

Compliance Assessment Report CAR_NRW0050736

Permit being assessed: AB3233DW.

For: GP Biotec Ltd, **held by:** GP Biotec Ltd

At: Great Porthamel AD Plant, Talgarth, Brecon, Powys, LD3 0DL.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2025.

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

NRW Lead Officer: Rhydian Cox.

Report sent to: Compliance Manager, GP Biotec Ltd, on 02/03/2026.

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	C3 Minor	3.1.2
IR4C - Installations - Information - Notification	C3 Minor	4.3.1
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Action only (X)	
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
2	8

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
IR3A(2)	<p>ACTION 1: The Operator must improve operational practices and implement proactive measures to minimise the risk of future permit non-compliances, specifically in relation to Emission Limit Values associated with permitted emission points. The Operator must complete all necessary maintenance to ensure that emissions from Emission Point A1 remain compliant with the relevant ELVs set out in the permit.</p> <p>The Operator must also undertake further emissions monitoring to confirm that emissions have returned to, and are being maintained within, the permitted limits. The results of this additional monitoring must be submitted to Natural Resources Wales no later than 31 May 2026.</p>	31/05/2026
IR4C	<p>ACTION 2: GP Biotec Ltd must improve its operational practices and ensure that Natural Resources Wales is notified of all permit breaches, as well as any incidents or accidents that significantly affect or may significantly affect the environment, in accordance with the permit's notification procedures and within the specified timescales.</p>	Already completed
IR3A(2)	<p>ACTION 3: The Operator must provide a justification for the decision not to undertake monitoring at Emission Point A6. This justification must demonstrate that the selected approach is appropriate in accordance with Note 6 of reporting form Air 1 / 17/08/2022, and that emissions from this point are unlikely to impact sensitive receptors.</p> <p>The Operator must additionally provide evidence confirming the continued efficacy of the abatement equipment associated with Emission Point A6, and that the environment remains protected. Please submit the requested information to Natural Resources Wales no later than 31 March 2026.</p>	31/03/2026

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

CAR amended 02/03/2026 following identification of a typographical error

concerning emission points outlined in the compliance assessment. No amendments made to scores or any other sections of the report.

Annual Monitoring Returns 2025

This Compliance Assessment Report (CAR) has been issued in response to the submission of the 2025 Annual Monitoring Returns by **GP Biotec Ltd** for activities at Great Porthamel Anaerobic Digestion Plant, Talgarth, Brecon, Powys, LD3 0DL under permit **EPR/AB3233DW**.

Monitoring returns and reports for the following period(s) have been assessed in this CAR form:

- *Reporting of emissions to air for the year 2025*
- *Reporting of emissions to water (other than sewer) and land for the year 2025*
- *Reporting of other performance indicators for the year 2025*

This CAR was completed on **18 February 2025**. However, the date on the CAR form has been amended to **31 December 2025** to ensure the Compliance Classification Scheme (CCS) score is attributed to the correct financial year for billing purposes.

Compliance Assessment

Table S4.1 of the permit states that the 12 month reporting period for both emissions to air and emissions to water begins on **1 January**.

The 2025 annual reporting returns were submitted by the operator on **31 January 2026**. The annual submissions are in compliance with permit condition 4.2.3.

Emissions to Air

The operator submitted the *Reporting of emissions to air for the year 2025* in the agreed reporting format (*Form : Air 1 / 17/08/2022*).

The Emission Limit Value (ELV) specified in the permit for Oxides of Nitrogen (NO and NO₂ expressed as NO₂) for emission point A1 (CHP Exhaust) is 500 mg/m³. The reported monitoring result was 583 mg/m³. However, when the associated sampling uncertainty is taken into account, this exceedance falls within the permitted tolerance and the result can therefore be discounted.

The Emission Limit Value specified in the permit for Carbon Monoxide for emission point A1 (CHP Exhaust) is 1400 mg/m³. The reported monitoring result was 1458 mg/m³. However, when the associated sampling uncertainty is taken into account, this exceedance falls within the permitted tolerance and the result can therefore be discounted.

The Emission Limit Value specified in the permit for Oxides of Nitrogen (NO and NO₂ expressed as NO₂) for emission point A1 (CHP Exhaust) is 500 mg/m³. The reported monitoring result was 517 mg/m³. However, when the associated sampling uncertainty is taken into account, this exceedance falls within the permitted tolerance and the result can therefore be discounted.

