

Compliance Assessment Report CAR_NRW0050249

Permit being assessed: LB3790HA.

For: Anaerobic Digester, **held by:** Glanmiheli Farm Ltd

At: Glanmiheli Farm, Kerry, Newtown, Powys, SY16 4LN.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 22/12/2025.

Parts of permit assessed: Emission to Air, Records, Reporting.

NRW Lead Officer: Malcolm Dines.

Report sent to: Lloyd Powell, Technically Competent Manager, on 06/01/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W3E - Waste - Emissions and monitoring - Monitoring	C3 Minor	3.5.1
W4A - Waste - Information - Records	Assessed (A)	
W4A - Waste - Information - Records	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
1	4

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
W3E	Provide a date for when your gas engine will be re-tested. The testing must be done at the earliest opportunity.	20/01/2026
W4A	Provide an explanation for: 1) Fluctuations in levels of VOAs and the Alkalinity to VOA Ratio resulting in levels outside expected parameters for a	20/01/2026

Criteria	Action needed	Complete by
	farm-fed AD site on 2 June 2025, 4 August 2025 and 11 August 2025 2) Levels of alkalinity that exceeded the typically expected parameters of a farm-fed AD site on 6 May 2025 and 23 June 2025. 3) Provide your current Hydraulic Retention Time	
W1A	Submit all sections of your Management System that are relevant to the monitoring of stack emissions.	20/01/2026

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

This review of data was carried out by Malcolm Dines (Waste Regulation Office) following the submission of the reports required by Compliance Report (ref: CAR_NRW000136) sent to you by email on 11 December 2025.

Permit Breaches

W3E - Monitoring - Cat 3; Permit Condition 3.5.1

You have been given this category 3 breach under the above permit condition because you failed to carry out stack emission monitoring in 2025 as required by Table 3.1 of your permit. Because you failed to undertake this monitoring, you must receive a compliance score of at least "3", but, as the monitoring results reported in your stack emission monitoring for 2024 did not identify any breaches of emission limit values, or any results that were Approach To Limit, it is reasonably foreseeable that any emissions are going to have no more than a minor environmental impact.

Action: You must get your engine tested at the earliest opportunity. Provide a date for when the engine will be tested **by 20 January 2026.**

Other Matters

Management System

On compliance report NRW_CAR0050136 you were required to submit a copy of your Management System in use on that date. You submitted a link to the management system

that I was unable to use. Rather than try again, please will you submit the sections of the Management System that was in use on 11 December 2025 and that are relevant to undertaking and reporting stack emission monitoring **by 20 January 2026**

Process System Records and Maintenance

I have reviewed the process data you have supplied against industry standards for expected levels within farm-fed digesters.

Action: please can you answer the following queries **by 20 January 2026:**

1) Records show that on 2 June 2025, 4 August 2025 and 11 August 2025, the VOA levels were 7,900 mg/l; 8,800 mg/l and 8,700 mg/l; and Alkalinity-to-VOA Ratios of 2.9:1; 2.6:1 and 2.6:1 respectively. For a farm-fed digester, the usual range for VOA's is 3,000 to 8,000 mg/l with an Alkalinity to VOA Ratio of greater than 3:1. For the rest of the period the records cover show both these parameters to be relatively stable, please can you provide an explanation of what changed in the process around those dates that could have caused the significant variation in these parameters.

2) Records show that on 6 May 2025 the alkalinity in the digester was 27,068 mg/l and on 23 June 2025 it was 26,131 mg/l. These are higher than the maximum of 25,000 mg/l typically expected in a farm-fed digester. Please can you provide insight into why this may have occurred.

3) Provide your current Hydraulic Retention Time

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 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 only relating to the activity assessment
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 Waste compliance criteria (used in section 1 and 2):

1. Management

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A – Emissions to water, air or land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – 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.

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 to 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.