

Compliance Assessment Report CAR_NRW0051654

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: 29/04/2026.

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
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	

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?

Criteria	Action needed	Complete by
IR3E	United Petfoods (UK) Ltd must install a continuous pH monitoring system downstream of treatment to ensure the capability to monitor in accordance with the requirements set out in Schedule 3(b): Table S3.2.	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 clarification surrounding the monitoring requirement for pH as is stipulated within *Schedule 3(b): Table S3.2* of permit EPR/CB3091HY.

Scope

The following items of information have been utilised during the completion of this Compliance Assessment Report (CAR):

- UPF Reporting CB3091HY Q1 01.01.26 to 31.03.26
- *Schedule 3(b): Table S3.2* of permit EPR/CB3091HY
- Email submission (*CB3091HY - Q1 Report*) from United Petfoods (UK) Ltd, dated 28th of April 2026.

Monitoring Requirements: pH

It has come to the attention of NRW that United Petfoods (UK) Ltd is not undertaking continuous monitoring for pH as is specified *Schedule 3(b): Table S3.2* of the permit. This was confirmed by the Operator on the 28th of April 2026, who instead are currently testing for pH via 24 hour composite sampling.

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements							
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference Period	Monitoring frequency	Compliance statistic	Monitoring standard or method
S1 [point S1 on site plan in Schedule 7 emission to Afon Tywij]	Effluent Treatment plant processing process effluent and uncontaminated surface water drainage	Oil and grease	None visible	Instantaneous (visual examination)	Once every week	None visible	Visual check
		pH	6 – 8.5	Instantaneous (spot sample)	Continuous	Minimum and maximum	BS EN 10523
		Temperature	29 °C	Instantaneous (spot sample)	Continuous	Maximum	Standard thermocouple
		Total aluminium as Al	1.0 mg/L	Instantaneous (spot sample)	Once every week	Maximum	BS EN ISO 11885
		Biochemical oxygen demand (BOD)	40 mg/L	24-hour flow proportional composite	Once every month	Maximum	BS EN 1899-1

Figure 1: Extract from *Schedule 3(b): Table S3.2* of EPR/CB3091HY

Whilst *Schedule 3(b): Table S3.2* does clearly specify that there is a *Continuous* requirement beneath the *Monitoring frequency* header, it is noted that there is a lack of clarity particularly with the inclusion of *Instantaneous (spot sample)* within the *Reference Period* column of the table for pH and Temperature parameters. These two requirements appear contradictory.

Following a review of alternative permits within the same sector, it is the view of the Regulating Officer

that the inclusion of “(spot sample)” within the table is erroneous. It is considered that the table should instead specify *Instantaneous* only.

This matter was communicated to United Petfoods (UK) Ltd on the 29th of April 2026. In response, the Operator has advised NRW that they intend to pursue the installation of a continuous pH monitoring asset within the V-Notch Chamber in order to align with the permitted monitoring requirements.

In light of the above information, a non-compliance score will not be attributed to the failure to monitor in accordance with permit condition 3.5.1. 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.

Action:

United Petfoods (UK) Ltd must install a continuous pH monitoring system downstream of treatment to ensure the capability to monitor in accordance with the requirements set out in *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 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.