

Compliance Assessment Report CAR_NRW0052513

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: Site Inspection,

Reason: Routine.

On: 28/05/2026 between 10:30 and 14:15.

Parts of permit assessed: See Section 4.

NRW Lead Officer: Benjamin Taylor, accompanied by Michael Launder.

Report sent to: Compliance Manager, United Petfoods (UK) Ltd, on 30/07/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(3) - Installations - Emissions and monitoring - Emissions to land	C2 Significant	Permit condition 3.1.1
IR1A - Installations - Management - General Management	C2 Significant	Permit condition 1.1.1.
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR3A(3) - Installations - Emissions and monitoring - Emissions to land	C3 Minor	Permit condition 3.1.1
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
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
3	66

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(3)	CAR_NRW0052513.A1: United Petfoods (UK) Ltd is to continue implementing the ETP Improvement Programme. In the interim, all unauthorised discharges to ground arising from leaking assets associated with the ETP works area must be prevented immediately.	30/07/2026
IR1A	CAR_NRW0052513.A2: Once United Petfoods (UK) Ltd has confirmed the ETP process to be implemented, they are required to develop and begin a robust planned preventative maintenance programme (PPMP), in line with manufacturers guidelines. This programme should be designed to ensure the effective function of the ETP and to prevent future losses to ground and/or controlled waters. This PPMP must be submitted to NRW as part of the site operating techniques.	31/12/2026
IR3B	CAR_NRW0052513.A3: United Petfoods (UK) Ltd shall submit to NRW a Gap Closure Plan detailing how Primary, Secondary and Tertiary Containment will be provided for all leaking tanks, un-bunded operational assets and associated pipework within the ETP works area.	31/12/2026
IR3A(3)	CAR_NRW0052513.A4: United Petfoods (UK) Ltd must proceed with Phase 1 of the proposed ETP Improvement Programme, as detailed within Ritetrak – ETP Proposal – May 2026, and also communicated to NRW on the day of inspection. These works should be undertaken without delay, with NRW kept regularly informed of progress throughout.	31/12/2026
IR3B	CAR_NRW0052513.A5: United Petfoods (UK) Ltd is to seek to install protective covers on the existing IBC sump pallets or replace the current sump pallets with units that have protective covers incorporated already. Once completed, evidence is to be submitted to NRW. Should United Petfoods (UK) Ltd decide not to proceed with encapsulated sump pallets, then they are to submit to NRW evidence that they have taken appropriate measures to address environmental concerns for review.	11/09/2026
IR3E	CAR_NRW0052513.A6: United Petfoods (UK) Ltd is to ensure that appropriate measures are in place to maintain samples awaiting courier collection within the optimal temperature range required to prevent sample degradation.	14/08/2026

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) relates to the review of the *Wastewater Treatment Works Structures Structural Inspection Report* (reference: 260118-PEB-01-ZZ-C-R-2001-A), along with the subsequent Site Inspection on the 28th of May 2026. This CAR is in reference to the United Petfoods (UK) Ltd (the Operator) at their Llangadog Site, which operates under permit EPR/CB3091HY.

Scope

The site inspection was a pre-arranged visit to discuss the findings of the *Wastewater Treatment Works Structures Structural Inspection Report* alongside a physical inspection of the Effluent Treatment Plant (ETP) works area, chemical storage area, and on-site laboratory. The agenda for the visit comprised the following:

- Opening Meeting
 - Overview of Outstanding Actions and Improvement Conditions
 - Variation Application Update
 - NRW Update on the Package Treatment Plant Application Direction
 - Effluent Treatment Plant (ETP) Condition and Secondary Containment Overview
- Site Walkover
 - Effluent Treatment Plant Works Area Inspection
 - Autosamplers Overview and Familiarisation
 - Chemical Storage Area
 - Detritus Pit
 - In-house Laboratory Familiarisation
- Closing Meeting

Prior to the visit, the following reports and documents were submitted by United Petfoods (UK) Ltd and were subsequently reviewed by NRW:

- *Wastewater Treatment Works Structures Structural Inspection Report* (reference: 260118-PEB-01-ZZ-C-R-2001-A)
- *Pebble Report Action Plan March 2026*

ETP Structural Assessment

On the 19th of May 2026, United Petfoods (UK) Ltd submitted the above documents pertaining to the structural condition of their onsite ETP. These documents were provided to satisfy actions outlined within a previous CAR form (reference: CAR_NRW0048882). Extracts from actions CAR_NRW0048882.A5 and CAR_NRW0048882.A7 are provided below:

