Compliance Assessment Report for: CAR_NRW0053216

Permit number	CB3091HY	**Operator name**	United Petfood (UK) Ltd

Site name	Llangadog Pet Foods Plant
Site address	Tywi Valley Food Park, Station Road, Llangadog, SA19 9LY
Type of assessment	Report/Data Review

Date of assessment	08/05/2026	**Time in**	N/a	**Time out**	N/a

Parts of permit assessed	See Section 4.

NRW Lead officer	Benjamin Taylor	**Accompanied by**	N/a
Report sent to – Name and position	Compliance Manager, United Petfoods (UK) Ltd	**Date**	19/10/2026

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
IR1A - Management - General management	C1 Major	1.1.1
IR3A - Emission & Monitoring - Emissions to water, air or land	C3 Minor	3.1.2
IR3E - Emission and Monitoring - Monitoring	Action Only (X)	
IR4B - Information - Reporting	C2 Significant (6)	4.2.3b
IR4C - Information - Notification	C2 Significant (6)	4.3.1b

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

Total number of non-compliances recorded	Total non-compliance score
14	436

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?

Compliance Criteria	Action needed	Complete by
IR1A	**CAR_NRW0053216.A1** United Petfood (UK) Ltd is to confirm to NRW whether ECL has provided targeted, individual training to the member of personnel primarily responsible for maintaining permit compliance at the Llangadog Site. If this has not yet been completed, then United Petfood (UK) Ltd is to provide to NRW a date in which this will be completed.	31/10/2026
IR3A(1)	**CAR_NRW0053216.A2** United Petfood (UK) Ltd is to continue to progress with the upgrade of the Effluent Treatment Plant (ETP). While these works are being undertaken, the operator must implement and maintain appropriate management systems, controls, and procedures to ensure that all discharges via emission point S1 comply with the permitted Emission Limit Values (ELVs).	16/04/2027
IR3E	**CAR_NRW0053216.A3** United Petfood (UK) Ltd must review all internal and external analytical methods currently being used for permit compliance monitoring and confirm whether these align with the standards specified within the environmental permit. Where alternative methods are being used (both internally and externally), United Petfood (UK) Ltd should retain evidence demonstrating their suitability and equivalence to the permit-specified standards and submit this to NRW for review and approval.	11/12/2026
	CAR_NRW0053216.A4 United Petfood (UK) Ltd is to complete the Operator Monitoring Assessment (OMA) self-assessment tool by the specified deadline. Once completed, this is to be submitted to NRW to inform part of the upcoming OMA Audit.	31/03/2027

Compliance Criteria	Action needed	Complete by
IR4B	**CAR_NRW0053216.A5** United Petfood (UK) Ltd must revise its procedures and ensure that reporting is undertaken in accordance with permit condition 4.2.3b (already completed). Please be advised that failure to comply with this requirement in the future is likely to result in enforcement action being taken.	Already completed
IR4C	**CAR_NRW0053216.A6** United Petfood (UK) Ltd is to ensure that they notify NRW in the first instance of becoming aware of a permit breach.	Already completed

Action 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 prosecutions 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 inaccuracies that have been identified within the Quarterly Monitoring Reporting which were submitted by United Petfood UK Ltd (the Operator) between the calendar years 2024 to 2025.

Scope

The following documents have been assessed as part of this Compliance Assessment Report (CAR):

- Regulation 61 Information: External lab certificates from DECUS detailing exceedances of permitted levels, submitted by United Petfood (UK) Ltd on the 8th of May 2026:
  - *Cert 7293 United Pet Foods*
  - *Cert 7342 United Pet Foods*
  - *Cert 7365 United Pet Foods*

