

## Compliance Assessment Report CAR\_NRW0051650

**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:** 28/04/2026.

**Parts of permit assessed:** See Section 4.

**NRW Lead Officer:** Benjamin Taylor.

**Report sent to:** Compliance Manager, United Petfoods (UK) Ltd, on 30/04/2026.

### 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	Permit condition 3.1.2.
IR1A - Installations - Management - General Management	C3 Minor	Permit condition 1.1.1.
IR4C - Installations - Information - Notification	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	Permit condition 3.1.2.
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	Permit condition 3.5.1.
IR1A - Installations - Management - General Management	C3 Minor	Permit condition 1.1.1.

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

Total non-compliances recorded	Total non-compliance score
5	20

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 review their cleaning procedures associated with the autosampler to ensure validity of all future samples obtained from the asset. Once completed, a copy of the procedure is to be submitted as evidence.	Already completed
IR1A	As action above.	Already completed
IR4C	United Petfoods (UK) Ltd is to ensure that NRW is notified in the first instance after becoming aware of a suspected permit breach.	28/07/2026
IR1A	United Petfoods (UK) Ltd must ensure there is a clear understanding of responsibilities relating to roles associated with permit compliance and monitoring. They must also ensure that there is an effective handover process or documentation to prevent recurrence in the eventuality of future changes in personnel.	Already completed
IR3A(1)	United Petfoods (UK) Ltd is to adhere to the emission limits that are specified within Schedule 3(b): Table S3.2.	28/07/2026
IR3E	United Petfoods (UK) Ltd must revise its analytical methodology to ensure it is capable of accurately determining and reporting Total Phosphorus concentrations in discharges to controlled waters.	Already completed
IR1A	United Petfoods (UK) Ltd must review all in-house analytical methods to ensure that the operating ranges are appropriate for the limits specified in Schedule 3(b): Table S3.2 of the permit. The Operator must also ensure that laboratory technicians are aware of any limitations associated with onsite analytical equipment and seek clarification where there is uncertainty, particularly when testing for new parameters.	28/07/2026

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.**

**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 reports and Schedule 5: Notifications which were submitted by United Petfoods UK Ltd (the Operator) to cover the Quarter 1 (Q1): January to March 2026 Reporting Period.

## Scope

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

- *UPF Reporting CB3091HY Q1 01.01.26 to 31.03.26*
- *Schedule 5 Notification 12th January 2026 CB3091HY*
- *Schedule 5 Notification 20th January 2026 CB3091HY*
- *Schedule 5 Notification 11th February 2026 CB3091HY Signed*
- *Schedule 5 Notification 24th February 2026 CB3091HY signed*
- *Schedule 5 Notification 27th February 2026 CB3091HY signed*

## Quarter 1 2026 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 Q1 monitoring data on the 8<sup>th</sup> of April 2026. This was noted as within the timeframe (of 28 days) that is specified by 4.2.3 of the EPR permit.

## Exceedance of Maximum Daily Discharge Volume

There were three reported exceedances of the maximum daily discharge volume limit (1000m<sup>3</sup>) during the Q1 2026 Reporting Period.

Monitoring Date	Monitoring Location	Parameter	Schedule 5 Notification: Reported Value
13/01/2026	W1	Maximum Daily Discharge Volume	1116.53m <sup>3</sup>
20/01/2026	W1	Maximum Daily Discharge Volume	1022.74m <sup>3</sup>
27/02/2026	W1	Maximum Daily Discharge Volume	1200.54m <sup>3</sup>

*Table 1: List of Maximum Daily Discharge Volume Exceedances in Quarter 1 2026.*

A review of the submitted Schedule 5 Notifications indicates that the Operator is attributing the above exceedances to heavy rainfall occurring either on the day of the breach or on the preceding days. 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. Currently, all drainage infrastructure is routed through the ETP and the MCERTS flowmeter prior to discharge to the Afon Tywi.

In light of the above information, NRW does not consider these exceedances to be a non-compliance with the permit for the Quarter 1 2026 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.

### Chemical Oxygen Demand (COD)

There was a singular reported exceedance of the COD limit (<100mg/l) during the Q1 2026 Reporting Period.

Monitoring Date	Monitoring Location	Parameter	Schedule 5 Notification: Reported Value
08/01/2026	W1	Chemical Oxygen Demand (COD)	156mg/l

Table 2: List of Chemical Oxygen Demand (COD) exceedances in Quarter 1 2026.