CAR_NRW0048882.A5 (action completed):

- *United Petfoods (UK) Ltd is to undertake a structural assessment of all ETP assets using a suitably competent contractor in order to ascertain the condition and integrity of all effluent bearing vessels and transfer systems. The conclusions of this assessment is then to be submitted to NRW.*

CAR_NRW0048882.A7 (action completed):

- *United Petfoods (UK) Ltd is to investigate the structural integrity of the Detritus Pit and Reception Pit. All internal structural walls and components associated with the assets must be cleaned and foreign material removed to facilitate a full inspection by a suitably competent contractor, a report will need to be generated and is to be submitted to NRW as evidence.*

These documents were reviewed by NRW in preparation for the site visit scheduled for the 28th of May 2026. The review identified that a number of assets associated with the onsite ETP were exhibiting significant signs of deterioration, including instances where key assets were considered to be at, or approaching, the end of their serviceable life. A brief overview focusing primarily on leakage pathways is extracted below:

Detritus Pit

- The structure is in generally poor condition.
- Continued use is likely to result in further sectional loss, reducing the structure's load-bearing capacity over time.

Lubek Tank

- Several defects were identified, including hairline cracking to the walls and localised water ingress through cracks and construction joints.
- A number of cracks exceeding 0.2mm in the base slab were observed to be leaking, providing a credible (albeit minor flow) pathway for contents to migrate into the surrounding subsoil.

DAF Unit and Containment

- Localised cracking was identified in the slab beneath the unit, which may provide a leakage pathway from the containment area.
- Secondary containment was considered insufficient (e.g. in terms of watertightness and reinforcement).

Filter Bed

- The structure was assessed to be in poor condition overall.
- Numerous significant defects were identified, including cracking, delamination, spalling, exposed reinforcement, distortion, and loose steelwork.
- The filter bed is considered to have reached the end of its serviceable life, with required repairs likely to be uneconomical.

Clarifiers

- Both clarifiers were assessed to be in poor condition, with defects including persistent leakage and corrosion to the steel structure.
- Observed cracking indicates that the base slab may have been overloaded.
- No secondary containment was present.

Concrete Channels

- A 1mm wide crack and a 200mm deep void were identified, which could provide a pathway for leakage into the surrounding subsoil

Whilst the above defects may be consistent with the age of the ETP, which NRW understands to be between 50 – 60 years old, NRW considers that the scale of deterioration observed across the majority of the assets is indicative of potentially chronic maintenance deficiencies.

For example, as previously outlined in CAR_NRW0048882 following onsite discussions during the May 2025 visit, it was unclear to NRW whether an integrity inspection of the Detritus Pit and Reception Pit had ever been undertaken, or when these assets were previously emptied. This suggests that United Petfoods (UK) Ltd lack a proactive inspection programme designed to ensure asset functionality and prevent unauthorised discharges to ground. This is a fundamental process in preventing harm to the environment, and if not already in place, then United Petfoods (UK) Ltd must urgently develop and implement a sufficient routine planned preventive maintenance programme (PMPP) .

It is the understanding of NRW that on the basis of the conclusions of this report, United Petfoods (UK) Ltd is seeking to undertake a phased upgrade to the existing ETP, this improvement is welcomed by NRW. United Petfoods (UK) also provided a summary (*Pebble Report Action Plan March 2026*) outlining the current status of their proposals. Further details regarding this upgrade

will be discussed within a later section of this CAR form.

Compliance:

Permit condition 3.1.1 specifies:

'There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1 and S3.2.'

Following review of *Wastewater Treatment Works Structures Structural Inspection Report*, it was apparent that there were numerous unauthorised discharges of potentially polluting liquid to ground from leaks detailed above. This is a clear contravention of permit condition 3.1.1, and consequently due to the number of losses identified, a non-compliance score of C2 has been allocated under compliance criterion IR3A(3) – Emissions to land.

Action:

United Petfoods (UK) Ltd is to continue implementing the ETP Improvement Programme. In the interim, all unauthorised discharges to ground arising from leaking assets associated with the ETP works area must be prevented immediately.