  - *Cert. 7446 United Pet Foods*
  - *Cert. 7480 United Pet Foods*
  - *Cert. 7530 United Pet Foods*
  - *Cert. 7579 United Pet Foods*
  - *Cert. 7770 United Pet Foods*
  - *Cert. 7789 United Pet Foods*
  - *Cert. 7823 United Pet Foods*
  - *Cert. 7850 United Pet Foods*
  - *Cert. 8020 United Pet Foods*
  - *Cert. 9034 United Pet Foods*
  - *Cert. 9623 United Pet Foods*
  - *Cert. 9744 United Pet Foods*
  - *Cert. 10004 United Pet Foods*
  - *Cert. 10205 United Pet Foods*
  - *Cert. 10275 United Pet Foods*
- United Petfood (UK) Ltd Quarterly Submissions:
  - *UPF Reporting CB3091HY Q1 01.01.24 to 30.03.24*
  - *UPF Reporting CB3091HY Q2 01.04.24 to 30.06.24*
  - *UPF Reporting CB3091HY Q3 01.07.24 to 30.09.24*
  - *UPF Reporting CB3091HY Q4 01.10.24 to 31.12.24*
  - *UPF Reporting CB3091HY Q1 01.01.25 to 30.03.25*
  - *UPF Reporting CB3091HY Q2 01.04.25 to 30.06.25*

Compliance Assessment

Reporting Inaccuracies

On the 17th of April 2026, Natural Resources Wales (NRW) issued United Petfood (UK) Ltd with an Environmental Permitting (England and Wales) Regulations 2016 Regulation 61(1) Notice. This Notice required United Petfood (UK) Ltd to submit all available external laboratory analysis certificates including their in-house data spreadsheet to cover the 1st of January 2024 to 1st of July 2025 period. NRW was already in possession of external laboratory analysis certificates covering the 1st of July 2025 to 31st of December 2025 following a request for information relating to requirements specified by Improvement Condition (IC) 4.

The basis for NRW issuing the Regulation 61(1) Notice was following the identification of two permitted Emission Limit Values exceedances in Quarter 4 2025 (see CAR_NRW0050854), where United Petfood (UK) Ltd failed to accurately report monitoring data to NRW in accordance with their EPR Permit. United Petfood (UK) Ltd met the deadline of this Regulation 61(1) Notice on the 8th of May 2026 via a series of email submissions containing the aforementioned laboratory certificates.

NRW has now reviewed these submissions, and have formulated observations which form the basis of this CAR form.

From the Regulation 61(1) Submissions, NRW has noted that there were thirty five instances where United Petfood (UK) Ltd exceeded the permitted Emission Limit Values (ELVs) that are specified within *Schedule 3(b): Table S3.2* of the EPR Permit. These exceedances included the following parameters:

- Total Suspended Solids (TSS)
- Biological Oxygen Demand (BOD)
- Chemical Oxygen Demand (COD)
- pH
- Total Phosphorus
- Total Nitrogen

Please note that whilst thirty five instances of permit non-compliance have been identified, NRW considers it possible that additional breaches may have occurred but remain unidentified. This is because, until Quarter 3 2025, United Petfood (UK) Ltd monitored only for Orthophosphate and Nitrate, rather than Total Phosphorus/Total Nitrogen. As Orthophosphate and Nitrate represent only components of these aforementioned parameters, the monitoring undertaken prior to monitoring improvements was not sufficient at the time to identify all exceedances of the permit limits. Additionally, it has been noted that stability time deviation codes were applied to forty five weekly samples. This has the potential to have masked further permit breaches, particularly in relation to TSS and BOD, where exceedances may not have been accurately identified due to the validity of the analytical results being compromised.

Deficiencies regarding monitoring and sample stability has not been compliance assessed at this time, and instead will form part of the Operator Monitoring Assessment (OMA) which is proposed to be undertaken in due course.

United Petfood (UK) Ltd failed to accurately report, thirty three of these confirmed permitted ELV non-compliances within the listed Quarterly Submissions, which has been acknowledged by United Petfood (UK) Ltd within the Regulation 61(1) Submission. To date, United Petfood (UK) Ltd has not provided an explanation as to why these mandatory legal obligations were not met.

The remaining two exceedances have already been assessed in Quarter 4 2025 (see CAR_NRW0050854), and were attributed by United Petfood (UK) Ltd to a transcription error by compliance personnel. However, given the number of instances and magnitude of some of the newly identified discrepancies, NRW questions the validity of this explanation for these cases.

