



Agricultural Benefit Statement (ABS)

- **This Statement is Prepared and made by:**

Dated: 24/04/2026

Peter Llewellyn (on behalf of Puffin Produce Ltd), and;
Jack Davies (Field services agronomist).

- **Qualifications:**

Peter Llewellyn: CIWM WAMITAB – 14 years facilities management at Puffin Produce.

Jack Davies: BASIS Qualified – 7 years within the agricultural agronomy sector. (BASIS reg no – 20095600)

- **This Statement is being made for:**

A **Landspredding Deployment Application** for approval by **Natural Resources Wales** under an Environmental Permit, number: **EPR/DB3592ZM**.

1.1 Farm Details including Postcode:

Puffin Produce Ltd

Clarborough Farm, Haverfordwest,

Pembrokeshire,

SA62 4PB

Environmental Permit: SR 2010 No.4, 30/06/2025

Permit Number: EPR/DB3592ZM

Note. **Puffin Produce** are the Landowner, **Pembrokeshire Creamery** are the Waste generator and the Site of Production.

1.2 Where the waste is to be spread?

- **Farm Address:**

Clarborough Farm,

Haverfordwest,

Pembrokeshire

SA62 4PB

- **Stockpile grid reference:**

SM 95867 18028 Storage Tank(s) on the Site of Production at **Pembrokeshire Creamery**.

There will be no stockpiles or storage on the site of Deployment / Landspreading.

- **Area of the receiving land:**

33ha – Field areas total 49ha total but excluding no spread zones as denoted in the map below, we will only be utilizing 33ha.

- **Quantity to be stored at any one time?**

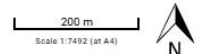
None, No Storage at or on the Site of Deployment / Spreading.

- **Location maps showing the field and receptors.**

Figure 1 - Locations of the field and receptors.



Produced on Land App, Jan 28, 2026.
© OpenStreetMap contributors



1.3 What is the waste to be spread?:

EWC code: 020501

Waste description: biodegradable materials unsuitable for consumption or processing.

- **Additional information:**

These washwaters are created from cleaning empty milk silos, the resultant wash waters have then been treated through our on-site treatment systems (DAF plant), where the unsuitable sludge & solids have been removed and taken away by a licenced waste carrier for disposal. The recovered wash waters can then be utilised beneficially and safely in their authorised and controlled deployment in spreading these aqueous liquid washings to land to confer agricultural benefit.

1.4 Operational details

- **Current Crop** – Grass silage (3 cuts) with a projected yield of 47t/ha from three cuts at 25%DM.
- **Is the straw removed?** – Yes – 3 cuts
- **When do you intend to apply this waste?:**

Spreading is to take place predominantly between cuts as well as spread on the growing crop. This will reduce surface and compaction damage caused by the field operations. The material will be spread via slurry tanker and splash plate. Injection/dribble bars will be considered if the application deems it suitable. Spreading this material on the stubble as well as the actively growing crop will reduce volatilisation, nutrient loss, odour and surface runoff. Little to no cultivations are employed within the rotation apart from targeted cultivations to relieve undue compaction in tramlines/gateways. No spreading will however be taking place in these areas to avoid surface runoff from compacted areas.

- **How is the waste to be stored?:**

The waste will not be stored at the site of deployment or use, it will only spread on land at the time of demand.

- **Where is the waste to be stored prior to spreading?:**

The generation, source and storage of the waste is at this location SM 95867 18026 Storage Tank(s) at the Site of Production.

- **Why was this storage location chosen?:**

BPEO -> Secure and fully contained and controlled storage tank(s) at the Site of Production.

- **How do you plan to incorporate the waste following application?:**

The waste will be spread on an actively growing crop therefore incorporation will not be taking place.

No requirements for Mole draining/subsoiling on this land as crops have already been established.

1.5 Compliance with NVZ requirements:

- **Does the site fall within a designated NVZ?:**

Yes

- **Do closed periods apply for waste type?:**

Yes

We are aware of the closed periods enforced by the Water Resources control of Agricultural pollution regulations 2021 between September and January. Spreading during the closed periods will not take place.

- **Will application rates comply with crop requirement and field/whole farm limit?:**

Yes, see fertiliser plan below.

- **Have other organic waste/manure applications been taken into account?:**

Yes, there are no other organics manure applications taking place.

- **Has adequate justification been included to cover NVZ requirements?:**

Yes, as referred to in the Welsh Government's Water protection (SMR 1) (2024) document

- **Has information for the landowners recording requirements been provided?:**

Yes

Puffin Produce Ltd are also the landowner, and we shall keep all records, plans and management documents required to be kept and maintained under our Environmental Permit and Landspreading Deployment Authorisation, in addition to our records for Rural Payments Wales.

