

Compliance Assessment Report CAR_NRW0051608

Permit being assessed: AB3097HG.

For: Unit 1- Crugmore Farm, **held by:** M D Recycling Limited

At: Crugmore Farm, Penparc, Cardigan, Ceredigion, SA43 1RD.

Type of assessment: Audit,

Reason: Routine.

On: 16/04/2026 between 11:20 and 14:30.

Parts of permit assessed: All.

NRW Lead Officer: Malcolm Dines, accompanied by Luke Taylor.

Report sent to: Marc Davies, Director and Technically Competent Manager, on 27/04/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	C3 Minor	1.1.1
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W3E - Waste - Emissions and monitoring - Monitoring	Action only (X)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W3A(1) - Waste - Emissions and monitoring - Emissions to water	Assessed (A)	
W4B - Waste - Information - Reporting	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
1	4

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
W1A	Review and update Environment Management System for this permit to take into account the following requirements: <ol style="list-style-type: none"> 1) All wastes accepted under this permit are classified in accordance with the guidance document, WM3 2) All "mirror-entry" wastes accepted under this permit are tested ensure that they are classified correctly, in accordance with WM3 3) All "mirror-entry" wastes exported from this permit are tested and classified in accordance with WM3. 4) Changes to the Bioaerosol Monitoring to allow it to be carried out twice a year, in June and September. 	26/07/2026
W1A	All waste classification testing records must be retained in accordance with the permit	28/04/2026
W1A	Ensure that you keep detailed records of the amount of waste used in the Deposit for Recovery Activity and you must have records to show that the wastes have been classified in accordance with WM3	28/04/2026
W1A	Detail how you will store wastes pending disposal or recovery elsewhere, in accordance with the Natural Resources Wales guidance document, "How to Comply with your Environmental Permit", that must include the following: <ol style="list-style-type: none"> 1) Maximum storage times 2) Maximum storage capacities for specified storage areas and the facility as a whole 3) Maximum storage heights to prevent or minimise the emission of dust 4) Procedures to ensure that storage times and capacities are not exceeded 5) How you will manage site throughput 6) Contingency plans in the event that the maximum storage capacity is reached and in the event that applications to authorise site extensions and new processes are not approved by 31 December 2027 	26/07/2026
W3E	ensure that the management system for this permit is updated to reflect the changes in bioaerosol monitoring	28/04/2026

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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 was a routine compliance visit undertaken by Malcolm Dines (Waste Regulation Officer) and Luke Taylor (Senior Waste Regulation Officer). The officers met with Marc Davies (Director and Technically Competent Manager) who accompanied Luke Taylor on the site inspection. Malcolm Dines reviewed management procedures and records in the office.

Permit Breaches

W1A - General Management - Cat 3: Permit Condition 1.1.1

The Company have been given this Category 3 breach of the above permit condition as the company does not have adequate waste classification processes for incoming and outgoing wastes. A review of the quarterly waste returns for 2025 show that "mirror-entry" wastes: 17 01 07; 17 01 01; 17 05 04 and 17 03 02 were accepted under this permit as non-hazardous however, when asked, the company did not have any records to demonstrate that any of these wastes had been tested to demonstrate that they were actually non-hazardous. The company must ensure that it has adequate procedures so that either, the holder of the waste provides an appropriate waste analysis, or the company undertakes the analysis itself. The company must also ensure that there are procedures in place to ensure that all "mirror-entry" wastes exported from the site are tested and classified in accordance with WM3. All waste classification testing records must be retained in accordance with the permit.

Action: Review and update Environment Management System for this permit to take into account the following requirements, **by 26 July 2026**

- All wastes accepted under this permit are classified in accordance with the guidance document, WM3
- All "mirror-entry" wastes accepted under this permit are tested ensure that they are classified correctly, in accordance with WM3
- All "mirror-entry" wastes exported from this permit are tested and classified in accordance with WM3.
- Changes to the Bioaerosol Monitoring to allow it to be carried out twice a year, in June and September.

