

Compliance Assessment Report CAR_NRW0050854

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: 31/12/2025.

Parts of permit assessed: See Section 4.

NRW Lead Officer: Benjamin Taylor.

Report sent to: Compliance Manager, United Petfoods (UK) Ltd, on 26/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	Permit condition 3.5.1.
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	Permit condition 3.5.1.
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	Permit condition 3.5.1.
IR4C - Installations - Information - Notification	C2 Significant	Permit condition 4.3.1b.
IR4B - Installations - Information - Reporting	C3 Minor	Permit condition 4.2.3.
IR1A - Installations - Management - General Management	C2 Significant	Permit condition 1.1.1.
IR4B - Installations - Information - Reporting	C4 No impact	Permit condition 4.2.3.
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	Permit condition 3.5.1.
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	Permit condition 3.5.1.
IR4C - Installations - Information - Notification	C2 Significant	Permit condition 4.3.1b.

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	C2 Significant	Permit condition 4.2.3.
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	Permit condition 3.1.2.
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	Permit condition 3.1.2.
IR1A - Installations - Management - General Management	C2 Significant	Permit condition 1.1.1.
IR4B - Installations - Information - Reporting	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
14	187.1

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
IR3E	CAR_NRW0050854.A1: United Petfoods (UK) Ltd is to confirm to NRW whether their in-house laboratory/analysis methods are in-line with the standards required by permit condition 3.5.1 and 3.5.3. Any confirmation must be accompanied by sufficient evidence.	27/03/2026
IR3E	CAR_NRW0050854.A2: United Petfoods (UK) Ltd is required to confirm to NRW what contingency measures, if any, are in place to ensure continuity of compliance monitoring in the event of any future failures/issues which impact equipment associated with the in house laboratory and it's testing.	03/04/2026
IR3E	As CAR_NRW0050854.A2 above.	03/04/2026
IR3E	As CAR_NRW0050854.A2 above.	03/04/2026
IR4C	CAR_NRW0050854.A3: United Petfoods (UK) Ltd must ensure that NRW is notified of any future permit breaches within the timeframe specified by the permit. They must also ensure that they use the correct format specified by permit condition 4.3.2.	26/02/2026
IR4B	CAR_NRW0050854.A4: United Petfoods (UK) Ltd is to submit the External Lab Certificates that are referenced 10275, 10347, 10415 for the sample analysis undertaken in July 2025 by the specified timeframe.	06/03/2026
IR1A	CAR_NRW0050854.A5: United Petfoods (UK) Ltd is required to submit to NRW, within the specified timeframe, all documented procedures and systems pertaining to compliance monitoring, reporting, and the notification of	13/03/2026

Criteria	Action needed	Complete by
	permit breaches to NRW.	
IR4B	CAR_NRW0050854.A6: United Petfoods (UK) Ltd is to ensure that they submit future Quarterly Monitoring Reports within the timeframe (28 days) specified by the permit.	26/02/2026
IR3E	CAR_NRW0050854.A7: United Petfoods (UK) Ltd must ensure that they monitor to the frequencies and standards that are specified within Schedule 3(b): Table S3.2.	26/02/2026
IR3E	As CAR_NRW0050854.A7 above.	26/02/2026
IR4C	As CAR_NRW0050854.A3 above.	26/02/2026
IR4B	CAR_NRW0050854.A8: United Petfoods (UK) Ltd must provide NRW with an explanation as to why the two exceedances (specifically Total Nitrogen on the 1st of October 2025 and Total Phosphorus on the 26th of November 2025) detailed on the external laboratory certificates were omitted from both the Quarter 4 2025 submission and the Effluent Test Result Averages 2025–2026 spreadsheet.	04/03/2026
IR3A(1)	CAR_NRW0050854.A9: United Petfoods (UK) Ltd is to undertake a retrospective investigation to identify the cause of the Total Nitrogen and Total Phosphorus exceedances recorded during the Quarter 4 reporting period. Details of this retrospective investigation must be submitted to NRW as evidence. They must ensure that they comply with the Emission Limit Values contained within Schedule 3(b): Table S3.2 of the permit.	10/04/2026
IR3A(1)	As CAR_NRW0050854.A9 above.	10/04/2026
IR1A	CAR_NRW0050854.A10: United Petfoods (UK) Ltd must confirm to NRW the training arrangements in place to ensure staff competence in managing the permit and meeting its requirements, as is stipulated by permit condition 1.1.1. This confirmation must cover training related to meeting permit obligations (i.e. monitoring, reporting, and notifying).	17/04/2026
IR4B	CAR_NRW0050854.A11: United Petfoods (UK) Ltd is to ensure that submit their annual reporting requirements within the timeframe specified by permit condition 4.2.2.	31/01/2027