1.6 Benefits of Applying this Material to a Crop of Benefits for a crop of silage (3 cuts):

Recovering this material and applying it to the field at Clarborough farm would result in several benefits to a 3 cuts silage system. The material would supply a healthy application of Nitrogen offering a strong support to the first cut and aids regrowth for second and third cuts.

The Potash content of the material applied covers the offtake from cutting the silage crop and will help to maintain the K indices and improves the drought tolerance and regrowth speed of the crop.

The Sulphur content fulfils the crop requirement meaning that no additional bagged sulphur is required and improves the N use efficiency of the crop.

The Calcium and magnesium content of the material will help counteract soil acidity and will help improve growth consistency.

Please see below the fertiliser recommendation stating the nutrient additions and the quantity to be spread on each field:

Soil Analysis Results and Fertiliser Recommendations 2026																
21/02/2025		Stephen Mathias		Puffin Produce Limited												
		07712 300092		BASIS RE/3446/P				FACTS FE/1880								
Clarborough Farm																
				to convert to units/acre multiply by 0.8												
				Likely					Manure				Total SNS Calculation			
				yield	Nutrient Indices				Contribution (Kg/Ha)							
Field	Acs	Crop	t/ac	pH	P ₂ O ₅	K ₂ O	MgO	N	P	K	OM%	kg/ha				
Upper Cotts	10.7	Silage (3 cuts)	19	6.2	2+	2-	3.0	153	18	159		280				
Bungalow Paddock	2.97	Silage (3 cuts)	19	6.1	2-	2-	3.0	153	18	159		280				
Above Bungalow	7.35	Silage (3 cuts)	19	6.5	2-	3	3.0	77	8	90		280				
Middle Cotts	13.6	Silage (3 cuts)	19	7	3	2+	3.0	153	18	159		280				
Gold Mine	9.89	Silage (3 cuts)	19	5.6	3	2+	2+	153	18	159		280				
Triangle Yard	3.02	Silage (3 cuts)	19	6.8	1	2-	2+	153	18	159		280				
Lower Cotts	15.9	Silage (3 cuts)	19	6.5	3	2-	3.0	153	18	159		280				
Front Field	17.3	Silage (3 cuts)	19	6.1	1	4	3.0	0	0	0		280				
Bottom Field	6	Silage (3 cuts)	19	5.9	1	1	2+	235	28	244		280				
Total (Acs)	86.6															
Products to Use																
Liquid Washings		83m3 supplying 117kg of N, 4.46kg of P, 13.46kg of K														





Figure 2 A buffer of 55.14m is in place between the ancient woodland to the East of front field.