Permit condition 1.1.1 below 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 '*

As outlined above, NRW considers that these losses can be attributed to an insufficient maintenance programme on assets associated with the ETP. This is a contravention of the stipulations specified by permit condition 1.1.1, and consequently a non-compliance score of C2 has also been attributed under compliance criterion IR1A – General Management.

Action:

Once United Petfoods (UK) Ltd has confirmed the ETP process to be implemented, they are required to develop and begin a robust planned preventative maintenance programme (PPMP), in line with manufacturers guidelines. This programme should be designed to ensure the effective function of the ETP and to prevent future losses to ground and/or controlled waters. This PPMP must be submitted to NRW as part of the site operating techniques.

Site Inspection – 28th of May 2026

Opening Meeting

NRW Officers arrived onsite at 10:30 and were met by representatives of United Petfoods (UK) Ltd. The visit began with an opening meeting, where items from the prearranged agenda were presented to NRW and discussed:

Overview of Outstanding Actions and Improvement Conditions

- United Petfoods (UK) Ltd are currently in dialogue with a third-party supplier regarding the installation of a pH probe, this is to facilitate them in satisfying the continuous monitoring requirement that is specified within *Schedule 3(b): Table S3.2* (see CAR_NRW0051654).
- The first round of permit requirement training has been delivered by United Petfoods (UK) Ltd's consultants (ECL). This training was designed for key personnel involved in environmental management and permit compliance. NRW were informed that a second round is scheduled to be delivered by ECL in due course.
 - Additionally, NRW were informed that ECL will provide targeted, individual training to the member of personnel primarily responsible for maintaining permit compliance at the Llangadog site.
- United Petfoods (UK) Ltd outlined an improvement to their Schedule 5 notifications process, which involved removing reliance on specific individuals. This change aims to enhance the level of detail captured when identifying the root cause of permit exceedances.
- Whilst discussing recent improvements in compliance with Maximum Daily Discharge Volume, NRW were informed that tray line production is no longer undertaken onsite. This was due to failure of the production line, which was subsequently deemed uneconomical to repair. Removal of this process has resulted in a significant reduction in the volume of retort water generated during product cooking/cooling.
 - Additionally, United Petfoods (UK) Ltd attributed these improvements to enhanced training for ETP operatives and improved working practices, including placing the ETP into recirculation when the site is approaching its 1,000 m³ limit.
- Given the potential alterations to the ETP process, it was agreed onsite that the satisfaction of the outstanding Improvement Conditions (IC1, IC4 & IC6) should be put on hold until United Petfoods (UK) Ltd implements their ETP improvement programme.

Variation Application Update

- ECL has progressed with the variation application, with Site Plans provided and H1 Assessment on the boiler completed.
- United Petfoods (UK) must continue with the application and ensure it is submitted as soon as possible.

Effluent Treatment Plant (ETP) Condition and Secondary Containment Overview

- In order to facilitate discussions surrounding the ETP, its condition and proposed improvements, United Petfoods (UK) Ltd commissioned Ritetrak to be in attendance for the visit.
- In line with the conclusions and recommendations detailed within the Structural Assessment Report (see Section above), United Petfoods (UK) Ltd is proposing to upgrade their existing ETP.
- Primary challenge for the upgrade is to implement a biological system which can handle low COD loadings and significant variations in flow rate.
- Due to the nature of the effluent (i.e. low sugar content), Ritetrak outlined that the biggest vulnerability for the process is meeting the Total Nitrogen compliance limit of 20mg/l.
- United Petfoods (UK) Ltd specified that future-proofing of the ETP is a key priority as part of the proposed upgrade. This will ensure that the implemented system can accommodate changes in onsite production (e.g. increases in volume).
 - **Please note:** any alteration to onsite production (i.e. increases over the permitted 180.24 tonnes of finished product per day) may be subject to a permit variation application and must be considered ahead of any production or process changes.
- Ritetrak on behalf of the Operator is proposing a phased approach to the ETP upgrade, which is to be developed following a prolonged and detailed design stage; informed by the chemistry of the effluent. As part of this approach, the ETP was modularised as follows:
 - Module 1: Course Filtration, Rotary Sieve
 - Module 2: Equalisation Tank
 - Module 3: Upgrading the DAF Bunding
 - Module 4 – Balance Tank
 - Module 5 – Biological System
 - Module 6 – x2 Lamellae Clarifiers
- During the visit, NRW were provided with a report (*Ritetrak - ETP Proposal - May 2026*) which provided additional detail on each of the different modules.
- NRW understands that United Petfoods (UK) Ltd is planning to implement Modules 1 and 6 in the short to medium term, which are considered by Ritetrak likely to deliver significant benefits with relatively low initial capital expenditure.
- Following completion, data will be collected and used to inform the subsequent stages of the ETP upgrade project.