Compliance

Permit condition 4.2.3b below specifies:

'Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by Natural Resources Wales, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

(b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4 ; and'

Schedule 4(b): Table S4.4 is extracted below:

Table S4.4 Reporting forms

Media/parameter	Reporting format	Date of form
Air	Form air 1 or other form as agreed in writing by Natural Resources Wales	04/12/23
Water and Land	Form water 1 or other form as agreed in writing by Natural Resources Wales	04/12/23
Water usage	Form water usage 1 or other form as agreed in writing by Natural Resources Wales	04/12/23
Energy usage	Form energy 1 or other form as agreed in writing by Natural Resources Wales	04/12/23
Other performance indicators	Form performance 1 or other form as agreed in writing by Natural Resources Wales	04/03/21

Note 1 within *Water1 / 04/12/23* stipulates the following:

[1] 'The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values.'

Consequently, in light of the above, the failure to accurately report the maximum recorded concentration within the Quarterly Monitoring Returns constitutes a breach of permit condition 4.2.3b. Given the number of occurrences, the magnitude of certain exceedances, and the potential implications for permit compliance, regulatory oversight and environmental protection, NRW considers it appropriate to assign a C2 non-compliance score under Compliance Criterion IR4B – Reporting.

In accordance with NRW's compliance classification guidance, and consistent with the approach adopted in CAR reference NRW0050854, a C2 non-compliance score will be applied for each reporting period in which permit exceedances were not accurately reported. This equates to a total of six C2 non-compliance scores being recorded against this compliance criterion.

Action:
United Petfood (UK) Ltd must revise its procedures and ensure that reporting is undertaken in accordance with permit condition 4.2.3b (already completed). Please be advised that failure to comply with this requirement in the future is likely to result in enforcement action being taken.

Please be advised that not only is a failure to comply with a permit condition an offence under Regulation 38(2), but further offences may also arise under Regulation 38(4)(b) and/or Regulation 38(4)(c), for which enforcement action may have been justifiable. However, in recognition of the progress made by United Petfood (UK) Ltd towards achieving compliance, NRW will not be pursuing enforcement action in relation to these additional offences at this time. Please note that NRW reserves the right to reconsider this approach should any new information come to light.

Permit Breaches – Emissions to Water & Monitoring

As outlined above, there were thirty five instances of exceedances of the permitted ELVs that are specified within *Schedule 3(b): Table S3.2* of the EPR Permit. These exceedances included the following parameters:

- Total Suspended Solids (TSS)
- Biological Oxygen Demand (BOD)
- Chemical Oxygen Demand (COD)
- pH
- Total Phosphorus
- Total Nitrogen

Permit condition 3.1.2 below stipulates:
'*The limits given in schedule 3 shall not be exceeded.*'

The two exceedances within the Quarter 4 2025 reporting period have previously been scored within CAR_NRW0050854 and as a result these will not be compliance assessed within this CAR form.

With this in mind, across the seven quarterly reporting periods, United Petfood (UK) Ltd has failed to comply with the permitted ELVs for a range of parameters on thirty three separate occasions. These exceedances were not reported to Natural Resources Wales (NRW) as per the Section above.

However, information has come to light which required NRW to conduct a high level review of the analytical methods undertaken by DECUS and compared with the Monitoring Standards specified within *Schedule 3(b): Table S3.2* of the permit, it was noted from this review that the following parameters are not tested in accordance with the prescribed standards illustrated within the permit:

- BOD
- COD
- TSS
- Chloride

Permit condition 3.5.1a 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'

It is noted that tested methods by DECUS appear to be recognised alternative methodologies (as per Monitoring discharges to water: guidance on selecting a monitoring approach - GOV.UK) and importantly that the analysis undertaken is by a UKAS-accredited laboratory.

In light of these monitoring standards discrepancies, NRW will not be allocating non-compliance scores for emissions to water relating to the aforementioned exceedances of BOD, COD and TSS at this time, this is pending further information to be submitted by the Operator as part of the associated IR3E action in this CAR form.

NRW will review the additional information requested by the action and determine whether any further regulatory response is necessary once the monitoring and compliance assessment arrangements have been fully clarified.

A singular C3 non-compliance score has been allocated for the contravention of permit condition 3.1.2 under compliance criterion IR3A(1) – Emissions to Water, relating to the exceedance of the permitted pH limit where the monitoring standards were observed to be comparable.

