

## Compliance Assessment Report CAR\_NRW0049812

**Permit being assessed:** S/01/95520/LG  
For: Upper Blackhill, held by B & M James  
At: Dolfor, Newtown, Powys, , SY16 4AB.

**Type of assessment carried out:** Site Inspection, Reason: Routine.  
On 13/10/2025, between 13:30 and 14:45.  
Parts of permit assessed: All conditions

**NRW Lead Officer:** Shaun Rees.

**Report sent to:** B.M & M.A. James, Operators, on 30/10/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-A1 - Water Quality - Management - General management	C3 Minor	1.1.2
WQ-B1 - Water Quality - Operations - Permitted activities	Assessed (A)	
WQ-B2 - Water Quality - Operations - The site	Assessed (A)	
WQ-B3 - Water Quality - Operations - Operating techniques	Assessed (A)	
WQ-C3 - Water Quality - Emissions and monitoring - Emissions of substances not controlled by emission limits	Assessed (A)	
WQ-D1 - Water Quality - Information - Records	C3 Minor	4.1.2

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

### 2. What action is required?

Criteria	Action needed	Complete by
WQ-A1	Produce a written Environmental Management System	21/11/2025
WQ-D1	Produce a Written Environmental Management System	21/11/2025

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.

**At this time, we do not intend to take any further action.**

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

## 4. Details of our assessment

Natural Resources Wales Officer Shaun Rees met with Mr Powel James and Prosser James to carry out an inspection in regards to the sites EPR sheep dip permit on the 13 October 2025 at 13:30.

On arrival I met with Mr Powel James at the location of the sheep dipping bath, the operation was explained to me in detail and how the operation is set up.

The sealed dipping bath is located within a steel framed building, and when required, it is set up to include splash gates and a long drain pen.

The area is concreted including the long drain pen and excess dip drains back to the dipping bath.

The drain pen is managed by the release of the first half of the sheep, when the pen is full resulting in them sheep receiving a 10 minute drain time.

When the first half of the dipped sheep are then released from the drain pen, there are let into a nearby field, with no access to a watercourse, and contains a mains water tank.

No dipped sheep have access to any watercourses for over 2 weeks, as all watercourses on the farm are doubled fenced.

Spill kit available in nearby workshop and clean water available at dipping bath location.

Sheep dip concentrate is kept within the farm chemical store, but is generally bought when required.

We then left the dipping bath location and headed to the disposal area, no issues seen at the disposal area, good coverage of vegetation and no sign of watercourses, slight incline within the area, but not of concern.

Mr Prosser Powell then arrived on site and we discussed the records kept.

Mr Powell was only able to provide me some details of the latest disposal and no Written Environmental Management system provided.

*Non-Compliances (recorded in summary) Actions to be addressed –*

### 1.1.2 General Management

As part of the permit conditions, you are required to have a written environmental management system and during the inspection no written Environmental Management System was provided and limited details of disposal was recorded.

Please produce a Written Environmental Management system and provide a copy to NRW by the 21 November 2025

[Natural Resources Wales / Develop an Environmental Management System for a permit to discharge used sheep dip to land](#)

#### **4.1.2 Records**

As part of the permit conditions, you are required to have a written environmental management system and during the inspection no written Environmental Management System was provided and limited details of disposal was recorded.

Please produce a Written Environmental Management system and provide a copy to NRW by the 21 November 2025

Thankyou again for your time during the inspection.

**In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order 2012.**

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](mailto: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](mailto: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.