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 regarding the review of quarterly monitoring data and reports which were submitted by United Petfoods UK Ltd (the Operator) to cover the Quarter 3 (Q3): July to September 2025, Quarter 4 (Q4): October to December 2025 and Annual 2025 reporting period.

Scope

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

- UPF Reporting CB3091HY Q3 01.07.25 to 30.09.25
- UPF Reporting CB3091HY Q4 01.10.25 to 31.12.25
- Effluent Discharge Summary Report 2025.
- United Petfood Reporting Annual Returns 2025 CB3091HY.
 - Form: Air1 / 04/12/2023.
 - Form: Water1 / 04/12/2023.
 - Form: WaterUsage1 / 04/12/2023.
 - Form: EnergyUsage1 / 04/12/2023.
 - Form: Performance1 / 04/12/2023.

Quarter 3 2025 Monitoring Review – Emissions to Water

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

United Petfoods (UK) Ltd submitted their Q3 monitoring data on the 8th of October 2025. This was noted as within the timeframe (of 28 days) as is specified by 4.2.3 of the EPR permit.

Within the *UPF Reporting CB3091HY Q3 01.07.25 to 30.09.25*, United Petfoods (UK) Ltd reported no exceedances of the permitted Emission Limit Values (ELVs) to water, as are specified in *Schedule 3(b), Table S3.2*.

In-House Monitoring

In order to satisfy the requirements of an outstanding Improvement Condition (IC4), NRW requested that United Petfoods (UK) Ltd submit external lab certificates from 1st of July 2025 to 7th of December 2025. These were to be used to demonstrate compliance with the BAT-AELS (Conclusion 12 of *Best Available Techniques (BAT) Reference Document for the Food, Drink and Milk Industries*).

On review of these submitted documents, it was identified that United Petfoods (UK) Ltd is utilising

an external UKAS Accredited Laboratory for permitted monitoring on a once per week basis. NRW were then informed via email correspondence on the 5th of February 2026 that analysis for permitted parameters for the remaining operational days are undertaken in-house within their onsite laboratory. United Petfoods (UK) submitted a spreadsheet (*Effluent Test Result Averages 2025–2026*) detailing the 2025 results as evidence of this daily testing being undertaken.

NRW currently is uncertain of the monitoring standards of these in-house methods, or whether the United Petfoods (UK) Ltd onsite laboratory or it's equipment holds any form of accreditation. United Petfoods (UK) Ltd must ensure that any monitoring associated with permit compliance meets the standards listed within *Schedule 3(b): Table S3.2* which is a requirement of permit condition 3.5.1 detailed 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.'

NRW has not compliance assessed the reliance on in-house methods at this time, this is planned to be the subject of a future Site Inspection and CAR forms in 2026.

Action:

CAR_NRW0050854.A1: United Petfoods (UK) Ltd is to confirm to NRW whether their in-house laboratory/analysis methods are in-line with the standards required by permit condition 3.5.1 and 3.5.3. Any confirmation must be accompanied by sufficient evidence.