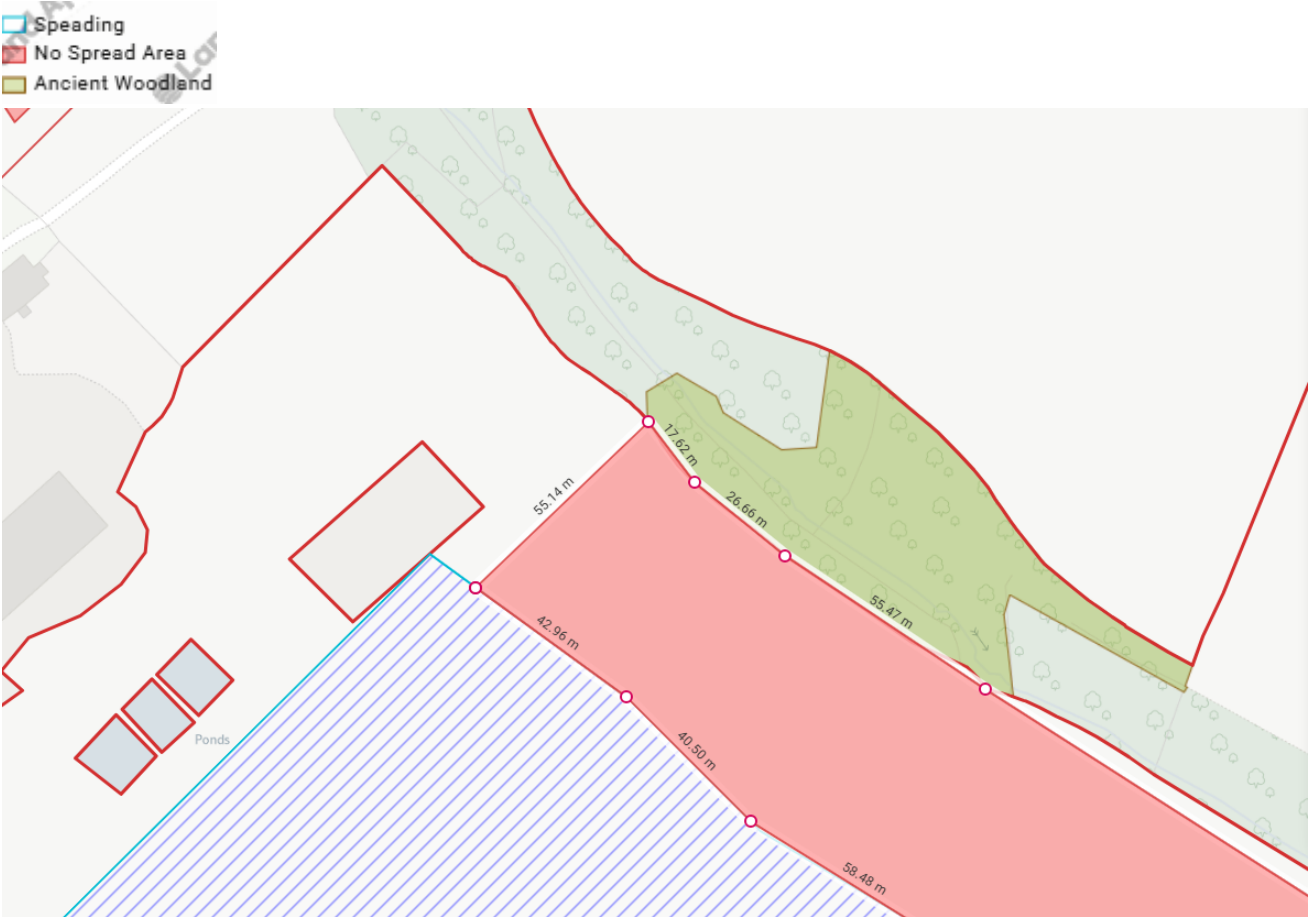
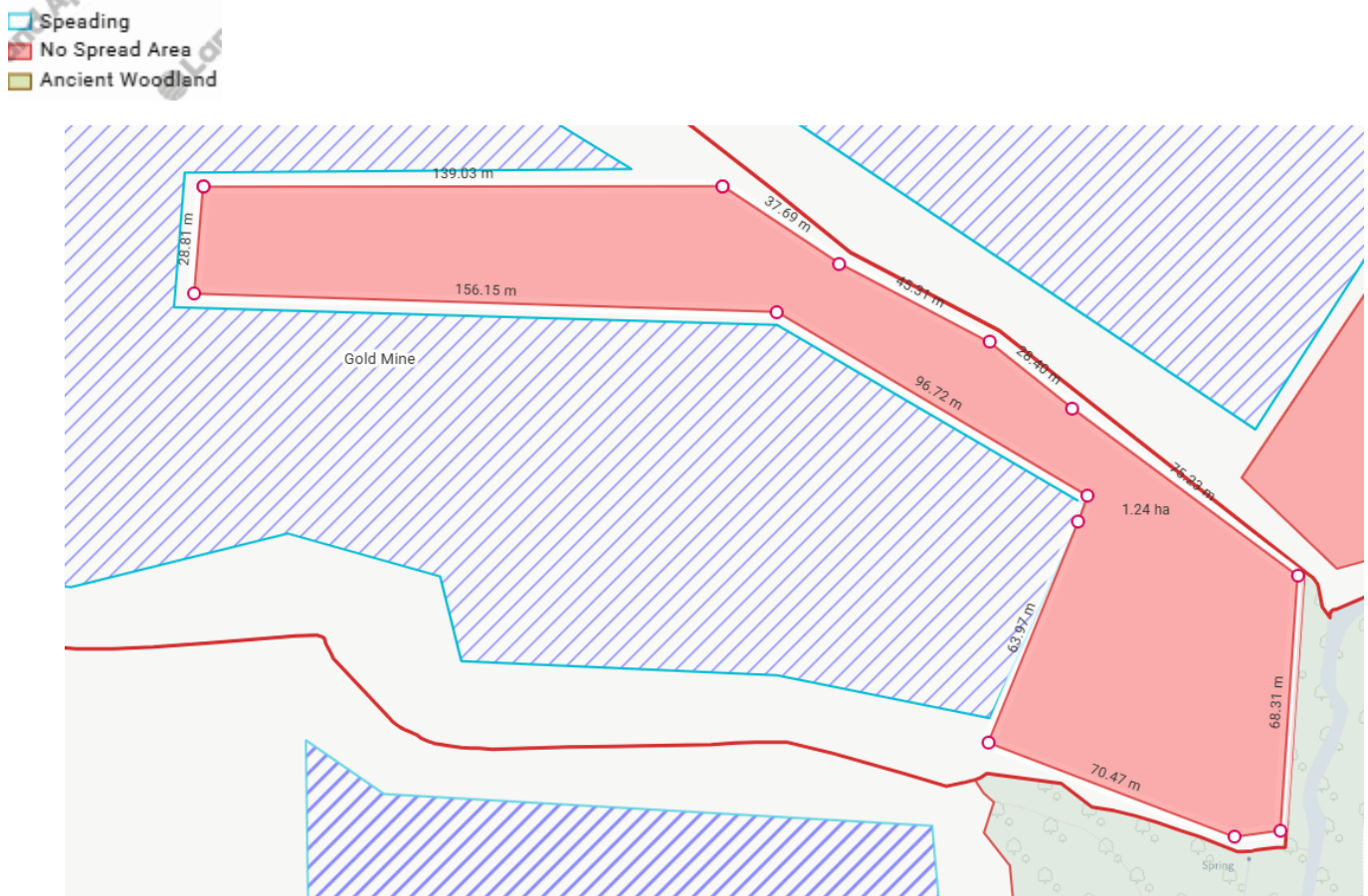