Action: All waste classification testing records must be retained in accordance with the permit **with immediate effect**

Waste returns for the permit, for 2025 were reviewed before the site visit and show that 9,500 tonnes of inert wastes were accepted under this permit, but none had been exported.

In 2022 a volumetric assessment was undertaken to determine the amount of wastes that had been imported into the Deposit for Recovery activity, which showed that another 1,592 tonnes was required to complete the revised site layout. This activity was discussed during this compliance visit and it was confirmed that no further material has been used in this activity since the volumetric assessment was undertaken.

Action: ensure that you keep detailed records of the amount of waste used in the Deposit for Recovery Activity and you must have records to show that the wastes have been classified in accordance with WM3 **with immediate effect**

As noted above, the review of the waste returns for 2025 show that no inert waste has been used in the the Deposit for Recovery activity since the volumetric survey was carried out in 2022. Since 2022, 33,366 tonnes of inert wastes have been accepted under this permit, all of which is still on-site. The Landfill Directive limits the amount of time that wastes destined for recovery or treatment, can be stored at a site to, as a general rule, three years. During discussions at this compliance visit, the company explained that Planning Permission has been submitted to develop the site to expand the site and operations to allow further treatment of aggregates, ensuring more material is recovered and can be used as a substitute for quarried material. Once planning permission has been secured, the company stated that an application will be submitted for a permit or a permit variation to allow the company to treat waste using the new process however, at present you do not have sufficient space to store this much waste and still enable safe operations.

Action: Detail how you will store wastes pending disposal or recovery elsewhere, in accordance with the Natural Resources Wales guidance document, "How to Comply with your Environmental Permit", that must include to following **by 26 July 2026**

- maximum storage times
- maximum storage capacities for specified storage areas and the facility as a whole
- maximum storage heights to prevent or minimise the emission of dust
- procedures to ensure that storage times and capacities are not exceeded
- how you will manage site throughput
- contingency plans in the event that the maximum storage capacity is reached and in the event that applications to authorise site extensions and new processes are not approved by 31 December 2027

Other matters

Waste Returns

As noted above, the waste returns for the site for 2025 were assessed. No evidence of no compliance were recorded.

Fines

During the compliance visit, to production and storage of fines from both the aggregate processing area and the composting process was discussed. The review of the waste returns show that no fines had been exported from the site since 2022. The company explained that no inert waste has been treated since then and so no fines have been produced and all material screened from composting process is sent to the Standard Rules Permit. While plastics, metals and wood can be sent to the Standard Rules Permit, any fines produced in the composting process cannot be sent to the composting process. All

finest, both from the composting and aggregate processes must be securely stored in a clearly designated area and sampled in accordance with WM3 before being exported from the site. You must also keep detailed records of this process.

Composting

The composting activity process around 5,000 tonnes of green waste per annum to PAS100 standard. The PAS100 process was last assessed in October 2025 by the Organic Farmers and Growers C.I.C (reg. No: PR289) on behalf of REAL and the certification is valid from 30/11/2025 until 30/11/2026. All the compost is used on a single agricultural holding, this is part of the PAS100 process

Bioaerosol Monitoring

The bioaerosol monitoring requirements for this permit was assessed prior to the site visit, with all monitoring requirements being compliant. Bioaerosol monitoring is being undertaken twice a year, a reduction from three times a year as required by the permit. This change was verbally agreed by myself in 2024, but I never confirmed this in writing and so this is not considered to be a non-compliance. It is agreed that bioaerosol monitoring for this permit can be reduced to twice a year however, monitoring must be undertaken during June and September. Natural Resources Wales may change both the monitoring periods and frequency of monitoring in the future to ensure environmental risk from the composting process is adequately addressed.

Action: ensure that the management system for this permit is updated to reflect the changes in bioaerosol monitoring **with immediate effect**

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order 2012.

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

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A(1) – Emissions to water
- W3A(2) – Emissions to air
- W3A(3) – Emissions to land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – 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.