

## Compliance Assessment Report CAR\_NRW0050608

**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:** Report/Data Review,

**Reason:** Routine.

**On:** 31/12/2025.

**Parts of permit assessed:** Emissions and monitoring, Information.

**NRW Lead Officer:** Alex Bowder.

**Report sent to:** Dunbia (UK), Environmental Co-ordinator, on 06/02/2026.

### 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	3.1.2
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
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
1	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)	The operator is to investigate site activities to ensure that ammonia concentrations remain within the compliant ELV parameters going forward.	06/03/2026

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.**

**At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.**

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) has been issued in response to the submission of the Q3 (July - September) and Q4 (October - December) 2025 monitoring returns by Dunbia (UK) for activities at Cross Hands Meat Processing Plant, Cross Hands Business Park West, Llanelli SA14 6RF under permit EPR-BU8002IT.

This compliance assessment was undertaken on 6 February 2026. However, to ensure that the CCS score is attributed to the correct financial year for billing purposes, the date on the CAR has been adjusted to 31 December 2025.

#### **Q3 and Q4 2025 Monitoring Returns**

##### Emissions to water - Water 1 / 14/10/2025 and 05/01/2026

The returns for reporting of sampling and analysis of emissions to water (other than sewer) to discharge point **W5** for:

- **Q3** (1 July - 30 September 2025), and
- **Q4** (1 October - 31 December 2025)

were submitted to NRW on **14 October 2025** and **5 January 2026**, respectively.

##### Emissions to sewer - Sewer 1 / 14/10/2025 and 05/01/2026

The returns for reporting of sampling and analysis of emissions to sewer to discharge point **S1** for Q3 and Q4 2025 were submitted to NRW on 14 October 2025 and 5 January 2026.

#### **SCHEDULE 5 NOTIFICATION SUBMISSION**

On 12 August 2025, the operator submitted schedule 5 notification to NRW, containing a Part A notice (followed by Part B on 28 August 2025) detailing an exceedance of the ammonia ELV at emission point **W5**.

Table S3.2 - Point Source emissions to water specifies that:

Ammonia shall not exceed:  
 • **0.25 mg/l**

On **27 July 2025**, ammonia was recorded at **0.5 mg/l**, which exceeds the ELV specified in **Table S3.2**. The operator has provided the following explanation:

Following a thorough investigation, the operator was unable to identify a definitive cause for the exceedance recorded at 0.5 mg/l. No changes to site operations or conditions were observed that could account for the result. It is considered possible that this was an isolated anomaly. Subsequent sampling on 5 August 2025 confirmed a return to compliance, with a significantly lower concentration of 0.02 mg/l.

However, it is noted that the site has **historically exceeded** this parameter.

### Compliance Breach

In accordance with NRW's compliance scoring guidance, a non-compliance score of **C3** has been recorded against sub-criteria IR3A(1).

<p><b>C3 PERMIT BREACH</b>  <b>IR3A(1) - Emissions and monitoring - Emissions to water, air, or land</b></p>
<p><b>Emissions and monitoring, condition 3.1.2:</b>  <i>"The limits given in schedule 3 shall not be exceeded"</i></p>

### Action

**The operator is to investigate site activities to ensure that ammonia concentrations remain within the compliant ELV parameters going forward.**

### **Compliance Summary**

- The monitoring data for **Q3** and **Q4** 2025 was submitted within the required reporting periods, in compliance with permit condition 4.2.3.
- The monitoring was carried out during the correct **Q3** and **Q4** monitoring periods, meeting the requirements of permit condition 3.5.1.
- Based on the information provided in the monitoring reports, all other emissions at the specified monitoring points appear to be compliant with the permitted limits for the **Q3** and **Q4** 2025 reporting periods.

**Alex Bowder**

Senior Officer - Southwest Wales Industry Regulation

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**END OF REPORT**

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

### **Disputing the Content of this Compliance Assessment Report Form**

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

### **Concerns Not Related to the Content of this Compliance Assessment Report Form**

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk)

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** [ask@ombudsman.wales](mailto: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.