

Compliance Assessment Report CAR_NRW0051868

Permit being assessed: AB3893HE.

For: Troedrhiwgwynau Farm, **held by:** Alun Hughes

At: Troedrhiwgwynau Farm, Comins Coch, Aberystwyth, Ceredigion, SY23 3BE.

Type of assessment: Site Inspection,

Reason: Routine.

On: 12/05/2026 between 10:50 and 11:45.

Parts of permit assessed: See criteria listed below.

NRW Lead Officer: Luke Taylor.

Report sent to: Alun Hughes, Site Operator, on 12/06/2026.

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	1.1.4

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	Obtain the relevant TCM continued competency qualification or appoint a suitably qualified person to act as TCM	31/07/2026

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.

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

This inspection was conducted on Tuesday 12th May 2026 by Luke Taylor (Senior Officer - Waste Regulation) of Natural Resources Wales.

The site was operational at the time of the inspection and the weather was dry but overcast.

The officer was accompanied throughout by the site operator, Alun Hughes.

W1A General Management - Permit Condition 1.1.4 - Category 3

You have been scored for the above breach as your site is still without a qualified technically competent manager (TCM). The above permit condition states that 'The operator shall comply with the requirements of an approved competency scheme'.

Following the expiry of your qualification in 2018, the site has been operating without a TCM. This has been highlighted on all of the below compliance assessment reports, with actions issued each time to resolve the breach not being met.

- Compliance Assessment Report CAR_NRW0037286 (January 2021)
- Compliance Assessment Report CAR_NRW0037814 (March 2021)
- Compliance Assessment Report CAR_NRW0038277 (May 2021)
- Compliance Assessment Report CAR_NRW0044086 (February 2024)
- Compliance Assessment Report CAR_NRW0045472 (November 2024)

During this inspection you stated that you had attempted the continued competency exam but had been unsuccessful. You confirmed that no further attempt had been booked, nor had you arranged for the services of a suitably qualified person to act as TCM cover.

Owing to the repeatedly failure to comply with the above permit condition, a decision has been made to issue you with a notice under Regulation 36 of the Environmental Permitting (England and Wales) Regulations 2016. You are required to obtain the relevant continued competency award or arrange for the services of a suitably qualified person to act as the site TCM. The deadline for compliance with the notice is **Friday 31st July 2026**.

As laid out in the notice, failure to comply with this notice is an offence under Regulation 38(3) of the Environmental Permitting (England and Wales) Regulations and without prejudice to the requirements of the notice, failure to comply with a condition of an environmental permit is an offence and may result in legal action being taken against you.

ACTION - Obtain the relevant continued competency award or arrange for the services of a suitably qualified person to act as the site TCM. Deadline - Friday 31st July 2026.

If you wish to discuss any aspect of this compliance assessment report, please contact me:

luke.taylor@cyfoethnaturiolcymru.gov.uk

Regards,
Luke Taylor

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.