

Malcolm Dines,
Natural Resources Wales,
Plas Gwendraeth,
Cross Hands Business Park,
Carmarthenshire
SA14 6RE

Date 3rd February 2026

Ref Derwent Renewable Power Limited CAR_NRW0050083

Dear Malcom

Further to your email of 4th December 2025 and associated the associated CAR report: CAR_NRW0049874 please see the following:

1. W1A: Roger Hughes is booked onto a WMITAB refresher course this month as per the Appendix 1 sent in the last correspondence.

Marches Biogas are currently overseeing the process of bringing the plant back on line and will remain on site for a minimum of the 20% of the working week as deemed necessary for a TCM to maintain appropriate oversight of the plant.

Longer term the detailed Daily, Weekly, Monthly and Annual service programs will be used when the plant is operational to demonstrate compliance and record planned and unplanned maintenance activities.

2. W3B: All pumps and controls are operational. Dirty water is pumped to the bulk storage tank. The only drainage off site is if clear rain water is captured at times of heavy rain and if the concrete areas are clear and the resulting water is clear water then it can be manually pumped from site.

Flue Gas emissions testing from the CHP and Boiler are booked in with Element Materials Technology once the plants are operational.

3. Site Notice Board: Installed at entrance to site.
4. W1A Report re failure of Digester: As part of assessing the failure of the Digester NFU Mutual appointed Simon Batt of Hawkins Consulting engineers (simon.batt@hawkins.biz) to assess the failure and compile a report. Whilst the report is an internal Hawkins / NFU document and has not been shared due to its commercial nature the key wording of the conclusion was as follows:

We considered the cause of damage to be the structural failure was due to the varying consistency of the digestate in the AD tank, which has caused internal flow ports to become blocked, leading to a difference in the digestate level in the outer ring relative to the inner ring.

A difference in digestate level would exert pressure on the internal wall, leading to the structural failure.

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We also considered that the issues with performance of the AD plant and health of the digestate are linked to events in 2023, from which the AD plant never fully recovered.

NFUM have agreed to consider the claim under the SUDDEN AND UNFORSEEN DAMAGE to PLANT peril as per the Engineering Insurance cover, which in turn triggers the Business Interruption Cover under the Machinery Breakdown Cover Extension only.

5. W1A: Inspection Check Lists:
 - a. Inspection Check lists: PDF of inspection template for when the plant was non-operational (Nov 25) attached.
 - b. Separate email sent as per Audit undertaken by loss adjuster at time of failure with sample (20off) of inspections completed during 2024 when the plant was on line until the time of failure at the end of November 2024
 - c. Consultation with the manufacturer of the Silage clamp panels, the installer and cross reference with NRW guidance: <https://naturalresources.wales/guidance-and-advice/business-sectors/farming/silage-slurry-and-other-livestock-manure-storage> has not flagged any requirement or recommendation for camera inspections of effluent channels. The daily inspection report has been amended to include a check to ensure that the effluent channels are free of obstructions.
6. Waste returns: The acknowledged error re using the Environment Agency forms instead of the NRW forms has been corrected and the returns for the outstanding periods have been submitted.
7. The current environmental management system for the plant is attached.
8. The current tonnages on site as of 3rd February 2026 are:
 - a. Poultry Litter: 384Tonnes.
 - b. Storage Lagoon: 7500m³
 - c. Bulk store: 660m³
 - d. Buffer: 20m³

We trust the above covers the points raised on the above CAR but look forward to going through the details on your visit to help ensure all parties can build confidence in the safe and efficient operation of the site.

Kind regards
Tom



Tom Corbett
Hillgreen Energy

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