OMA Report – Discharges to Water – EPR

Summary sheet			
Permit Number: EPR/GP3235GH	Compliance Officer: Rick Prichard		
Operator: Pilgrims UK Lamb Ltd	Auditor (if different):		
Emission Point(s): W1	Others Present:		
OMA Sections			SCORE
OMA 1 – Management of monitoring			20/25 – 80%
OMA 2 – Periodic monitoring and test laboratories			38/40 – 95%
OMA 3 – Continuous monitoring			37/40 – 93%
OMA 4 – Quality assurance			23/30 – 77%
		OVERALL SCORE	118/135– 87%
OVERALL SITE ASSESSMENT COMMENTS			Letter
			Variation
			Enforcement

Pilgrim Lamb UK Ltd has an appropriate and well-structured system in place to ensure that the requirements for water monitoring as set out in their permit conditions are met and achieved.

There is an EMS in place which has dedicated polices and procedures for the monitoring requirements of the permit, as well as a well defined organisational structure for the monitoring programme which includes contingencies where required.

All personnel involved in the production of valid and correct environmental data are properly trained and resourced. Training records are kept up to date.

The compliance samples are undertaken by an external laboratory (ALS) which is MCERTS accredited and in line with the requirements of the permit.

In-house daily analysis of pH and ammonia appear to be carried out in accordance with the relevant methods and standards. Calibration and maintenance of the equipment used was adequate and traceable through the evidence provided.

For the continuous monitoring systems (CEMS) on site (flow meter) this is MCERTS accredited and there are adequate provisions for monitoring and location suitability. The meter is calibrated and audited annually. The measurement methods and standards are appropriate, and calibration and maintenance are carried out routinely.

Please refer to each section below for some minor recommendations where stated.

Date of audit: 5/6th May 2026
Signed: R. Prichard
Date: 07th May 2026

OMA 1: Management of monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Documentation of management system procedures for monitoring	4	Effective and well written (also includes useful photographs where necessary) monitoring procedures in place. Procedures are formally issued to relevant personnel and controlled in an appropriate environmental management system
B. Organisational structure for monitoring	5	The management structure is well defined and formally documented in EM01-006, which was last issued on 27/02/26 for pages 1&2, and 29/11/22 for pages 3 – 9. Posts are clearly identified. Resource is available for monitoring and contingenices have been considered.
C. Schedules and planning of monitoring, including contingencies	5	EM03-016 Daily calibration form covers recording of samples. Ammonia and pH testing carried out daily in-house, and ALS undertake a monthly compliance sample analysis. EM02-025 Effluent daily sampling procedure incl. pH and Ammonia. Trigger levels for breaches, and corrective action required. ALS external lab provide bottles for samples.
D. Monitoring records and use of monitoring data	2	Monitoring results are only assessed against an emission limit value to ensure compliance. No evidence of Trend Analysis was submitted apart from an effluent volume chart with no context for its potential use in making improvements to minimise emissions or environmental impact. RECOMMENDATION: 1. Review the results and compliance with permitted emission limits as a standing item on the agenda of operator Environmental Committee meetings and minute the findings as per MCERTS Manual EM 01-007 Verification (4.13). 2. Review of results even if consistently below permitted emission limits. 3. Trend-plot analysis of daily pH and ammonia results as well as other monthly determinands.

E. Understanding the requirements of the permit and monitoring methods	4	The operators demonstrated a comprehensive understanding of the monitoring conditions in the permit, including methods, accreditation and certification. Training is mentioned in EM 01-006 for the required competencies and capabilities, but no training plan was submitted. Mcerts training certificates were submitted for relevant personnel, and all were still in date.
OMA 1 – SCORE	20/25	

SUMMARY COMMENTS FOR OMA 1

Pilgrim Lamb UK has shown a good understanding of the requirements set out by the environmental permit and the monitoring methods to achieve compliance. Documentation is well defined, including the operators structures, roles and responsibilities. On the documents submitted, it is worth noting that within OMA 1D, the same recommendations from the previous assessment undertaken in 2021, do not seem to have been addressed.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Sampling provisions	4	The sampling facilities enable representative samples to be taken without deviation. The sampling facilities appear suitable.
B. Certification of equipment	5	Calibration certificates for ammonia testing and pH testing meters were submitted, with calibration certificates issued on 20/04/26 and 22/04/26 respectively.
C. Measurement methods and standards	5	Inhouse sampling is undertaken daily for Ammonia and pH. EM 02-022 and EM 02-23 documents cover the correct sampling procedures. Monthly compliance sample is undertaken by ALS (external Mcert accredited lab).
D. Calibration methods	5	In house testing for ammonia and pH has calibration procedures in place which are well documented as above. In house equipment is sent away on an annual basis to manufacturer for calibration. Calibration dates checked for pH 4,7 and 10 buffer solutions and all are in date. Compliance samples are analysed at ALS which is an Mcert accredited laboratory. Documentation provided to operator to demonstrate still accredited. Copy of Mcert ALS Certificate provided and has an issue date of 26/02/2026.
E. Frequency of maintenance and calibration	5	Calibration for inhouse equipment carried out annually by the manufacturer and up to date certificates were supplied. Spares are available for Hand-held ammonia meter and pH meter. Piranha CMMS Maintenance system – maintenance is scheduled onto the system and notifications are provided when the work is due. Site Services – responsible for the whole site including the ETP in relation to maintenance.