However, please note that NRW considers that the non-compliances relating to reporting failures remain applicable. At the time of submission, United Petfood (UK) Ltd was aware of both the monitored results and the applicable emission limit values (ELVs), yet the maximum recorded results for the exceeded parameters were not reported within the quarterly returns, as required by permit condition 4.2.3b. NRW has therefore retained the non-compliance scores associated with these reporting failures. This position is based on the failure to report monitoring results in

accordance with the permit requirements and is independent of any subsequent consideration of the validity of the analytical standards themselves.

Please be advised that the scoring may be subject to review, should further information come to light which requires consideration by NRW.

IR3A(1) action:
United Petfood (UK) Ltd is to continue to progress with the upgrade of the Effluent Treatment Plant (ETP). While these works are being undertaken, the operator must implement and maintain appropriate management systems, controls, and procedures to ensure that all discharges via emission point S1 comply with the permitted Emission Limit Values (ELVs).

IR3E action:
United Petfood (UK) Ltd must review all internal and external analytical methods currently being used for permit compliance monitoring and confirm whether these align with the standards specified within the environmental permit. Where alternative methods are being used (both internally and externally), United Petfood (UK) Ltd should retain evidence demonstrating their suitability and equivalence to the permit-specified standards and submit this to NRW for review and approval.

Notifications

Finally, NRW was not notified of any of the thirty three ELV exceedances in which United Petfood (UK) Ltd failed to accurately report.

Permit condition 4.3.1b below stipulates:

'in the event of a breach of any permit condition the operator must immediately—

(i) inform Natural Resources Wales, and
(ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;'

United Petfood (UK) Ltd has failed to comply with the notification requirements specified within its environmental permit. This constitutes a breach of permit condition 4.3.1b. Consistent with the scoring and approach taken in CAR reference NRW0050854, a C2 non-compliance score has been assigned under compliance criterion IR4C – Notifications for each quarter in which a permitted emission limit value (ELV) exceedance occurred. This results in a total of six C2 non-compliance scores being recorded against this compliance criterion.

NRW also considers however that non-compliances relating the failure to notify remain applicable, as United Petfoods (UK) Ltd were aware of the permitted ELVs for exceeded parameters, and yet NRW were not notified in these instances as required by the permit.

Action:
United Petfood (UK) Ltd is to ensure that they notify NRW in the first instance of becoming aware of a permit breach (already completed).

General Management

Permit condition 1.1.1 below stipulates:
'*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;

(b) and using sufficient competent persons and resources.'

The root cause of the reporting inaccuracies, failure to monitor in accordance with the permit and notifications is considered to be indicative of a lack of sufficient training and knowledge surrounding the EPR permit and its obligations. Consequently, in line with NRW's scoring guidelines an additional non-compliance score of C1 has been allocated under Compliance Criterion IR1A – General Management.

Action:
United Petfood (UK) Ltd is to confirm to NRW whether ECL has provided targeted, individual training to the member of personnel primarily responsible for maintaining permit compliance at the Llangadog Site. If this has not yet been completed, then United Petfood (UK) Ltd is to provide to NRW a date in which this will be completed.

Operator Monitoring Assessment (OMA)

To assist NRW in developing a better understanding of the site's monitoring, sampling, analysis and compliance assessment arrangements, an OMA template has been provided to the operator separately to this report to complete. Additionally, guidance has also been provided to assist United Petfood (UK) Ltd with this body of work.

This self-assessment tool is to be completed by United Petfood (UK) Ltd and will help evaluate monitoring management systems, sampling procedures, analytical arrangements, quality assurance processes, data handling and compliance reporting.

The completed assessment should accurately reflect current monitoring arrangements and identify any improvements required to ensure monitoring is undertaken in accordance with permit requirements and recognised monitoring standards.

Action:

United Petfood (UK) Ltd is to complete the Operator Monitoring Assessment (OMA) self-assessment tool by the specified deadline. Once completed, this is to be submitted to NRW to inform part of the upcoming OMA Audit.

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 in the aspects assessed.
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

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.