

Compliance Assessment Report CAR_NRW0049490

Permit being assessed: BV9667IV.

For: Carmarthen EPR/BV9667IV, **held by:** ForFarmers Limited

At: ALLTYCNAP ROAD JOHNSTOWN , CARMARTHEN, CARMARTHEN, DYFED, SA31 3RD.

Type of assessment: Site Inspection,

Reason: Routine.

On: 22/09/2025 between 10:30 and 12:30.

Parts of permit assessed: Site inspection.

NRW Lead Officer: Daniel Packer, accompanied by Daren Pike.

Report sent to: Jeff Davies, Operations Manager - Carmarthen, on 29/09/2025.

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)	
IR2B - Installations - Operations - The site	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

Summary of Visit

The site visit was conducted to assess ongoing environmental performance, operational changes, and compliance with relevant permits and sustainability commitments. The visit included discussions with site representatives and a walkthrough of key operational areas including:

- raw material intake
- raw material storage
- weighing
- grinding, mixing, and pressing
- cooling
- finished product handing, packaging, and storage
- Waste storage
- Lorry wash

Key Observations

Carbon Reduction Strategy:

The operator confirmed ForFarmers has a group-wide commitment to achieving a 42% carbon reduction by 2030. The site has taken proactive steps toward this goal, including the installation of new steam sets that produce higher temperature, dryer steam. This upgrade has led to a reduction in energy consumption, contributing positively to their carbon reduction targets.

Control Room Upgrade:

A new control room has been installed outside the main building, replacing the older system previously located on the pressed floor area. This relocation improves operator safety and accessibility. A tunnel access to the control room is planned for future installation.



Photo above showing newly constructed control room.

Water Use and Abstraction:

The site currently abstracts water via a borehole for use in the lorry wash facility. A recent trial

successfully demonstrated the viability of feeding process water directly from the borehole through a UV filtration system. This system has now been permanently implemented, resulting in a reduction in mains water usage.



Photo above showing Lorry Wash area and bore hole extraction point

Operational Activity:

During the visit, a high level of activity was observed, including 2 lorries unloading raw materials into the bulk intake area 1 and 2. Emergency Spill Kit station was located at the unloading area.



Photo above showing lorries unloading into bulk intake area.

1 tanker unloading oil used in the product blending process into the bunded tank storage area was also observed.

Note, suggested that an additional Emergency Spill Kit Station should be installed at this area.



2no photos above showing lorry unloading into bunded storage tanks.

Packaging Line Status:

The site is currently unable to package product due to a conveyor failure. This issue is expected to be resolved within the coming week. A new conveyor has recently been installed on another line, indicating ongoing investment in infrastructure.

Waste Management

During the inspection, the hazardous waste storage area was visited. This area included an IBC for waste oil, which was appropriately placed on a bunded pallet to contain any potential spills. An emergency spill kit station was also located within this area. The spill kit was secured using easy-break tamper seal cable ties, allowing for quick access in emergencies and providing a clear visual indication if the kit has been previously accessed.

Note : suggested that a fire extinguisher station be installed in this area.



Photo above showing hazardous waste storage area and spill kit.

A separate waste storage area was also inspected. This area featured segregated skips for various waste streams including:

- Plastic
- General waste
- Cardboard & paper
- Scrap metal
- Empty IBCs

It was noted during the inspection that liquid was present inside one of the "empty IBCs". The operator confirmed that the tops of all IBCs in this area had been cut off, and the liquid observed was rainwater. It is recommended that the empty IBC storage area be covered to prevent further rainwater ingress and potential contamination or misclassification of waste.

