

Compliance Assessment Report CAR_NRW0048511

Permit being assessed: CG0375101

For: LLYN BRENIG CERRIGYDRUDION CORWEN, held by DWR CYMRU CYFYNGEDIG

At: Llyn Brenig Reservoir, Cerrigydrudion, Cerrigydrudion, Corwen, Conwy, LL21 9TT.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 05/06/2025, between 10:00 and 13:00.

Parts of permit assessed: Whole permit

NRW Lead Officer: Nathan Owen, accompanied by: Gareth Siney.

Report sent to: Fish farm manager , Manager , on 14/10/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-D1 - Water Quality - Information - Records	Action only (X)	
WQ-D1 - Water Quality - Information - Records	C4 No impact	1.1.2
WQ-B3 - Water Quality - Operations - Operating techniques	C4 No impact	2.2.1
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C3 Minor	3.3.2
WQ-D1 - Water Quality - Information - Records	C4 No impact	4.1.2
WQ-D2 - Water Quality - Information - Reporting	C3 Minor	4.2
WQ-B3 - Water Quality - Operations - Operating techniques	C2 Significant	2.1.1 S.1.1
WQ-B3 - Water Quality - Operations - Operating techniques	C3 Minor	2.1.1 S1.1 (d)
WQ-B4 - Water Quality - Operations - Improvement programme	C4 No impact	2.4.1

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-D1	The site is required by permit condition 1.1.3 to have a full and up to date written management system available for inspection. Produce operating documentation specific to operations carried out at Llyn Brenig Fish farm.	31/01/2026
WQ-D1	Site can only operate in compliance with permit condition 1.1.3(b) when suitably qualified persons are on site. site are	Already completed

Criteria	Action needed	Complete by
	to provide certificates for designated suitably qualified persons.	
WQ-B3	The fish farm pens have been moved 150 meters from its permitted point, meaning its Sampling point Outlet 1 has now moved. DCWW to apply for permit variation by 01/08/2026	01/08/2026
WQ-C1	The site is required by permit condition 3.2.2 to store fuel in a secure & safe manner. All fuel and equipment containing fuel must be secured in a bunded area when no in use.	05/09/2025
WQ-D1	Please provide NRW with the past 2 years worth of records covered in this condition.	05/09/2025
WQ-D2	DCWW are required by permit to submit records by the 1st of January every calendar year.	01/01/2026
WQ-B3	DCWW are permitted to only produce up to 50 tonnes of fish in any 12 month period,	28/08/2025
WQ-B3	Permit holder to apply for a permit variation to account for new feed limits of Phosphorus.	01/08/2026
WQ-B4	DCWW are required by permit to carry out improvements specified in table S1.3	28/08/2025

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 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

This CAR form is being re-issued following comments from Dwr Cymru and an internal review of the CAR form in line with NRW policy.

On the 5th of June 2025 NRW officers Nathan Owen and Gareth Siney attended the Fish farm located at Llyn Brenig reservoir CG037510.

The weather on the day was overcast with frequent showers in the catchment. Officers were met by a representative of DCWW who identified himself as one of 2 fish farmers at the facility.

Condition 1.1.3 – Management Plan Documentation

Observation:

The permit holders failed to provide any form of management plan for the site. As stipulated under Condition 1.1.3, permit holders are required to produce relevant documentation upon request by Natural Resources Wales (NRW) inspectors.

Required Action:

The permit holder must produce a site-specific management plan for Llyn Brenig, detailing all permitted activities. This document must be submitted to NRW for review.

Due Date:

31 January 2026

Condition 1.1.2 (C4) – Competence of Personnel**Observation:**

In accordance with Condition 1.1.2, the site must be operated by suitably competent and qualified personnel. During the inspection the permit holders were unable to produce any records demonstrating the competence or qualifications of site personnel.

Required Action:

The permit holder was required to produce and submit competency records for all relevant personnel.

Action:

Action completed – competency records have been provided.

Condition 2.2.1 (C4) – Location of Fish Farm Cages**Observation:**

During the inspection, it was identified that the fish farm cages had been relocated approximately 150 metres from their originally permitted location. This constitutes a deviation from the approved site layout under Condition 2.2.1.

Required Action:

Dŵr Cymru Welsh Water (DCWW) must apply for a permit variation to reflect the updated location of the fish farm cages. The revised permit should ensure that the designated sampling point is situated at the centre of the fish farm, accommodating any future movement within operational boundaries.

Due Date:

01 August 2026

Condition 3.3.2 (C3) – Fuel Oil Storage**Observation:**

During the inspection it was observed that fuel oil was not being stored in accordance with the requirements of Condition 3.3.2. Specifically, the fuel was not stored in appropriately bunded or secure areas, posing a risk of environmental contamination.