Permit Condition 3.1.2 Breach

The Emission Limit Value specified in the permit for Total VOC's (including methane) for emission point A1 (CHP Exhaust) is 1000 mg/m³. The reported monitoring result is 1784 mg/m³. Accounting for the associated sampling uncertainty, this exceedance remains out of compliance with permitted limits.

Consequently, **GP Biotec Ltd** has been issued with a **Category 3 non-compliance** for breaching the emission limits stated in the permit. This has been scored in accordance with the Compliance Classification Scheme (CCS) Under Compliance Criteria **IR3A(2)**.

ACTION 1: The Operator must improve operational practices and implement proactive measures to minimise the risk of future permit non-compliances, specifically in relation to Emission Limit Values associated with permitted emission points. The Operator must complete all necessary maintenance to ensure that emissions from Emission Point A1 remain compliant with the relevant ELVs set out in the permit.

The Operator must also undertake further emissions monitoring to confirm that emissions have returned to, and are being maintained within, the permitted limits. The results of this additional monitoring must be submitted to Natural Resources Wales no later than **31 May 2026**.

Permit Condition 4.3.1 Breach

A Schedule 5 Part A notification was not submitted within the required 24-hour timeframe following the detection of a permit breach. Permit Condition 4.3.2 states:

“Any information provided under condition 4.3.1(a)(i), or 4.3.1(b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in Schedule 5 of this permit within the time period specified in that schedule.”

Emissions monitoring was undertaken on **6 February 2025**. In accordance with the permit, a Schedule 5 Part A and Part B notification should have been submitted to NRW immediately upon identification of the exceedance of the Emission Limit Values. As this did not occur, **GP Biotec Ltd** has been issued with a **Category 3 non-compliance** for failure to notify NRW of a permit breach, in contravention of the relevant permit conditions.

This non-compliance has been classified and scored in accordance with the Compliance Classification Scheme under Compliance Criteria **IR4C**.

ACTION 2: GP Biotec Ltd must improve its operational practices and ensure that Natural Resources Wales is notified of all permit breaches, as well as any incidents or accidents that significantly affect or may significantly affect the environment, in accordance with the permit's notification procedures and within the specified timescales.

All other reported parameters were within the Emission Limit Values specified in the permit.

No additional exceedances were identified.

Emission Point A3

No monitoring results have been provided for Emission Point A3 Emergency Stack Flare. Note 5 outlines the following; *Monitoring of flare emissions is only necessary when the flare is operated in excess of 10% of the time.*

Emission Point A6

No monitoring results have been provided for Emission Point A6 (Liquid Waste Tank At Reception Area Activated Carbon Filtration System). Note 6 of reporting form *Air 1 / 17/08/2022* outlines the following; *Where emissions are unlikely to impact on sensitive receptors, operators can choose whether to monitor for odour or ammonia and hydrogen sulphide. Operators will need to justify that their choice demonstrates the continued efficacy of their abatement equipment and that the environment is protected.*

ACTION 3: The Operator must provide a justification for the decision not to undertake monitoring at Emission Point A6. This justification must demonstrate that the selected approach is appropriate in accordance with Note 6 of reporting form *Air 1 / 17/08/2022*, and that emissions from this point are unlikely to impact sensitive receptors.

The Operator must additionally provide evidence confirming the continued efficacy of the abatement equipment associated with Emission Point A6, and that the environment remains protected. Please submit the requested information to Natural Resources Wales no later than **31 March 2026**.

Emissions to Water

The Operator submitted the Reporting Emissions to Water (Other Than Sewer) and Land return for the year 2025 in the agreed reporting format (*Form: Water 1 / 09/02/2021*). Nil returns were provided for emissions to water. The Operator has confirmed that the W1 emission point has not been utilised since the permit was issued, with all captured surface water being reused within the system.

The Operator must inform the site officer if a decision is made to reinstate the use of any permitted discharge points.

Performance Reports

Condition 4.2.2 of the permit states that reports on the performance of the activities over the previous year shall be submitted to NRW by **31 January**.

The operator submitted the 2025 annual performance reports on **31 January 2026** in the agreed reporting form (*Form : Performance 1 / 30/01/2024*) in line with condition 4.2.2(c).

- **No issues were identified** with the submitted information.

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

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.