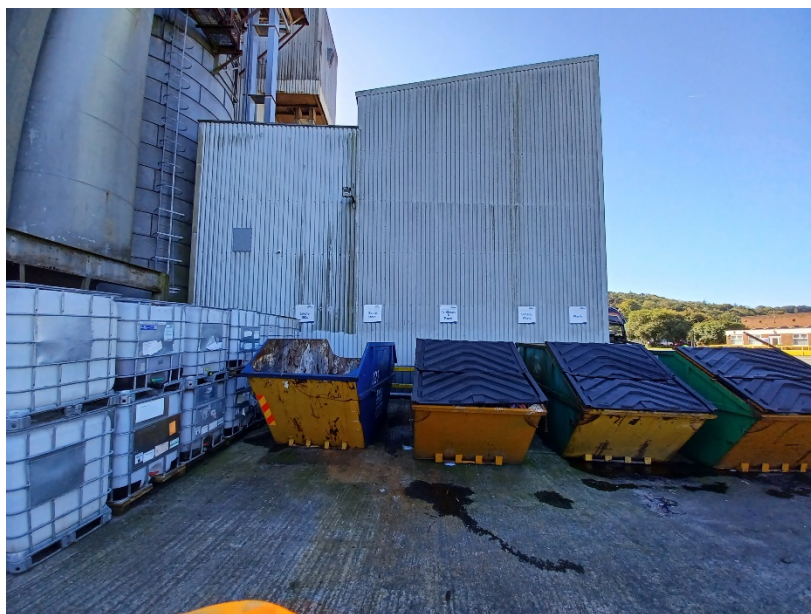


Photo above showing segregated waste storage and empty IBC storage area.

Emissions

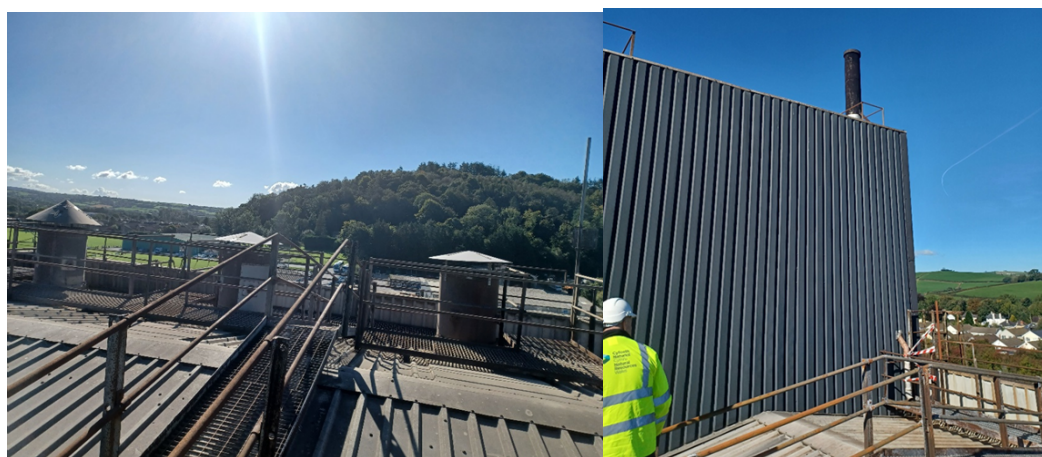
The operator also showed two grinder extraction points located at high level on the side of the building. Currently, scaffolding is erected for each MCERT inspection, but the operator indicated that there are plans to install a permanent access structure to improve efficiency and safety during future inspections.



Photo above showing grinder extraction points.

Additionally, four cooler emission points located on the main building roof were visited. The operator reported that no odour, dust, or complaints have been received for a significant period, indicating control measures are in place. Plans are in place to upgrade two dust extractor bins, with two units already updated.

The operator also noted that the roof and guttering system had recently been overwhelmed by an unusual rain shower, resulting in some water ingress into the building.



2no photos above showing 4 emission points located on main roof.

Medium Combustion Plant Boiler

The site currently operates 1.8 MW natural gas fuelled boiler for steam generation. This is listed in the permit as a Directly Associated Activity (Schedule 1, Table 1.1, A2).

The operator was reminded that under current permitting requirements, the installation permit will need to be varied before 1 January 2029 to include the new compliance requirements (including Emission Limit Values) of the Medium Combustion Plant Directive.

END.

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.