Failure to Monitor

Following review of the submitted spreadsheet (*Effluent Test Result Averages 2025 – 2026*) in addition to written confirmation by the Operator, it has come to the attention of NRW that there were instances where United Petfoods (UK) Ltd did not monitor in accordance with the permit for the following parameters:

- Chemical Oxygen Demand (COD)
- Total Suspended Solids (TSS)
- Total Nitrogen

Comments offered by United Petfoods (UK) Ltd indicate that these failures were attributed to issues with in-house laboratory equipment (i.e. Vacuum Oven, COD Thermal Reactor) or the initial set-up configuration of the V-Notch Autosampler which meant a representative sample could not be collected. It is the understanding of NRW that analysis was undertaken on the 'unrepresentative' samples collected in July (Lab Certificates Reference: 10275, 10347, 10415), however the results for these particularly in the case of Total Nitrogen (besides calculated) have not been reported to NRW. This will be discussed within a later section of the CAR form.

Compliance:

United Petfoods (UK) Ltd has failed to monitor in accordance with the EPR permit. This is a contravention of permit condition 3.5.1, and consequently a non-compliance score of C3 has been

allocated for each parameter (COD, TSS and Total Nitrogen) against criteria IR3E – Monitoring.

Action:

CAR_NRW0050854.A2: United Petfoods (UK) Ltd is required to confirm to NRW what contingency measures, if any, are in place to ensure continuity of compliance monitoring in the event of any future failures/issues which impact equipment associated with the in-house laboratory and it's testing.

Failure to Notify

NRW were not notified of the above instances where monitoring was not undertaken due to issues with the onsite laboratory equipment or configuration of the autosampler during the Q3 reporting period.

Permit condition 4.3.1b states:

*'(b) in the event of a breach of any permit condition the operator must immediately —
(i) inform Natural Resources Wales, and'*

Failure to monitor, as detailed above within the section above is a contravention of permit condition 3.5.1 and as a result, there was a requirement for NRW to be notified (i.e. via submission of a Schedule 5 Notification).

Compliance:

United Petfoods (UK) Ltd has failed to notify NRW of permit breaches as is required by the EPR permit. This is a contravention of permit condition 4.3.1b. It is important to highlight that this contravention is not an isolated instance, with United Petfoods (UK) Ltd demonstrating a history of failing to notify NRW of instances of permit breaches. Consequently, a non-compliance score of C2 has been allocated against criteria IR4C – Notification.

Action:

CAR_NRW0050854.A3: United Petfoods (UK) Ltd must ensure that NRW is notified of any future permit breaches within the timeframe specified by the permit. They must also ensure that they use the correct format specified by permit condition 4.3.2.

Reporting

Review of lab certificates in conjunction with the in-house monitoring results indicate that United Petfoods (UK) Ltd is failing to report the highest figures to NRW within their Quarter 3 Monitoring Submission. There were discrepancies noted for the following parameters:

- pH
- Temperature
- Chemical Oxygen Demand (COD)

- Total Suspended Solids (TSS)
- Total Nitrogen

It is noted that the reported figure for Total Nitrogen was exactly on the ELV within the dates in which the Autosampler was failing to collect a representative sample, these figures for July were missing from the submitted spreadsheet (*Effluent Test Result Averages 2025 – 2026*). This requirement to report the maximum figure is specified within *Note 1* of the footnote associated with the *Water1 / 04/12/23* reporting form in addition to *Schedule 3(b): Table S3.2*.

As outlined previously, NRW is yet to determine the monitoring standards of these in-house tests. They may be unsuitable for utilisation to determine permit compliance and be limited to providing an indicative insight into the process operations for the Operator. If this is found to be the case, then United Petfoods (UK) Ltd will need to seek alternative compliance testing methods.

Compliance:

United Petfoods (UK) Ltd has failed to accurately report the maximum recorded figure within their Quarter 3 monitoring submission. This is a contravention of permit condition 4.2.3. As a result, a non-compliance score of C3 has been applied against compliance criterion IR4B – Reporting. In accordance with NRW's scoring guidelines, scores relating to reporting failures during the Q3 reporting period have been consolidated into a singular non-compliance score.

This non-compliance was identified following NRW's receipt of analytical results directly from external laboratories, in addition to the operator's in-house testing records. While the submission of external laboratory reports to NRW is not routine practice, their receipt in this instance has provided enhanced visibility of United Petfoods (UK) Ltd.'s reporting accuracy.