Site Observations

The Site Walkover component of the visit commenced at 11:30, NRW Officers attended the different areas that were listed within the pre-arranged agenda.

Detritus Pit



Image 1: View of the Detritus Pit

The inspection began at the Detritus Pit, where NRW Officers observed the asset from the surface. Currently, there is no screening mechanism in place to remove larger organic particulates from the effluent flow at these early stages. As a result, an accumulation of organic deposits has quickly returned to the effluent's surface following the structural assessment early this calendar year.

NRW were informed that Module 1 of the proposed ETP upgrade will see the Detritus Pit become obsolete. The proposal states that crude effluent will instead be collected into a purpose-built, bunded balance tank which feeds into a rotary sieve. The filtered solids will be collected via gravity into a storage vessel (e.g. dolav or tipping skip).

NRW questioned the potential for odour generation arising from extended storage of organic rich material. In response, United Petfoods (UK) Ltd outlined that in order to mitigate any odour risk, the material would be stored internally within the onsite freezers prior to transport offsite as Category 3 Material.

Ritetrak claim within their report (*Ritetrak - ETP Proposal - May 2026*) that removal of these solids at the earliest stage would have the following benefits:

- Reduce the risk of blockage and damage to downstream ETP apparatus (i.e. jets, sprays, etc).
- Removal of particulates with the highest nitrogen loading (e.g. meat fragments, fines), which when present, are likely to hinder compliance with the Total Nitrogen limits specified by the EPR permit.

United Petfoods (UK) Ltd must look to implement these improvements, and ensure that NRW is kept up to date on their progress.

Effluent Treatment Plant Works Area Inspection



Image 2: DAF pipework extending beyond curtilage of partially bunded area

As highlighted in both Ritetrak's Report (*Ritetrak – ETP Proposal – May 2026*) and the Pebble Engineering Structural Assessment (*Wastewater Treatment Works Structures Structural Inspection Report*), the current containment measures associated with the DAF Plant are not in line with required standards (e.g. CIRIA C736). The existing arrangements comprise a combination of single-layer, unreinforced (presumed) concrete blockwork and a linear drainage channel designed to direct contaminated water to a sump.

During the inspection of the ETP works area, NRW officers observed what appeared to be a decanting pipe originating from the base of the DAF extending beyond the curtilage of the existing, partially bunded area. Additionally, this pipework appeared to be incorrectly supported by a stack of concrete blocks, increasing the likelihood of an accidental loss should these become dislodged.

While impermeable surfacing is present within this particular area of the ETP, NRW considers that the absence of kerbing around the perimeter presents a credible risk of contaminated liquids running off the pad and infiltrating the surrounding soil matrix in the eventuality of a loss, particularly if the existing containment measures (where present) were to become overwhelmed. Furthermore, the presence of pipework located outside the defined "contained" area further exacerbates this risk, with the pipe outlet situated in close proximity to permeable ground. NRW has previously expressed concerns regarding the proximity of the Afon Bran to the DAF Plant, which is situated meters from the edge of the impermeable surface associated with the ETP Works Area.



Image 3: Proximity of earth banking bordering the Afon Bran to the concrete blockwork wall associated with the DAF Plant.

Despite this proximity, United Petfoods (UK) Ltd maintained that they consider the risk to be acceptable, and that they have sufficient capacity to store the contents of the DAF Plant should a catastrophic failure occur. This is via reliance on drainage directing flows towards the Reception Pit. Additionally, they claim that the presence of earth banking directly adjacent to the edge of the watercourse serves as an additional containment measure. However, given the likely permeable nature of the earth banking, NRW considers there to be still a viable pathway into the adjacent watercourse (Afon Bran). It is important to highlight that NRW Officers observed a leakage from the primary vessel (DAF Unit) during the inspection which was contained within the curtilage of the partially bunded area.

