

## Compliance Assessment Report for:

# STANDALONE MEDIUM COMBUSTION PLANT AND SPECIFIED GENERATORS

<b>Permit number</b>	<b>DB3394CU</b>	<b>Operator name</b>	Dragon Fruit Holdings Limited
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<b>Site name</b>	DB3394CU-Dragon Fruit Holdings Limited
<b>Site address</b>	Dragon Fruit Holdings Limited Edwards Business Park, Llantrisant, Pontyclun, CF72 8QZ
<b>Type of assessment</b>	EMS review

<b>Date of assessment</b>	19/06/2026	<b>Time in</b>	09:00	<b>Time out</b>	11:00
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<b>Parts of permit assessed</b>	1.1.1(a)
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<b>NRW Lead officer</b>	Geraint Harris	<b>Accompanied by</b>	/
<b>Report sent to – Name and position</b>	Mike Edwards	<b>Date</b>	19/06/2026

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
MCP1A General management	A - Assessed, no evidence of non-compliance	1.1.1
Choose an item.	Choose an item.	
Choose an item.	Choose an item.	
Choose an item.	Choose an item.	
Choose an item.	Choose an item.	
Choose an item.	Choose an item.	

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

<b>Total number of non-compliances recorded</b>
0

## 2. What action is required?

Criteria	Action needed	Complete by

Action criteria codes are listed in the 'Important information' section below.

## 3. What will happen next?

**You are non-compliant with your permit.**

**We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.**

## 4. Details of our assessment

### Dragon Fruit Holdings Limited

#### EPR-DB3394CU

The amount of detail required within an environmental management system should be proportionate to the complexity and environmental risk of the activity being undertaken. In line with UK government guidance, simpler and lower-risk installations do not require highly complex or heavily layered management systems, provided that the key elements of control, compliance, and monitoring are in place.

In this case, Dragon Fruit Holdings Ltd operates a relatively small combustion activity under the Medium Combustion Plant Directive (MCPD), consisting of three biomass boilers supplying heat across a single industrial estate. The activity is limited in scope, geographically contained, and involves well-understood processes such as fuel delivery, storage, combustion, and ash handling. While there are identifiable environmental risks, particularly relating to emissions to air and fuel handling, these are typical of this type of installation and are mitigated through established controls and maintenance arrangements.

The EMS reflects this level of complexity. It includes the core components expected by guidance, such as a defined scope, identification of environmental aspects, a legal register, monitoring parameters, emergency procedures, and roles and responsibilities. Although some areas could be strengthened, particularly in terms of procedural detail and explicit linkage to permit conditions, the overall structure demonstrates that environmental risks have been identified and are being managed through appropriate controls.

Given the relatively low complexity and risk profile of the site, it is reasonable that the EMS does not adopt the same level of detail or formalisation that might be expected for a larger or higher-risk installation. The system provides sufficient information to describe how the activity is managed, how compliance is maintained, and how performance is monitored. It also includes mechanisms for review and continual improvement, which are appropriate for the scale of operations.

On this basis, and taking into account the proportionality principles set out in government guidance, the EMS for Dragon Fruit Holdings Ltd can be considered appropriate for a small

MCPD installation. It demonstrates a suitable level of control and oversight relative to the nature of the activity, while avoiding unnecessary complexity.

However, a number of proportionate improvements could be made to strengthen the EMS while keeping it suitable for a small MCPD installation.

Firstly, Dragon Fruit could significantly improve clarity around compliance by introducing a simple permit compliance table. One of the main gaps in the current EMS is the lack of a clear link between the system and the environmental permit. A short table setting out each permit condition, what it requires, how the site complies, what records are kept, and who is responsible would provide a clear line of sight between regulatory requirements and site controls. This addition would not need to be extensive, one or two pages would be sufficient, but it would make it much easier to demonstrate compliance during audits and inspections, and would help reduce the likelihood of regulatory queries.

Secondly, the EMS would benefit from converting key operational activities into short, structured procedures. While the document already contains narrative descriptions of processes such as boiler operation and fuel handling, these are not currently presented as controlled procedures. Producing concise, one-page procedures for key activities, such as normal operation, start-up and shutdown, fuel delivery checks, ash handling, and emissions monitoring, would improve consistency and auditability. These procedures do not need to be overly detailed; simple bullet-point formats would be sufficient and more appropriate for a site of this scale.

In addition, introducing a basic monitoring plan would strengthen the system considerably. Although the EMS identifies parameters that are monitored, it does not clearly define how often monitoring takes place or what actions are required if issues arise. A straightforward table outlining each parameter, monitoring frequency, applicable limits or requirements, and the action to be taken if performance falls outside expectations would address this. For example, emissions could be linked to permit requirements, fuel moisture checked on delivery, and visual emission checks carried out daily. This approach would improve control without adding unnecessary complexity.

Another important improvement would be to formalise the process for incident reporting, particularly in relation to notifying NRW. At present, this is only addressed at a very high level. A short procedure should be added to define what types of incidents must be reported (such as emission exceedances, abnormal operation, or environmentally significant spills), who is responsible for reporting, how this is done, and the expected timeframe (for example, reporting without delay). This is a key regulatory expectation and can be addressed with minimal additional content.

Similarly, the EMS would benefit from the inclusion of a simple complaints procedure. Currently, there is no formal mechanism for handling complaints. A proportionate approach would involve logging all complaints, recording key details such as date and nature of the issue, investigating the cause, documenting any actions taken, and responding where appropriate. This could be implemented through a single log sheet supported by a brief explanatory procedure.

The treatment of abnormal operations could also be improved. While start-up and shutdown activities are described, the EMS does not clearly define what constitutes abnormal operation or how it should be managed. Adding a short section to define abnormal conditions, such as visible smoke, alarms, or equipment failure, and setting out required operator actions, including when to shut down plant and when to report incidents, would strengthen environmental control, particularly in relation to emissions.

The audit process could also be made slightly more structured without adding unnecessary complexity. While the EMS commits to internal audits, this could be strengthened by introducing a simple checklist covering key areas such as permit compliance, monitoring

records, training, and incidents. Audit findings, actions, and close-out should be recorded to demonstrate continual improvement.

Overall, these improvements would enhance the robustness of the EMS while remaining proportionate to the scale and risk profile of a small MCPD installation. The focus should be on making the system clearer, more practical, and easier to demonstrate compliance, rather than introducing unnecessary complexity or bureaucracy.

**End.**

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 only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

**Full list of Medium Combustion Plant and Specified Generator criteria (used in section 1 and 2):**

**1: Management**

- MCP1A General management

**2: Operations**

- MCP2A Permitted activities
- MCP2B The site
- MCP2C Operating techniques
- MCP2D Improvement programme
- MCP2E Pre-operational conditions

**3: Emissions and Monitoring**

- MCP3A Emissions to water, air or land
- MCP3B Emissions of substances not controlled by emission limits
- MCP3C Odour
- MCP3D Noise and vibration
- MCP3E Monitoring
- MPC3F Fire

**4: Information**

- MCP4A Records
- MCP4B Reporting
- MCP4C Notification

**Enforcement response**

Any permit condition non-compliance 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 20 working days to let you know if we agree to your request.

**What do I do if I disagree with the report or have a complaint?**

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk) for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at [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.