Action:

CAR_NRW0050854.A4: United Petfoods (UK) Ltd is to submit the External Lab Certificates that are referenced 10275, 10347, 10415 for the sample analysis undertaken in July 2025 by the specified timeframe.

General Management

Permit condition 1.1.1 states:

'The operator shall manage and operate the activities:

- a. in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and*
- b. using sufficient competent persons and resources.'*

It is considered that the root cause behind the above non-compliances (specifically failure to monitor, failure to notify and failure to report) during the Quarter 3 2025 reporting period are the result of inadequate management controls and procedures in regards to compliance monitoring, notifying and

reporting to NRW. This is a contravention of permit condition 1.1.1, and consequently an additional non-compliance score of C2 has been applied against compliance criterion IR1A – General Management.

Action:

CAR_NRW0050854.A5: United Petfoods (UK) Ltd is required to submit to NRW, within the specified timeframe, all documented procedures and systems pertaining to compliance monitoring, reporting, and the notification of permit breaches to NRW.

Quarter 4 2025 Monitoring Review – Emissions to Water

United Petfoods (UK) Ltd submitted their Q4 monitoring data on the 30th of January 2026. This is outside of the timeframe (of 28 days) as is specified by 4.2.3 of the EPR permit.

Compliance:

United Petfoods (UK) Ltd has failed to submit their Q4 monitoring report by the timeframe specified within the EPR Permit. This is a contravention of permit condition 4.2.3, and consequently a non-compliance score of C4 has been applied against compliance criterion IR4B – Reporting.

Action:

CAR_NRW0050854.A6: United Petfoods (UK) Ltd is to ensure that they submit future Quarterly Monitoring Reports within the timeframe (28 days) specified by the permit.

Exceedance of Maximum Daily Discharge Volume

There were nine reported exceedances of the maximum daily discharge volume limit (1000m³) during the Quarter 4 Reporting Period.

Monitoring Date	Monitoring Location	Parameter	Schedule 5 Notification: Reported Value
04/11/2025	W1	Maximum Daily Discharge Volume	3468.62m ³
05/11/2025	W1	Maximum Daily Discharge Volume	3545.07m ³
01/12/2025	W1	Maximum Daily Discharge Volume	1618.00m ³
02/12/2025	W1	Maximum Daily Discharge Volume	1327.81m ³
09/12/2025	W1	Maximum Daily Discharge Volume	2503.00m ³
10/12/2025	W1	Maximum Daily Discharge Volume	1542.32m ³

15/12/2025	W1	Maximum Daily Discharge Volume	1338.18m ³
17/12/2025	W1	Maximum Daily Discharge Volume	1368.69m ³
18/12/2025	W1	Maximum Daily Discharge Volume	1553.87m ³

Table 1: List of Maximum Daily Discharge Volume Exceedances in Quarter 4 2025.

Review of the submitted Schedule 5 Notifications indicate that the Operator is attributing the above exceedances to heavy rainfall, which in some instances resulted in flooding events from the adjacent watercourses (Afon Tywi/Afon Bran). The Operator has supported this claim via inclusion of weather data (including rainfall) from their onsite weather station, in addition to river level graphs from the NRW website (*Bran at Llangadog*) for the days in question. The Site is fitted with flood gates, with a linear drainage channel which directs floodwater into the ETP via the V-Notch Chamber.

In light of the above information, NRW does not consider these exceedances to be a non-compliance with the permit for the Quarter 4 2025 Reporting Period. Please be advised that NRW reserves the right to score this as a non-compliance in future reporting periods, or should new information be attained.

Within the *UPF Reporting CB3091HY Q4 01.10.25 to 31.12.25*, there were no further reported exceedances of the permitted Emission Limit Values (ELVs) to water, as are specified in *Schedule 3(b), Table S3.2*.

Failure to Monitor

It was noted within the *Effluent Test Result Averages 2025 – 2026* spreadsheet that United Petfoods (UK) Ltd did not monitor in accordance with the permit in the following instances:

- Chemical Oxygen Demand: 28th to 29th of November 2025.
- Maximum Daily Discharge Volume: 3rd of December to 8th of December 2025.

