

Compliance Assessment Report CAR_NRW0050377

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: Other,

Reason: Incident Response (Incident number 2507888).

On: 31/12/2025 - 09/04/2026.

Parts of permit assessed: 1.1 & 3.2 & 4.3..

NRW Lead Officer: Rhydian Cox, accompanied by Kirsty Thomas.

Report sent to: SHE Manager, The First Milk Cheese Company Ltd, on 09/04/2026.

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)	
IR1A - Installations - Management - General Management	Assessed (A)	
IR1A - Installations - Management - General Management	Assessed (A)	
IR3A(3) - Installations - Emissions and monitoring - Emissions to land	Assessed (A)	
IR4C - Installations - Information - Notification	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

This compliance assessment report (CAR) details Natural Resources Wales (NRW) review of the information submitted by the operator in response to the actions set in CAR_NRW0049269.

ACTION 1: *Conduct further investigations to accurately determine if the road drain referenced has connectivity to Merlin's Brook, and provide a detailed response supported by appropriate evidence, including photographic documentation.*

The operator advised that the initial response referenced Dŵr Cymru Welsh Water drainage network plans; however, these plans were inadvertently omitted from the original correspondence. The response also described investigations commissioned by First Milk, which included dye-tracing of the drain in question. No dye was observed within the receiving watercourse during this investigation. The outcome was therefore inconclusive. Photographic evidence relating to this investigation was provided.

Following review, the operator was requested to submit the missing drainage network plans and to undertake further investigations to conclusively establish the discharge point of the drain. Additional investigative works were subsequently completed with input from National Grid, Dŵr Cymru Welsh Water and West Wales Drainage. These works included the deployment of cameras within the drainage system; however, the full extent of the drainage run could not be confirmed. Further dye-tracing exercises were also undertaken, with no evidence of dye detected within Merlin's Brook.

Conclusion:

Although investigative findings suggest a potential pathway between the road drain and Merlin's Brook, no conclusive evidence was identified to confirm a direct hydrological connection. Based on the results of the investigations undertaken, it is assessed that the alleged spill was unlikely to have been of sufficient volume or connectivity to result in pollution of Merlin's Brook. On the basis of the information submitted and reviewed, this **action is deemed complete.**

ACTION 2: *Carry out further investigations to establish the root cause of the incident, and provide Natural Resources Wales with a comprehensive report detailing the findings. The operator must ensure they implement additional preventative measures based on the root cause findings.*

First Milk confirmed that the root cause of the incident was attributable to deficiencies in

staff and contractor training and communication. Following completion of a root cause analysis, First Milk has implemented a range of corrective and preventative measures aimed at preventing recurrence.

These measures include enhanced training for both First Milk employees and appointed transport partners, GDL, to improve operational awareness and communication. Amendments have also been made to the control measures associated with the Clean-in-Place (CIP) system, which are intended to reduce the risk of loss from the system. In addition, supplementary tertiary containment measures have been introduced through the deployment of hydropad sandbags.

First Milk has further confirmed its intention to invest in significant improvements to the site's tertiary containment infrastructure. Details of these proposed improvements have been submitted as part of a permit variation application, which is currently under determination by Natural Resources Wales.

Conclusion:

The actions undertaken and proposed by First Milk demonstrate that the underlying causes of the incident have been identified and addressed through a combination of procedural, operational and physical control improvements. Subject to the outcome of the permit variation determination, these measures are considered appropriate to reduce the likelihood of a similar incident occurring in the future. On the basis of the information submitted and reviewed, this **action is deemed complete**.

ACTION 3: *Based on the findings of ACTION 2 (see above), review and update management plans accordingly.*

A summary of the root cause analysis was provided, which identified the incident as being attributable to deficiencies in training and effective communication. The corrective actions and preventative measures arising from this analysis were outlined under the response to Action 2. The operator confirmed that, following completion of the root cause investigation, updates were made to the site's management plans to address the identified failings.

Natural Resources Wales subsequently requested submission of supporting documentation to evidence the changes implemented. In response, the operator provided the relevant documentation, including *CIP 200 Low Flow Watchdogs*, which details modifications made to the CIP system to reduce the likelihood of effluent loss. In addition, documentation produced by the transport contractor, GDL (*Unloading and CIP Process – First Milk*), was submitted. This document sets out revised procedures for GDL operators to minimise the risk of recurrence.

Conclusion:

The documentation provided demonstrates that the operator has taken appropriate steps to address the identified root causes through revisions to management plans, operational controls and contractor procedures. The measures implemented are considered suitable to reduce the risk of a similar incident occurring in the future, and on the basis of the information submitted and reviewed, this **action is deemed complete**.

ACTION 4: *Undertake and evidence accordingly the intended remedial actions outlined within the Schedule 5 part B to prevent reoccurrence of the issue.*

The actions outlined within the Schedule 5 Part B notification included the implementation of additional controls to the CIP system, deployment of sandbags as a precautionary measure, exploration of further containment options, and the provision of enhanced training for First Milk staff and contractors. Completion of these additional actions has been detailed within the operator's response to Action 2.

Conclusion:

The measures identified within the Schedule 5 Part B notification have been appropriately implemented and evidenced through the operator's response. Collectively, these actions address both the immediate risks and underlying causes associated with the incident and are considered suitable to reduce the likelihood of recurrence. On this basis, the **action is deemed complete**.

ACTION 5: *Improve the current site NRW notification procedure and include contingency measures in the event of staff absence (weekends/bank holidays/reduced operational activity etc) and submit evidence to NRW of the changes accordingly. First Milk must notify NRW of all permit breaches (or activities that give rise to an incident or accident which significantly affects or may significantly affect the environment) via the correct notification procedure and within the timeframes outlined within the permit.*

The operator confirmed that revised internal training and guidance now require all permit-related issues to be escalated immediately to the Site, Health and Environment (SHE) Manager, with NRW being notified at the earliest opportunity thereafter. To mitigate the risk of delayed notification during periods of absence, an out-of-office notification has been established for the SHE Manager role. In addition, an internal briefing note was issued to senior staff to formally communicate these changes, with supporting screenshots provided as evidence of implementation.

Following review, NRW made a further request that these procedural changes be formally incorporated into the site's Accident Management Plan (AMP) and any other relevant management documentation. An updated AMP, clearly highlighting the recent amendments, was subsequently submitted by the operator and reviewed by NRW.

Conclusion:

The operator has demonstrated that appropriate changes have been made to escalation, notification and management arrangements for permit-related incidents. The incorporation of these changes into the site AMP provides assurance that revised procedures are embedded within the site's management system. The operator must ensure that Natural Resources Wales is notified of any incidents, accidents, or permit breaches, in line with the requirements set out in Condition 4.3 of the environmental permit. This **action is deemed complete**.

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.