

Compliance Assessment Report CAR_NRW0050264

Permit being assessed: AB3393FL.

For: Lower Park Farm Co-operative AD Plant, **held by:** Mr Richard Tomlinson, Mrs Sadie Tomlinson, Mr George Tomlinson and Mr William Tomlinson

At: Lower Park farm, Parkside, Rossett, Wrexham, LL12 0BN.

Type of assessment: Site Inspection,

Reason: Routine.

On: 17/12/2025 between 10:00 and 10:45.

Parts of permit assessed: 1.1.1.

NRW Lead Officer: Ian Thomas2.

Report sent to: richard tomlinson, owner, 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
W2E - Waste - Operations - Waste acceptance	Action only (X)	
W4B - Waste - Information - Reporting	C4 No impact	Section 4.2.2 of the site permit states that "Within one month of the end of each quarter, the operator shall submit to NRW using the form made available for the purpose, the information specified in the form relating to the site and the waste accepted and removed from it during the previous quarter.
W2E - Waste - Operations - Waste acceptance	C3 Minor	2.3 Waste acceptance

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

Total non-compliances recorded	Total non-compliance score
2	4.1

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
W2E	supply waste transfer relating to waste paper acceptance	30/01/2026
W4B	submit all waste returns up to date.	30/01/2026
W2E	No further acceptance of unauthorised waste.	05/01/2026

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.

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

On Friday the 17th of December 2025 Ian Thomas, waste regulation officer carried out a routine, unannounced inspection. The weather was cold and wintry conditions. The officer was met by Mr Richard Tomlinson, site owner. Mr Richard Tomlinson showed the officer around.

The AD plant is using waste produced from the farm and has started accepting waste from a paper process, this is being added to the slurry and waste to add carbon to the digester.



Waste paper materials.

Checks on waste acceptance within permit AB3393FL shows that according to Section 2.3, there is no capacity to accept waste materials of this type. There were no waste transfer notes available at the time of the visit, Richard explained that William was looking after this paperwork.

Only the following waste types shall be accepted

2.3 Waste acceptance

2.3.1 Waste shall only be accepted if:

- (a) it is of a type and quantity listed in tables 2.1 and 2.3 of these rules;**
- (b) it conforms to the description in the documentation supplied by the producer and holder;**
- (c) the waste is biodegradable;**
- (d) wastes that are animal by-products or contain animal by-products must be handled and processed in accordance with any requirements and restrictions imposed by the animal by[1]products legislation; and**
- (e) it is not hazardous waste.**

2.3.2 Records demonstrating compliance with rule 2.3.1 shall be maintained.

Table 2.3 Waste Types

Description

02 WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, AND**HUNTING, FISHING, FOOD PREPARATION AND PROCESSING**

02 01 wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing

02 01 01 sludge from washing and cleaning – vegetables, fruit and other crops**02 01 03** plant tissue waste - husks, cereal dust, waste animal feeds, off-cuts from vegetable and fruit and

other vegetation waste

02 01 06 animal faeces, urine, manure including spoiled straw**02 05 Wastes from the dairy products industry****02 05 01** biodegradable materials unsuitable for consumption or processing (other than those containing

hazardous substances) – solid and liquid dairy products, milk, food processing wastes, yoghurt,

whey from dairies

02 05 02 sludge from dairies effluent treatmentThis non compliance with the acceptance of materials not stated under section 2.3 has been **Scored C3**.**Action** - Please provide waste transfer notes for materials received showing all relevant information required, e.g – European waste code, quantities. Please supply this paperwork to NRW officers by 30th January 2026.

The AD plant tanks and feedstock were checked and found to be in good working order with no signs of any issues – cracks or structural damage. The bunded area around the digester was clear and tidy. The mixing facility also appeared to be in good order. Good records were also kept of the waste input in the AD diary. Overall site was in excellent condition.

The gas plant was checked and was in good working order, constantly producing power which is added to the grid. Richard explained that maintenance checks are carried out under contract on a weekly basis.

Following the last site inspection carried out on 17th May 2024, it was recorded as an

action that waste returns had not been submitted as required by the permit conditions. Checks carried out prior to the inspection showed that waste returns have still not been submitted since 2022.

Further to this, on 19th August 2022, checks were carried out on waste returns for the permit. Ref – NRW0040285. This was sent with a request to submit waste returns up to date.

The failure to submit waste returns could further impact the ability to ensure the maximum 31,000 tonnes processed per annum.

1.5.4 The AD process is fuelled by up to 31,000 tonnes/annum of farm waste and manure consisting of the following feedstocks:

- 2,000 tonnes of poultry manure;
- 2,000 tonnes of grass silage;
- 2,000 tonnes of farmyard manure; and,
- 25,000 tonnes of cow slurry

Waste returns: Section 4.2.2 of the site permit states that "Within one month of the end of each quarter, the operator shall submit to NRW using the form made available for the purpose, the information specified in the form relating to the site and the waste accepted and removed from it during the previous quarter.

Scored C4 – Waste returns have not been submitted after multiple requests. Ensure all waste returns are submitted up to and including the current quarter by **30th January 2026**.

Please make available evidence that the above quantities relating to section 1.5.4 are adhered to. This can be in writing or via email.

Thank you for assisting with the inspection.

Kind regards,

Ian Thomas, Waste regulation Officer

Please find your regulating officer's contact details below.

Email: ian.thomas2@cyfoethnaturiolcymru.gov.uk

Post: Natural Resources Wales, Chester Road, Buckley, Flintshire, CH7 3AJ

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.