The above exceedance has been attributed to inadequate cleaning of the collection vessel associated with the V-Notch Autosampler by onsite personnel. It is acknowledged that on the 27<sup>th</sup> of March 2026, United Petfoods (UK) Ltd has provided NRW with a cleaning procedure for the autosampler which details the proposed daily and weekly cleaning measures, this was submitted in response to actions associated with the previous CAR\_NRW0050854.

NRW was also informed that, as a precautionary measure to mitigate the risk of biological die-off within the ETP filter bed, Aquatreat was commissioned to attend site on the 5<sup>th</sup> of February 2026 to re-seed the filter bed with *Trufloc Formula 33*. Additionally, United Petfoods (UK) Ltd has also advised NRW of its intention to develop an internal mechanism to re-seed the filter bed with *Trufloc Formula 33* during periods where biological activity may be adversely affected, such as during cold weather spells or reduced ETP throughput. This will include storage of the product (*Trufloc Formula 33*) onsite ready for deployment.

Furthermore, United Petfoods (UK) Ltd has informed NRW that they have expanded the scope of their routine sampling to include weekly sampling both before and after the filter bed. This is a notable improvement, as it will facilitate more effective monitoring of filter bed performance and is in line with the *Best Available Techniques (BAT) Reference Document for the Food, Drink and Milk Industries*.

### Compliance:

Permit condition 3.1.2 of the permit states:

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

United Petfoods (UK) Ltd has failed to adhere to the Emission Limit Values (ELVs) that are specified within *Schedule 3(b): Table S3.2*. This is a contravention of permit condition 3.1.2 detailed above and consequently, a non-compliance score of C3 has been allocated against compliance criterion IR3A(1)

– Emissions to Water.

**Action:**

**United Petfoods (UK) Ltd is to review their cleaning procedures associated with the autosampler to ensure validity of all future samples obtained from the asset. Once completed, a copy of the procedure is to be submitted as evidence (already completed).**

**Compliance:**

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 of the above contravention is due to insufficient management and procedures relating to sampling equipment and assets associated with the Effluent Treatment Plant (ETP). In this instance, this is the insufficient cleaning of the collection vessel associated with the autosampler, and potentially allowing for the deterioration of the biological activity of the filter bed. This is a contravention of permit condition 1.1.1, and consequently an additional non-compliance score of C3 has been allocated against compliance criterion IR1A – General Management.

**Action:**

**As action above (already completed).**

There was a delay in NRW being notified of the above exceedance of COD. United Petfoods (UK) Ltd informed NRW that this was due to uncertainty regarding responsibilities following a change of onsite personnel. As a result, clarification of the elevated COD result was not sought by United Petfoods (UK) Ltd until 15 days after initial receipt. It is important that United Petfoods (UK) Ltd notifies NRW in the first instance of any exceedance, prior to seeking clarification or confirmation from their external laboratory. Should it be determined that the exceedance was erroneous, the notification can then be withdrawn.

**Compliance:**

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'*

United Petfoods (UK) Ltd failed to notify NRW within the specified timeframe, constituting a contravention of permit condition 4.3.1b. However, this failure has already been scored within a previous CAR form (CAR\_NRW0050854) and considered that an insufficient time has elapsed since the issuing of that CAR for the Operator to fully implement the necessary changes. Furthermore, it is acknowledged that United Petfoods (UK) Ltd has since implemented a series of improvements aimed at rectifying this non-compliance. On this basis, this matter will not be subject to compliance assessment within this CAR.

**Action:**

**United Petfoods (UK) Ltd is to ensure that NRW is notified in the first instance after becoming aware of a suspected permit breach.**

Uncertainty regarding roles and responsibilities following changes in on-site personnel is considered to represent a lack of operational resilience and is indicative of insufficient general management. This constitutes a contravention of permit condition 1.1.1. However, similarly to above, it is considered that this failure has already been recorded and scored within CAR\_NRW0050854, and that insufficient time has elapsed since the issue of that CAR form for the Operator to implement the necessary changes. Consequently, this matter will not be subject to compliance assessment within this CAR form.

**Action:**

**United Petfoods (UK) Ltd must ensure there is a clear understanding of responsibilities relating to roles associated with permit compliance and monitoring. They must also ensure that there is an effective handover process or documentation to prevent recurrence in the eventuality of future changes in personnel (already completed).**

**Total Phosphorous**

There was a singular reported exceedance of the Total Phosphorous limit (<2mg/l) during the Q1 2026 Reporting Period.

