

## Compliance Assessment Report CAR\_NRW0050655

**Permit being assessed:** XP3830UR.

**For:** Haverfordwest Creamery, **held by:** The First Milk Cheese Company Ltd

**At:** Haverfordwest Creamery Pembroke Road , Merlins Bridge, HAVERFORDWEST, Dyfed, SA61 1JN.

**Type of assessment:** Report/Data Review,

**Reason:** Routine.

**On:** 31/12/2025.

**Parts of permit assessed:** Emissions & Monitoring, Reporting.

**NRW Lead Officer:** Rhydian Cox.

**Report sent to:** SHE Manager, The First Milk Cheese Company Ltd, on 12/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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?

No action required.

### 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

#### Annual Monitoring Returns 2025

This Compliance Assessment Report (CAR) has been issued in response to the submission of the 2025 Annual Monitoring Returns by **The First Milk Cheese Company Ltd (First Milk)** for activities carried out at **Haverfordwest Creamery, Pembroke Road, Merlins Bridge, Haverfordwest, SA61 1JN** under permit **EPR/XP3830U**.

Monitoring returns and reports for the following periods have been assessed in this CAR:

- *Reporting of emissions to air for the period from 01/01/2025 to 31/12/2025*
- *Reporting of emissions to water (other than sewer) and land for the period from 01/07/2025 to 31/12/2025*
- *Reporting of other performance indicators for the period 01/01/2025 to 31/12/2025*
- *Reporting of Energy Usage for the year 01/01/2025 to 31/12/2025*
- *Reporting of Water Usage for the year 01/01/2025 to 31/12/2025*
- *Mercury and Cadmium annual limits - for the period from 01/01/2025 to 31/12/2025*

This CAR was undertaken on **12 February 2026**. However, for the purpose of ensuring that Compliance Classification Scheme (CCS) scoring is attributed to the correct financial year for billing, the CAR date has been amended to **31 December 2026**.

to ensure that the CCS scoring is attributed to the correct financial year (for billing) the date on the CARs has been altered to 31 December 2025.

#### Compliance Assessment

Table S4.1 (Schedule 4(b)) of the permit states that the 12-month reporting period for emissions to air begins on **1 January**, and the 6-month reporting period for emissions to water begin on the **1 January** and **1 July** respectively. Schedule 3(b) emissions and monitoring became effective from **4 December 2023**.

First Milk submitted the 2025 Monitoring Returns to NRW on **27 January 2026**, in compliance with permit condition 4.2.2.

#### Emissions to Air

The operator submitted the *Reporting of Emissions to Air for the period from 01/01/2025 to 31/12/2025* in the approved reporting format (**Form Air 1 / 21/07/2020**).

- All required parameters were reported in accordance with the Emission Limit Values specified in the permit

- No exceedances were recorded.

### **Emissions to Water**

The operator submitted the *Reporting of Emissions to Water (other than sewer) and land for the period from 01/07/2025 to 31/12/2025* in the approved reporting format (**Form Water 1 / 04/12/2023**).

- All required parameters were reported in accordance with the Emission Limit Values specified in the permit
- No exceedances were recorded.

### **Performance Reports**

Condition 4.2.3 of the permit requires First Milk to submit annual performance reports by **31 January**. The operator submitted the 2025 annual performance reports on **27 January 2026** in the required reporting forms, in compliance with condition 4.2.3(c).

### **Water Usage**

Annual reporting of potable and non-potable water usage was submitted in line with Table S4.3, using the required form (**WaterUsage1**).

- No issues noted.

### **Energy Usage**

Annual reporting of energy usage was submitted in accordance with Table S4.3, using the required form (**Engergy1**).

- No issues noted.

Output from the natural gas-fired CHP plant was reported in **Performance1** as required.

### **Performance Indicators**

Other performance indicators for the 2025 reporting year were submitted using the required form (**Performance1**). Reported parameters included: Total raw material used, Natural gas fired CHP output (electricity), Waste disposal and/or recovery, Mass of ammonia released to water, Mass of refrigerants released. These were all submitted in accordance with Table S4.3.

- No issues noted, although the operator included an additional note regarding increased waste disposal.

The operator had indicated that the annual report detailing nitrates, suspended solids, and phosphates reductions under the Nutrient Efficiency (Offset) Scheme will be submitted separately. This will be reviewed upon receipt.

Annual production of dairy products, as required by table S4.2, has also been reported with no issues noted.

**END**

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 Industry compliance criteria (used in section 1 and 2):****1. Management**

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

**2. Operations**

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

**3. Emission and Monitoring**

- IR3A(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

**4. Information**

- IR4A – Records
- IR4B – Reporting
- IR4C – 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](mailto: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](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.