NRW understands that Ritetrak has proposed improvements to the secondary containment measures associated with the DAF plant, alongside optimisation of the chemical addition control (Module 3 of *Ritetrak – ETP Proposal – May 2026*). However, United Petfoods (UK) Ltd indicated to NRW that they are exploring alternative in-house options (i.e. extending walls across the concrete plinth and improving drainage to the reception pit). It is essential that the chosen approach selected by United Petfoods (UK) Ltd is in line with the required standards for secondary containment (i.e. CIRIA C736). Failure to do so may result in additional improvements to be required in addition to what is already implemented by United Petfoods (UK) Ltd.

As previously highlighted, there is insufficient secondary containment for all assets associated with the ETP. Given that the ground surface within the ETP comprises a mixture of unmade ground and impermeable surfacing, there is a credible risk of contaminants migrating to ground (an ultimately to controlled waters) in the eventuality of a loss. This risk is substantiated by findings in the *Wastewater Treatment Works Structures – Structural Inspection Report*, which identifies that losses are already occurring from multiple assets (e.g. clarifiers and LUBEK). Additionally, the primary transfer pipework between the Detritus Pit and the Reception Pit is suspended across the Afon Bran presenting a significant risk for the direct entry of raw effluent directly to the tributary of the

specially designated (Afon Tywi).

An action was previously placed on United Petfoods (UK) Ltd (referenced CAR_NRW0048882.A6) requiring the Operator to “*undertake a secondary containment assessment (in line with CIRIA 736) using a competent third-party contractor for all tanks, sumps, bunds, pipes and containers.*”. Whilst there is reference to secondary containment within the structural report, it is unclear whether this action has been completed in its entirety. Following observations made on the day of the inspection, and discussions with United Petfoods (UK) Ltd representatives, it has been decided that this action will be superseded by the one detailed below.

Action:

United Petfoods (UK) Ltd shall submit to NRW a Gap Closure Plan detailing how Primary, Secondary and Tertiary Containment will be provided for all leaking tanks, un-bunded operational assets and associated pipework within the ETP works area.



Image 4 & 5: Losses noted beneath the Clarifiers.

During the inspection, NRW observed a number of losses from beneath the Clarifiers and auxiliary pipework, with very moisture conditions noted across the concrete pad beneath and surrounding soils suggesting a chronic issue. Whilst NRW was already aware of these losses from the Structural Report, since the visit, it has been noted that United Petfoods (UK) Ltd claim to have completed repairs on the assets within their *Pebble Report Action Plan March 2026* document submission.

Consequently, in light of the above, these observed failures are considered additional to those previously identified and scored within the ETP Structural Assessment Section. As a result, this constitutes a breach of permit condition 3.1.1, and a non-compliance score of C3 has been allocated against criteria IR3A(3) – Emissions to land.

Given the number of losses experienced by the Clarifiers and the lack of secondary containment provision, United Petfoods (UK) Ltd must, as a matter of urgency, replace the assets ensuring that they are in line with mandatory standards (i.e. secondary containment). As previously communicated, any changes to the permitted ETP process must be formally captured through a

permit variation, the determination of which rests entirely at the discretion of NRW's Permitting Team.

Action:

United Petfoods (UK) Ltd must proceed with Phase 1 of the proposed ETP Improvement Programme, as detailed within Ritetrak – ETP Proposal – May 2026, and also communicated to NRW on the day of inspection. These works should be undertaken without delay, with NRW kept regularly informed of progress throughout.

During the visit, Ritetrak advised NRW of their intention to undertake a full internal inspection of the LUBEK Tank. Should this inspection determine that the LUBEK Tank is in an acceptable condition, then United Petfoods (UK) Ltd intends to line the internal surfacing and install Landia pumps, with the aim of minimising losses and reducing odour generation.

Any report arising from this inspection must be submitted to NRW as supporting evidence in advance of any remedial actions being undertaken by United Petfoods (UK) Ltd.

As already outlined, the LUBEK tank, amongst other assets lacks secondary containment provisions. NRW communicated this to United Petfoods (UK) Ltd and were reassured that this is an area of work which is being looked at. The lack of secondary containment will not be compliance assessed at this time, however may form part of future inspections and consequently may be scored at a later date.

Autosamplers Overview and Familiarisation



Image 6: View of internal components of Hach Lange Bühler Autosampler

NRW Officers observed the Hach Lange Bühler Autosampler during the visit.

Following numerous exceedances of permitted emission limit values during routine monitoring, United Petfoods (UK) Ltd implemented an enhanced cleaning regime comprising daily and weekly

maintenance activities designed to prevent sample contamination.

