

## Compliance Assessment Report CAR\_NRW0050424

**Permit being assessed:** WP3231NB.

**For:** The Creamery , **held by:** Dairy Partners (Cymru Wales) Limited

**At:** Aberarad, Newcastle Emlyn, Carmarthenshire, SA38 9DQ.

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

**Reason:** Routine.

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

**Parts of permit assessed:** Emissions and monitoring, Information.

**NRW Lead Officer:** Alex Bowder.

**Report sent to:** Dairy Partners (Cymru Wales) Limited, EH&S Manager, on 13/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Installations - Information - Reporting	C4 No impact	4.2.2 (a)

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

Total non-compliances recorded	Total non-compliance score
1	0.1

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
IR4B	The operator must ensure that an interpretive review of its performance activities is included in all future annual monitoring returns.	13/03/2026

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.

#### **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

This Compliance Assessment Report (CAR) has been issued in response to the submission of the Q4 2025 (October - December) and Annual Monitoring Returns 2025 (1 January - 31 December) by Dairy Partners (Cymru Wales) Ltd (the operator) for activities at The Creamery, Aberarad, Newcastle Emlyn SA38 9DQ under Permit EPR-WP3231NB.

This compliance assessment was undertaken by NRW Officers on 11 February 2026. However, to ensure that the CCS score is attributed to the correct financial year for billing purposes, the date on the CAR has been altered to 31 December 2025.

#### **Q4 Monitoring Returns 2025**

The sampling and analysis results of emissions for the specified parameters and emission points (W1, W2, and W3) for Q4 2025 were submitted by the operator to NRW on 19 January 2026.

The following documents were submitted for the Q4 2025 monitoring returns:

- Water1 / 16/05/2023 - forms covering the reporting periods from:
  1. 01/10/2025 to 31/10/2025
  2. 01/11/2025 to 30/11/2025
  3. 01/12/2025 to 31/12/2025

#### **Reporting of emissions to water (other than to sewer) and land**

##### Water1 / 01/10/2025 to 31/10/2025

For the period 1 to 31 October 2025, the submission for emissions to water (**W1**) provided data for the Maximum daily discharge volume, Biological Oxygen Demand (BOD), Chemical Oxygen Demand (COD), Total Suspended Solids (TSS), Ammoniacal Nitrogen, Nitrite, Total Nitrogen, Total Phosphorus, Total Aluminium, Temperature, pH, and Chloride.

All parameters were within the permitted emission limits.

Emissions out of **W2** for visible oil and grease has been declared as clear. **W3** is blocked up and should not present any discharge risk.

##### Water1 / 01/11/2025 to 30/11/2025

For the period 1 to 30 November 2025, the submission for emissions to water (**W1**) provided

data for the Maximum daily discharge volume, Biological Oxygen Demand (BOD), Chemical Oxygen Demand (COD), Total Suspended Solids (TSS), Ammoniacal Nitrogen, Nitrite, Total Nitrogen, Total Phosphorus, Total Aluminium, Temperature, pH, and Chloride.

All parameters were within the permitted emission limits.

Emissions out of **W2** for visible oil and grease has been declared as clear. **W3** is blocked up and should not present any discharge risk.

#### Water1 / 01/12/2025 to 31/12/2025

For the period 1 to 31 December 2025, the submission for emissions to water (W1) provided data for the Maximum daily discharge volume, Biological Oxygen Demand (BOD), Chemical Oxygen Demand (COD), Total Suspended Solids (TSS), Ammoniacal Nitrogen, Nitrite, Total Nitrogen, Total Phosphorus, Total Aluminium, Temperature, pH, Chloride, Mercury, and Cadmium.

All parameters were within the permitted emission limits.

Emissions out of **W2** for visible oil and grease has been declared as clear. **W3** is blocked up and should not present any discharge risk.

### **Q4 Compliance Summary**

- The monitoring data was sent within the **Q4** 2025 reporting period, which is compliant with permit condition **4.2.3**.
- The monitoring was conducted inside the **Q4** 2025 monitoring period, which is compliant with permit condition **3.5.1**.
- The monitoring returns submitted includes reporting of monitoring carried out for the parameters and emission points specified in table **S4.1** of schedule 4, which is compliant with the permit.
- Based on the reports submitted by the operator, all other emissions at the monitoring points appear compliant with the specified limits over the **Q4** 2025 reporting period.

### **Annual Monitoring Returns 2025**

The following documents were submitted by the operator to NRW on 23 January 2026 as part of the annual monitoring returns 2025:

- Air1 / 09/03/2023
- Water1 / 09/03/2023
- WaterUsage1 / 09/03/2023
- Energy1 / 09/03/2023
- Performance1 / 09/03/2023

**Air1 / 09/03/2023**

The operator has sampled its emissions to air for Boiler 1 and 2 on 15 December 2025.

**Water1 09/03/2023**

For the period 1 January - 31 December 2025, the submission for emissions to water (**W1**) provided data for the Maximum daily discharge volume, Biological Oxygen Demand (BOD), Chemical Oxygen Demand (COD), Total Suspended Solids (TSS), Ammoniacal Nitrogen, Nitrite, Total Nitrogen, Total Phosphorus, Total Aluminium, Temperature, pH, and Chloride.

The operator has also submitted monitoring data for **mercury** and **cadmium** emissions to W1, as required annually by Table S3.3.

Based on the data submitted by the operator, all other emissions at the monitoring points appear compliant with the specified limits over the 2025 reporting period.

**WaterUseage1 / 09/03/2023**

The operator has declared the water used for 2024 to be 251,457 m<sup>3</sup>.

**Energy1 / 09/03/2023**

The operator has submitted its energy usage data for:

- electricity
- liquid natural gas
- light fuel oil / gas oil

The data submitted represents compliance with the permit.

**Performance1 / 09/03/2023**

The operator has submitted its performance data for:

- total milk used
- total cheese produced
- total waste sent for recovery
- total waste sent for disposal

Based on the data submitted by the operator, all other emissions at the monitoring points appear compliant with the specified limits over the 2025 reporting period.

**Compliance Breach**

Permit condition 4.2.2 requires a review of the results of the monitoring and assessment carried out in accordance with the permit, including an **interpretive review** of that data. **This has not been completed.** The operator must provide an interpretive review of its performance data for the activities undertaken over the previous year. This was also not submitted as part of the 2024 annual returns.

In accordance with NRW's compliance scoring guidance, a non-compliance score of **C4** has been recorded against sub-criteria IR4B.

**Action**

**The operator must ensure that an interpretive review of its performance activities is included in all future annual monitoring returns.**

**Compliance summary**

1. The operator has submitted its annual monitoring returns to NRW within the 2025 reporting period specified in condition **4.2.2** of the permit.
2. The monitoring was conducted inside the 2025 monitoring period, which is compliant with permit condition **3.5.1**.
3. The monitoring returns submitted include reporting of the monitoring carried out for the parameters and emission points specified in **Table S4.1, S4.2, and S4.3** of Schedule 4, which is compliant with the requirements of the permit.
4. Based on the reports submitted by the operator, the monitoring data is within the emission limit values specified in the permit for 2025 reporting period.

**Alex Bowder**

Senior Officer - Southwest Wales Industry Regulation

[Alex.Bowder@cyfoethnaturiolcymru.gov.uk](mailto:Alex.Bowder@cyfoethnaturiolcymru.gov.uk)

**END OF REPORT**

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.