due to it being subject of a previous CAR form (CAR_NRW0048882) which was issued on the 21st of July 2025.

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 (action is ongoing from CAR_NRW0048882).

Schedule 5 Notifications

The Operator submitted this Schedule 5 Notification 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 was unable to undertake the required monitoring for a number of parameters (listed below) as specified within *Schedule 3(b): Table S3.2* for the Q2 Monitoring Period.

- 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)*. NRW was informed on the 7th of July 2025 that the Autosampler which was needed to collect the BAT required 24-hour flow proportional composite sample had been commissioned and was operational. It is the expectation of NRW that the Operator will be in compliance with permit condition 3.5.1a within the next reporting period.

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 IR3E.

- However, as United Petfoods (UK) Ltd has now deployed the necessary Autosampler in order to achieve compliance with permit condition 3.5.1a this non-compliance score has been suspended pending the Q3 monitoring review. Should United Petfoods (UK) Ltd not be in compliance with permit condition 3.5.1a within the Q3 monitoring review then this score will be reapplied retrospectively.

Action:

United Petfoods (UK) Ltd is to ensure they are compliant with permit condition 3.5.1a by monitoring in accordance with the methodology/frequency that is listed within *Schedule 3(b): Table S3.2*.

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.