Required Action:

Fuel oil must be stored in suitably bunded and secure areas to prevent leaks and ensure compliance with environmental protection standards.

Action completed.

Image 1 – waste drum stored outside of bunded area. Note batteries bottom right.



There were also several power tools such as chainsaws in the tool shed stored near batteries and flammables, these should all be stored in a secure bunded area.



Image 2 – Oils stored in tool shed.

Image 3 – Chainsaws stored outside of bund with oils.



Conditions 4.1.2 (C4) & 4.2 (C3) – Submission of Returns Documentation

Observation:

At the time of inspection no returns documentation was available for review. This constitutes non-compliance with Conditions 4.1.2 and 4.2, which require the timely submission and availability of monitoring data.

Required Action:

The permit holder must provide Natural Resources Wales (NRW) with returns documentation covering the previous two years. Additionally, returns must continue to be submitted annually by 1 January, in accordance with permit requirements.

Due Date:

Ongoing annual submission deadline: 1 January each year

Condition 2.1.1 S1.1 (C2) – Fish Weight Documentation

Observation:

During the inspection the permit holder was unable to produce appropriately managed records documenting the weight of fish produced at the site. As a result, Natural Resources Wales was unable to verify the weight gain of the stock, preventing an accurate assessment of mass and compliance with permit conditions.

Required Action:

The permit holder must improve the record-keeping system and establish a clear methodology for tracking fish weight throughout the production cycle.

Due Date:

31 January 2026

Condition 2.1.1 S1.1(d) (C3) – Phosphorus Content in Feed

Observation:

During the inspection it was identified that the feed being used at the site contains levels of available phosphorus exceeding those permitted under Condition 2.1.1 S1.1(d). This may contribute to elevated nutrient loading in the receiving environment and poses a risk to water quality.

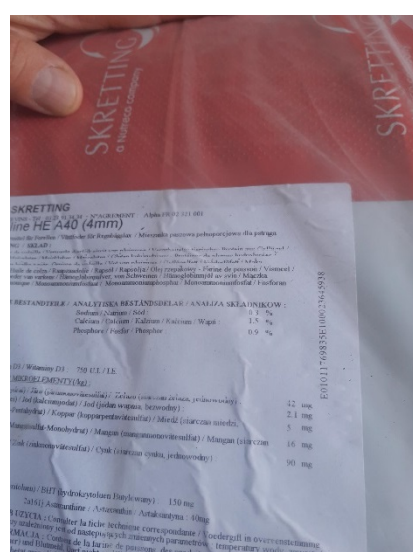
Required Action:

The permit holder must apply for a permit variation to address the use of feed with higher phosphorus content and ensure compliance with environmental limits.

Due Date:

01 August 2026

Image 4 – Feed bag with product details



Biosecurity and Equipment Storage Observations**Observation 1 – Footwear Disinfection Procedure:**

Prior to accessing the farm cages, the fish farmer informed NRW officers of the need to disinfect footwear, which was a positive and proactive measure. However, the disinfection was carried out on the jetty using a pressurised sprayer, resulting in disinfectant residue entering Llyn Brenig. NRW recommends that all sanitation procedures of this nature be conducted on a suitable hard-standing surface where runoff into Llyn Brenig is prevented.

Observation 2 – Storage of Oil-Containing Equipment:

During the visit to the platforms and cages, several pieces of equipment containing oil were observed to be left unsecured on the platforms without any form of bunding. To minimise the risk of environmental contamination, such equipment must be stored securely in appropriately bunded areas when not in use.

Image 5 – jet washes left on platforms.

**Condition 2.4.1 (C4) – Implementation of Improvement Programme****Observation:**

During the inspection the permit holder was unable to provide evidence that any actions outlined in the approved improvement programme had been implemented. This represents non-compliance with Condition 2.4.1, which requires demonstrable progress against agreed improvement measures.

Required Action:

The permit holder must provide documented evidence confirming that the actions specified in the improvement programme have been carried out.

Due Date:

31 January 2026

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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 to 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 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

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend non-compliance for up to six months to allow time for remedial action to be taken. These will be re-instated if the action is not completed.

Full list of water quality action criteria (used in section 1 and 2):**WQ A: Management**

- WQ-A1 General management

WQ B: Operations

- WQ-B1 Permitted activities
- WQ-B2 The site
- WQ-B3 Operating techniques
- WQ-B4 Improvement programme
- WQ-B5 Pre-operational conditions

WQ C: Emissions and monitoring

- WQ-C1 Emissions to water
- WQ-C2 Emissions to land
- WQ-C3 Emissions of substances not controlled by emission limits
- WQ-C4 Installation of monitoring boreholes

WQ D: Information

- WQ-D1 Records
- WQ-D2 Reporting
- WQ-D3 Notifications

Enforcement response

Any permit condition non-compliance 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 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at 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.