There is a requirement to monitor COD on a daily basis, while the Maximum Daily Discharge Volume has a continuous monitoring requirement. United Petfoods (UK) Ltd has attributed these monitoring failures to a lack of COD vials for the onsite laboratory equipment and to an issue with the SD card associated with the V-Notch MCERTS-certified flowmeter.

Compliance:

United Petfoods (UK) Ltd has failed to monitor in accordance with the EPR permit. This is a contravention of permit condition 3.5.1, and consequently a non-compliance score of C3 has been allocated for each monitoring failure against compliance criterion IR3E – Monitoring.

Action:

CAR_NRW0050854.A7: United Petfoods (UK) Ltd must ensure that they monitor to the frequencies and standards that are specified within *Schedule 3(b): Table S3.2*.

Failure to Notify

NRW were not notified of the above instances where monitoring was not undertaken due to issues with the onsite laboratory and monitoring equipment.

Furthermore, NRW were also not notified in instances where ELVs listed within *Schedule 3b: Table S3.2* for Total Nitrogen and Total Phosphorus were exceeded, this is contained within the next section of the CAR form.

Compliance:

United Petfoods (UK) Ltd failed to notify NRW of a breach of permit as required by the permit. This is a contravention of permit condition 4.3.1(b). It is important to highlight that this contravention is not an isolated instance, with United Petfoods (UK) Ltd demonstrating a history of failing to notify NRW of instances of permit breaches. Consequently, a non-compliance score of C2 has been applied against compliance criterion IR4C – Notification. In accordance with NRW's scoring guidelines, scores relating to notification failures during the Q4 reporting period have been consolidated into a singular non-compliance score.

Action:

As CAR_NRW0050854.A3 above.

Failure to Report

As previously outlined, in order to satisfy the requirements of the outstanding IC4, United Petfoods (UK) Ltd submitted external laboratory certificates for the Quarter 3 and Quarter 4 Reporting Period.

As discussed above, on review of these lab certificates in conjunction with the in-house monitoring spreadsheet, it appears that United Petfoods (UK) Ltd has failed to report the highest figures to NRW within their Quarter 4 Monitoring Submission. This requirement to report the maximum figure is specified within *Note 1* of the footnote associated with the Water1 / 04/12/23 reporting form in addition to *Schedule 3(b): Table S3.2*. There were discrepancies noted for the following parameters:

- pH
- Total Aluminium
- Chemical Oxygen Demand (COD)
- Total Phosphorus
- Total Nitrogen
- Total Suspended Solids (TSS)

There is particular concern regarding Total Nitrogen (ELV: 20 mg/l) and Total Phosphorus (ELV: 2 mg/l), for which United Petfoods (UK) Ltd appears not to have reported exceedances of the

permitted levels within its Quarter 4 Monitoring Submission. The relevant data is extracted below:

- Total Phosphorus – 3.5mg/l – 26th of November 2025 – *Lab Certificate Reference 11839*.
- Total Nitrogen – 21.4mg/l – 1st of October 2025 – *Lab Certificate Reference 11207*.

Additionally, for the parameters and dates listed above, discrepancies have been identified between the laboratory certificate data and the figures recorded within the *Effluent Test Result Averages 2025–2026* spreadsheet. NRW is currently unable to determine the reason for these inconsistencies across the three data sources.

Compliance:

United Petfoods (UK) Ltd has failed to report the highest recorded figures to NRW within their Quarter 3 and Quarter 4 submissions, this includes two exceedances of permitted ELVs for Total Nitrogen and Total Phosphorus. It is important to highlight that the Site discharges into a SSSI/SAC designated watercourse. Furthermore, there are discrepancies noted between some of the lab certificates and what is detailed on the *Effluent Test Result Averages 2025–2026* spreadsheet. Consequently, a non-compliance score of C2 has been allocated against compliance criterion IR4B – Reporting. In accordance with NRW's scoring guidelines, scores relating to reporting failures during the Q4 reporting period have been consolidated into a singular non-compliance score.

