

Compliance Assessment Report CAR_NRW0052062

Permit being assessed: AB3493CS.

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

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

Type of assessment: Report/Data Review,

Reason: Routine.

On: 09/06/2026.

Parts of permit assessed: Site Activities; Fire Prevention, Management System.

NRW Lead Officer: Malcolm Dines.

Report sent to: Marc Davies, Director, on 09/06/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2A - Waste - Operations - Permitted activities	C3 Minor (Suspended)	2.1.1
W3G - Waste - Emissions and monitoring - Fire	C3 Minor (Suspended)	3.4.1

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

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

Criteria	Action needed	Complete by
W2A	All shredded wood waste must be removed from site and waste sampling and transfer notes must be submitted to Natural Resources Wales	28/07/2026
W3G	Submit an updated Fire Prevention and Mitigation Plan, written in accordance with the latest guidance and which, as a priority, addresses the following points: 1) Detailed explanation of how wastes are managed at the	28/07/2026

Criteria	Action needed	Complete by
	site 2) Details regarding the minimum separation/fire break distances required Information about potential combustion products and their impacts on sensitive receptors 3) Improve the legibility of site plans 4) Provide building plans that detail access points, fire exits & location of utilities 5) Ensure the isolation points for utilities are included on a site plan. 6) Provide details on a site plan about separation distances in the Transfer building 7) Provide details on a site plan about fire walls 8) Provide the location of any POPs waste on site plans 9) Provide contact details and actions they must take, for those responsible for sensitive receptors	

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

This was a routine review of data undertaken by Malcolm Dines (Waste Regulation Officer) following the requirement for the operator to submit information as compliance actions on Compliance Report CAR_NRW0051609, dated 7 May 2026.

Permit Breaches

W2A - Permitted Activities - Cat 3 (Suspended): Permit Rule 2.1.1

The company has been given this suspended category 3 breach under rule 2.1.1 as it has not complied with the action on Compliance Report CAR_NRW0051609, dated 7 May 2026 requiring all shredded wood waste to be removed from site, and waste sampling and transfer notes to be submitted to Natural Resources Wales by 7 June 2026.

Following an earlier phone conversation with the company's consultant, a formal response was submitted by email on 6 June 2026, explaining that it has been very difficult arranging an outlet for the shredded treated wood currently on site and it has been let down on at least two collections that were arranged in the intervening period since the compliance visit. An email from another outlet was included with the email detailing a collection commitment enabling the waste to be removed by 17 July 2026 and requesting an extension of the compliance action deadline to this date.

Action: All shredded wood waste must be removed from site and waste sampling and transfer notes must be submitted to Natural Resources Wales **by 28 July 2026**

W3G - Fire - Cat 3 (Suspended): Permit Rule 3.4.1

The company has been given this Action Only breach of Rule 3.4.1 because the Fire Prevention and Mitigation Plan in use at the time of the compliance visit on 16 April 2026 (as required to be submitted by Compliance Report CAR_NRW0051609, dated 7 May 2026) does not meet the requirements of the latest guidance. The deadline for this compliance action was 7 July 2026 and is why this permit breach has been suspended.

Section 5 of the guidance details what the Fire Prevention and Mitigation Plan must include, and my review of the document submitted has identified the following areas that do not meet the requirements:

- There is no information about the amount of waste being received each day and limited information about how the waste is managed
 - The plan must demonstrate how the storage of all the waste on site is recorded and managed.
 - There must be robust waste acceptance procedures to prevent receipt of unauthorised waste, or waste that the site does not have the capacity to store or treat.
 - Contingency plans in the event the site reaches it's safe storage capacity
 - Demonstrate good stock rotation for all stored materials and show how this is monitored and implemented daily.
- There is no information about the minimum separation/fire break distance required between all waste and/or baled waste stacks, and between buildings and waste and/or baled waste stacks.
- There was no information regarding combustion products and emissions (to air, land and water) from fire and the emergency response. While there was an assessment of sensitive receptors, I was not able to find any information about the potential impact on the community, critical infrastructure and the environment, and how they will be minimised.

While detailed site plans that are large enough and drawn to scale were submitted, a lot of the details are very difficult to read as they are written over other writing or drawings. Where details are included on site plans, please revise the plans to ensure that all information is legible. In addition, the following required information has not been included in the plans:

- There is no detail about the layout of buildings - no details of access points, fire exits & location of utilities
- Isolation points for utilities have not been included
- The details about separation distances, at least not in the Transfer building
- No information about fire walls
- The location of any POPs waste has not been included
- I was not able to find contact details and actions they must take, for those responsible for sensitive receptors.

The submitted plan also references version 16 of the guidance, but that is dated 2019 and is not the current version of the guidance that is published on the Natural Resources Wales

website. Please ensure that you refer to the latest version of the guidance.

Action: Submit an updated Fire Prevention and Mitigation Plan, written in accordance with the latest guidance and which, as a priority, addresses the following points **by 28 July 2026**

- Detailed explanation of how wastes are managed at the site
- Details regarding the minimum separation/fire break distances required
- Information about potential combustion products and their impacts on sensitive receptors
- Improve the legibility of site plans
- Provide building plans that detail access points, fire exits & location of utilities
- Ensure the isolation points for utilities are included on a site plan.
- Provide details on a site plan about separation distances in the Transfer building
- Provide details on a site plan about fire walls
- Provide the location of any POPs waste on site plans
- Provide contact details and actions they must take, for those responsible for sensitive receptors

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.