Figure 3 50.31m Buffer to the west of Triangle Yard.



Figure 4 70.47m Buffer between Gold mine and the springs to the Southeast.



1.9 Practices to reduce the impacts of the operation on identified sensitive receptors.

- **Reducing the potential for spray drift and other detrimental impacts from the spreading operation:**
 - Spreading will only be undertaken when weather and grown conditions are suitable. Spreading operations and times will be determined by and directed to the machinery operator by the company Field Operations Manager.
 - Spreading restrictions within the Code of Good Agricultural for the Protection of Water Soil and Air for Wales will be adhered to.
 - Spreading operations will not commence if heavy rain is falling or is forecasted within the next 48 hours.
 - Spreading operations will only commence when soil temperatures are consistently above 6 °C.
 - Buffer strips keeping any operations at least 20 metres from receptors.
 - Machinery operations will take account of soil conditions, slope etc. Turns will be gentle to avoid rutting and wheel slip.
 - Filling the tanker will be via a dedicated fill station with facilities and procedures in place to prevent spillages. Filling will take place at Pembrokeshire Creamery, where the filling station is bunded and spill kits are located. All staff filling the tankers are fully trained in operating the equipment and are aware of the correct procedures if a spill where to take place.
 - Soil depth is greater than 400mm over a clay/mud subsoil, therefore, infiltration to groundwater is not deemed as high risk.

- Odour Assessments made of the Washwaters to be utilised show that Odour generation from spreading is not likely, Odour monitoring (See Odour Assessment and Record Form) will be taking place At the site of production prior to spreading, and olfactory checks will be made by Operational Staff during spreading operations.
- Spreading will be even and at an application rate designed to allow infiltration to soil and avoid ponding.
- Operational Plant and Machinery will be checked daily by the Machine Operator.
- All machinery is regularly serviced and spreading equipment is calibrated, all maintenance records are kept.
- Machinery turns will not be executed in the buffer strips.

2.0 Contingency planning.

- **Machinery breakdown:** We have a fleet of tractors and tankers available in the event of breakdown which can undertake the spreading operation.
- **Staffing problems due to sickness, holidays etc** – Staff undertaking the spreading will work on a rota and we have a pool of drivers available from our farming operation to take over in the event of sickness/holidays.
- **Prolonged adverse weather** – spreading operations will not take place during heavy rain, if heavy rain is imminent, in high winds or if ground is frozen or snow is present as defined in the Code of Good agricultural practice.

Met Office Weather Alerts via e-mail are subscribed to by the Company, and Real Time Weather Conditions and Forecasts are monitored using **Windy.com** website <https://www.windy.com> and Mobile App <https://play.google.com/store/search?q=windy.com+official+app&c=apps> by the Operations Manager.

- **Waste storage measures in the event of prolonged storage.** If waste will need to be stored during adverse weather, we will utilise our additional capacity storage tanks at our factory if needed in the form of mobile nurse tanks to store the liquid until conditions improve.