Inspection of the autosampler indicated that the components and sampling vessel were all clean, suggesting that the enhanced procedure is being implemented. The Operator informed NRW that a white sampling vessel is deliberately used to make it easier to identify any contamination during routine visual inspections and cleaning activities.

To minimise sample degradation, the cabinet housing the sampling vessel is refrigerated, which slows microbial growth and chemical reactions. However, NRW was informed during the visit that the autosampler associated with the DAF outlet is not refrigerated. Although this is not a permitted monitoring point, United Petfoods (UK) Ltd should be mindful of this limitation if data from this autosampler is relied upon in the future.

Chemical Storage Area



Image 7: Ferric Chloride and Sodium Hydroxide (Caustic Soda) storage bunds

NRW Officers then inspected the chemical storage area, it was noted that there was a significant reduction in the quantities of stored chemicals compared to the previous visit in May 2025. United Petfoods (UK) Ltd outlined that stocks had been limited to reduce the amount of chemicals they need to manage in addition to reducing the overall environmental risk associated with their storage.

It was observed that IBCs containing ferric chloride and sodium hydroxide were stored on IBC sump pallets without protective covers. As a result, rainwater could accumulate within the containment system, reducing its effective storage capacity unless routinely removed by site personnel.

Furthermore, the absence of covers increases the risk of "jetting" if the vessel structure was punctured, potentially resulting in the release of polluting substances beyond the containment area. Given the location of these storage bunds, a loss of containment could result in polluting substances escaping beyond the site boundary into the adjacent unmade ground located to the rear of the storage vessels. This was communicated at the time by NRW Officers, in response United Petfoods (UK) Ltd outlined that they are looking into obtaining IBC storage bunds fitted with

rainwater covers.

Action:

United Petfoods (UK) Ltd is to seek to install protective covers on the existing IBC sump pallets or replace the current sump pallets with units that have protective covers incorporated already. Once completed, evidence is to be submitted to NRW. Should United Petfoods (UK) Ltd decide not to proceed with encapsulated sump pallets, then they are to submit to NRW evidence that they have taken appropriate measures to address environmental concerns for review.

In-house Laboratory Familiarisation

Ahead of a proposed Water Operator Monitoring Assessment (OMA), NRW Officers visited the onsite laboratory in order to gain a brief familiarisation. The onsite laboratory was of interest to NRW due to United Petfoods (UK) Ltd conducting majority of their daily compliance via in-house methods (as previously identified in CAR_NRW0050854). NRW has not compliance assessed the reliance on in-house methods at this time as this is planned to be the subject of the proposed OMA to be conducted in due course.

In response to a previous action (CAR_NRW0050854.A1), United Petfoods (UK) Ltd improved their in-house analytical methods for Total Nitrogen and Total Phosphorus monitoring, replacing tablet based test kits with reactor/vial based testing methods. NRW was informed that the reactor required to facilitate this enhanced testing regime is now onsite. Indicative tablets testing is still undertaken for a number of parameters for the benefit of the Operator (i.e. Aluminium, Nitrite, etc). United Petfoods (UK) Ltd is currently undertaking validation testing alongside DECUS to verify that the new methodology produces results that are comparable with those obtained through external laboratory analysis. In addition, NRW was informed that a spare Palintest Lumiso Photometer, which is a critical piece of equipment for the site's in-house monitoring programme, is retained on site as a contingency measure to ensure continuity of testing in the event of equipment failure.

However, United Petfoods (UK) Ltd advised NRW that samples awaiting courier collection are currently stored unrefrigerated within the reception area prior to being transported off site for external analysis. This presents a risk of sample degradation, particularly where there are delays between sample collection and courier collection, which could affect the accuracy and representativeness of analytical results.

United Petfoods (UK) Ltd should seek to ensure that samples are stored within the appropriate temperature range throughout the entire period between collection and dispatch. Appropriate refrigerated storage arrangements should be implemented where necessary to maintain sample integrity and minimise the potential for deterioration prior to external analysis.

Action:

United Petfoods (UK) Ltd is to ensure that appropriate measures are in place to maintain samples awaiting courier collection within the optimal temperature range required to prevent sample degradation.

Guidance: [Monitoring discharges to water: guidance on selecting a monitoring approach - GOV.UK](#)

The visit concluded with a brief closing meeting, where observations made over the course of the visit were summarised and communicated.

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.