Monitoring Date	Monitoring Location	Parameter	Schedule 5 Notification: Reported Value
24/02/2026	W1	Total Phosphorous (TP)	2.88mg/l

*Table 3: List of Total Phosphorous (TP) exceedances in Quarter 1 2026.*

United Petfoods (UK) Ltd has been unable to identify a definitive cause for the exceedance of Total Phosphorus. Potential contributing factors suggested include inadequate cleaning of the V-Notch Autosampler or carry over from the Dissolved Air Flotation (DAF) process from flocculation break off.

As outlined within the Section above, United Petfoods (UK) Ltd has already developed an autosampler cleaning procedure and also informed NRW that they have implemented additional training for ETP operators, Engineering, and Quality personnel to reduce recurrence of DAF carry over in the future.

**Compliance:**

United Petfoods (UK) Ltd has failed to adhere to the Emission Limit Values (ELVs) that are specified within *Schedule 3(b): Table S3.2*. This is a contravention of permit condition 3.1.2 detailed above and consequently, a non-compliance score of C3 has been allocated against compliance criterion IR3A(1) – Emissions to Water.

**Action:**

**United Petfoods (UK) Ltd is to adhere to the emission limits that are specified within *Schedule 3(b): Table S3.2*.**

It is considered that the root cause of the above contravention is due to insufficient management and procedures relating to sampling equipment and assets associated with the Effluent Treatment Plant (ETP). In this instance, this is the insufficient cleaning of the collection vessel associated with the autosampler or flocculation break-off in the DAF. This is a contravention of permit condition 1.1.1. There is an overlap with the root cause identified for the COD exceedance and, as a result, this score will be consolidated with the one above for IR1A – General Management.

**Monitoring – Total Phosphorus**

Following this exceedance, United Petfoods (UK) Ltd identified a limitation with the onsite *Palintest Lumiso Photometer*, whereby the operating range of the device (0 – 1.3 mg/l, as stated in the *Palintest Lumiso Brochure: [Lumiso-Brochure-Consumables.pdf](#)*) is lower than the permitted limit for Total Phosphorus specified in *Schedule 3(b): Table S3.2* of the permit.

As a result of this limitation, onsite laboratory technicians were required to undertake specific sample dilution for any results exceeding 1.32 mg/l TP in order to obtain an accurate daily result. However, due to a lack of awareness of this limitation, this dilution was not being undertaken.

On review of the *Effluent Test Result Averages 2025 – 2026* spreadsheet, which includes both in-house and external laboratory analysis, it was identified that there was 46 instances (approximately 18% of operational days) where Total Phosphorus levels from in-house methods were listed as or exceeding 1.32 mg/l. Of these instances, 41 results were not validated by analysis from the external accredited laboratory. Consequently, there is a risk that permit exceedances may have gone undetected and therefore were not subject to investigation by United Petfoods (UK) Ltd.

To mitigate this risk going forward, the *Schedule 5: Notification* outlines a proposed change to the in-house Total Phosphorus analysis, which would utilise specific phosphorus testing vials with an extended analytical range, thereby removing sample dilution requirements.

**Compliance:**

Permit condition 3.5.1 below states:

*'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.'*

Due to the limitation of the onsite *Palintest Lumiso Photometer*, United Petfoods (UK) Ltd has been unable to fully quantify the levels of Total Phosphorus being discharged via the V-Notch Chamber. This is a contravention of permit condition 3.5.1 and consequently, a non-compliance score of C3 has been allocated against compliance criterion IR3E – Monitoring.

**Action:**

**United Petfoods (UK) Ltd must revise its analytical methodology to ensure it is capable of accurately determining and reporting Total Phosphorus concentrations in discharges to controlled waters (already completed).**

It is considered that the root cause of monitoring failure is the lack of knowledge of the limitations associated with the *Palintest Lumiso Photometer*, this is indicative of insufficient training/procedures surrounding analysis. This is a contravention of permit condition 1.1.1, and consequently an additional non-compliance score of C3 has been allocated against compliance criterion IR1A – General Management.

**Action:**

**United Petfoods (UK) Ltd must review all in-house analytical methods to ensure that the operating ranges are appropriate for the limits specified in Schedule 3(b): Table S3.2 of the permit. The company must also ensure that laboratory technicians are aware of any limitations associated with onsite analytical equipment and seek clarification where there is uncertainty, particularly when testing for new parameters.**

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.