Action:

CAR_NRW0050854.A8: United Petfoods (UK) Ltd must provide NRW with an explanation as to why the two exceedances (specifically Total Nitrogen on the 1st of October 2025 and Total Phosphorus on the 26th of November 2025) detailed on the external laboratory certificates were omitted from both the Quarter 4 2025 submission and the *Effluent Test Result Averages 2025–2026* spreadsheet.

Emissions to Water

As outlined above, it has come to NRW's attention (following review of *External Laboratory Certificates 11839* and *11207*) that United Petfoods (UK) Ltd exceeded the emission limit values (ELVs) specified in Schedule 3(b), Table S3.2 for Total Nitrogen (20 mg/l) and Total Phosphorus (2.0 mg/l) during the Quarter 4 reporting period. This breach was confirmed following application of the appropriate uncertainty factor (95%, as specified under *Note 4* of the Water1 / 04/12/23 reporting form, and also 99%, as is included by United Petfoods (UK) Ltd under the relevant column of their submission).

Permit condition 3.1.2 of the permit states:

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

Compliance:

United Petfoods (UK) Ltd failed to adhere to the Emission Limit Values (ELVs) that are specified

within *Schedule 3(b): Table S3.2* for Total Nitrogen and Total Phosphorus. This is a contravention of permit condition 3.1.2. Consequently, a non-compliance score of C3 has been allocated against each ELV exceedance against compliance criterion IR3A(1) – Emissions to water

Action:

CAR_NRW0050854.A9: United Petfoods (UK) Ltd is to undertake a retrospective investigation to identify the cause of the Total Nitrogen and Total Phosphorus exceedances recorded during the Quarter 4 reporting period. Details of this retrospective investigation must be submitted to NRW as evidence. They must ensure that they comply with the Emission Limit Values contained within Schedule 3(b): Table S3.2 of the permit.

General Management

It is considered that the root cause behind the above non-compliances (specifically failure to monitor, failure to notify, failure to report and ELV exceedances to controlled waters) during the Quarter 4 2025 reporting period are the result of inadequate management controls and procedures in regards to compliance monitoring, notifying and reporting to NRW. This is a contravention of permit condition 1.1.1, and consequently an additional non-compliance score of C2 has been applied against compliance criterion IR1A – General Management.

Action:

CAR_NRW0050854.A10: United Petfoods (UK) Ltd must confirm to NRW the training arrangements in place to ensure staff competence in managing the permit and meeting its requirements, as is stipulated by permit condition 1.1.1. This confirmation must cover training related to meeting permit obligations (i.e. monitoring, reporting, and notifying).

Annual Report

To fulfil the annual reporting requirements, United Petfoods (UK) Ltd submitted the following documents:

- Effluent Discharge Summary Report 2025.
- United Petfood Reporting Annual Returns 2025 CB3091HY.
 - Form: Air1 / 04/12/2023.
 - Form: Water1 / 04/12/2023.
 - Form: WaterUsage1 / 04/12/2023.
 - Form: EnergyUsage1 / 04/12/2023.
 - Form: Performance1 / 04/12/2023.

These above documents were submitted on the 3rd of February 2026, this was outside the timeframe (by the 31st of January 2025) that is specified by permit condition 4.2.2. The Operator outlined this was due to a delay in receiving energy usage figures from the finance department. NRW were made aware of this ahead of the deadline and as a result, a non-compliance score will not be attributed in this instance.

Action:

CAR_NRW0050854.A11: United Petfoods (UK) Ltd is to ensure that submit their annual reporting requirements within the timeframe specified by permit condition 4.2.2.

The submitted reports detailed the informative requirements (*Schedule 4: Table S4.2 and S4.3*) which were outlined by permit condition 4.2.2a to 4.2.2c.

Please note: This CAR report and assessment was undertaken on 25th of February 2026. However to ensure that the non-compliance score is attributed to the correct financial year (for billing) the date on CARS system has been altered to 31st of December 2025.

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

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

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.