F. Reliability of methods and equipment (data availability)	5	In house equipment appears reliable and repeat sampling and analysis does not occur often. Compliance sample is undertaken by external lab and therefore has a high level of reliability
G. Breakdown response	4	Contract in place if spares are required for in house lab. Calibration carried out annually externally on in-house equipment.
H. Traceability	5	In-house calibration done to a traceable standard by the manufacturers of the equipment. Certification provided for buffer solutions.
OMA 2 – SCORE	38/40	

SUMMARY COMMENTS FOR OMA 2

Pilgrim Lamb UK Ltd has an in-house laboratory where daily pH and ammonia samples are analysed. A monthly sample is also sent externally to ALS which is an MCERTS accredited lab and analysed as the compliance sample in line with permit requirements.
During the audit, Pilgrim Lamb UK were able to demonstrate that the quality of the monitoring data for the inhouse pH and ammonia was achieved by appropriate sampling provisions and equipment.
Compliance sample is undertaken by ALS and documentation is provided to demonstrate this to Pilgrim Lamb UK.

OMA 3: Continuous monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Provisions for monitoring and location of continuous monitors	4	The sampling facilities enable representative samples to be taken.
B. Certification of continuous monitoring	5	All the continuous monitors are MCERTS certified for the relevant determinands(flow) and ranges. The operator has procedures in place to ensure new monitoring equipment is MCERTS certified, where available.
C. Do not assess for air, water only	5	The relevant methods are complied with in full. The monitoring techniques are specific to the determinand of interest with no significant interference from other species or sensitivity to any process parameter. The operator has a formal review process.
D. Calibration methods	5	Effluent monitoring - CWMs are calibrated to a high standard. There are external verification checks Mcert calibration carried our annually and serviced annually Mcert Flow Management Audit also carried out annually as well as a 5-year site service inspection.
E. Frequency of maintenance and calibration	5	The frequency of maintenance and calibration gives an added degree of confidence for the type of equipment. CEMS calibration has been carried out under MCERTS accreditation
F. Reliability of equipment (data availability)	5	Equipment is very reliable. For continuous monitors, valid results are produced more than 98% of the available time. For WI / LCP CEMS, there have been less than 10 invalid days.

G. Breakdown response	3	Siemens are mentioned in EM 03 – 013 in relation to the site CEMS flow meter. They are the unit manufacturer and it is calibrated and serviced by them. Nothing mentioned about breakdown response arrangements for this unit, although maintenance for relevant equipment is scheduled onto Pirahna system.
H. Traceability	5	Calibration and auditing carried out by external Mcerts accredited company.
OMA 3 – SCORE	37/40	

SUMMARY COMMENTS FOR OMA 3

Pilgrim Lamb UK Ltd has demonstrated that regular and appropriate calibration and maintenance is undertaken on the flow meter in line with permit requirement regarding MCERTS accreditation.
The provisions for monitoring and location of the continuous monitoring are appropriate and the equipment is audited annually and a site service inspection carried out every 5 years.
There are appropriate measurement methods and standards in place, including calibration. The frequency of maintenance and calibration has been demonstrated to be appropriate. The equipment is reliable, and there are measures in place for breakdown although nothing specific for the MCERTS Flow Meter.

OMA 4: Quality assurance		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. External quality control schemes	3	3rd party sampling and analysis activities are UKAS/MCERTS accredited, where available. The organisation carrying out monitoring participates in an inter-laboratory proficiency testing scheme or other external quality control activities. Root cause analysis of failures is undertaken and acted upon.
B. Internal data QC	4	The operator reviews data for its validity but does not employ any rigorous checks for data integrity. The organisation carries out QC procedures where appropriate and records the results, but the assessment of data could be more rigorous.
C. Competence of monitoring personnel	5	Sampling and analysis personnel have the appropriate level of training, qualifications and experience. Training records are comprehensive. There is a comprehensive monitoring training plan or procedure. For in-house sampling, there is more than one appropriately MCERTS certified person.
D. Auditing of monitoring	3	An Audit and Document Review Form EM 03 – 013 was submitted for the MCERTS Management System with an Issue Number 3, dated 12/12/22. The itemised contents seem to be dated to 2022, yet the document header has a Date for audit/review as 02/03/25 with a Report Issue date of 10/03/25. RECOMMENDATION: 1. If sufficient quality audits have been undertaken since 2022, a representative sample should be submitted for review. 2. If 02/03/25 was the last review of the MCERTS Management System, the correct issue number and date are required to reflect this along with up to date itemised contents.

E. Audit compliance	3	Audit records are available but could be improved. Where audits show non-compliances, the reasons have been investigated and appropriate corrective actions have been implemented in most cases.
F. Reporting	5	The contents of the permit return meets the permit requirements There is a laboratory analytical report for water samples produced by an accredited organisation. It has an analytical uncertainty associated with the results.
OMA 4 – SCORE	23/30	

SUMMARY COMMENTS FOR OMA 4
Pilgrim Lamb UK Ltd use an external lab (ALS) which is accredited for all the relevant determinands. Daily samples for pH and Ammonia are also tested on site at an in-house laboratory. The personnel on site have adequate training demonstrated in training records, as well as MCERTS training. The monitoring returns forwarded to NRW include all the relevant information as required under the permit.