

Compliance Assessment Report CAR_NRW0050579

Permit being assessed: MB3190HG.

For: A D Plant, **held by:** Edith Patricia Parry Ltd

At: Warren, Rhos-Y-Meirch, Knighton, Knighton, Powys, LD7 1PE.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 04/02/2026.

Parts of permit assessed: Submission of records and reporting.

NRW Lead Officer: Malcolm Dines.

Report sent to: Lucy Owen, Technically Competent Manager, on 04/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	C3 Minor	1.1.1 & 1.1.2
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W2C - Waste - Operations - Operating techniques	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
W1A	Submit a copy of the report for Emissions Monitoring carried out in 2025, or provide confirmation and evidence that emissions monitoring has been booked for the earliest	08/03/2026

Criteria	Action needed	Complete by
	possible date.	
W1A	Submit your process records for the period 1 January 2025 to 31 December 2025 (inclusive), for the following: <ol style="list-style-type: none"> 1. Amount of Methane in the Biogas 2. Level of Digestate Ammonia 3. Alkalinity 4. Amount of Volatile Fatty Acids (VFA) 5. Alkalinity:VFA ratio 6. pH 7. Records of Daily/Weekly/Monthly routine checks and maintenance 8. Records of Pressure Relief Valve checks and actuations 9. Records of Auxiliary Flare operating hours If you do not have some or all of these records, you must provide a detailed explanation of why you do not have these records and how you ensure process stability.	08/03/2026
W1A	Submit a copy of your Environment Management System	08/03/2026
W2C	Submit your inspection, maintenance and repair records of the facility's critical infrastructure, including the impermeable surfacing and drainage system for 1 January 2025 to 31 December 2025 inclusive.	08/03/2026

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 Officer) following a review of outstanding compliance actions from Compliance Report (CAR_NRW0050251) dated 22 December 2025.

Permit Breaches

W1A - General Management - Environmental Management System and Records
 Demonstrating Compliance with Permit Condition 1.1.1 - Cat 3: Permit Condition 1.1.1 & 1.1.2

You have been given this Category 3 breach of permit conditions 1.1.1 and 1.1.2 as you

have failed to submit a copy of your Stack Emission Monitoring for 2025, your process monitoring records and a copy of your Environment Management System, by 28 January 2026, as required by Compliance Report CAR_NRW0050251 dated 22 December 2025.

Compliance actions are not optional, permit conditions are written to be environmentally protective and therefore it is reasonably foreseeable that the failure to comply with a permit condition will result in environmental harm.

Action: Submit a copy of the report for Emissions Monitoring carried out in 2025, or provide confirmation and evidence that emissions monitoring has been booked for the earliest possible date **by 8 March 2026**

Action: Submit your process records for the period 1 January 2025 to 31 December 2025 (inclusive), for the following **by 8 March 2026**:

- Amount of Methane in the Biogas
- Level of Digestate Ammonia
- Alkalinity
- Amount of Volatile Fatty Acids (VFA)
- Alkalinity:VFA ratio
- pH
- Records of Daily/Weekly/Monthly routine checks and maintenance
- Records of Pressure Relief Valve checks and actuations
- Records of Auxiliary Flare operating hours

If you do not have some or all of these records, you must provide a detailed explanation of why you do not have these records and how you ensure process stability.

Action: Submit a copy of your Environment Management System **by 8 March 2026**

Other Matters

W2C - Operating Techniques: Permit Condition 3.5.1

Please submit your inspection, maintenance and repair records, for 1 January 2025 to 31 December 2025 (inclusive), of the facility's critical infrastructure, including the impermeable surfacing and drainage system.

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- W3A(2) – Emissions to air
- W3A(3) – Emissions to 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.

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.