

Compliance Assessment Report CAR_NRW0052314

Permit being assessed: AB3697CN.

For: Radnor Hills, **held by:** Radnor Hills Mineral Water Company Ltd

At: Radnor Hills Water, Heartsease, Knighton, Powys, LD7 1LU.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 09/07/2026.

Parts of permit assessed: See below.

NRW Lead Officer: Libby Hughes.

Report sent to: Environmental Manager, Environmental Manager, on 03/08/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Installations - Information - Reporting	C3 Minor	4.2.3
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR4C - Installations - Information - Notification	Action only (X)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR1A - Installations - Management - General Management	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
4	16

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
IR4B	See Action 1 below.	28/10/2026
IR3A(1)	See Action 2 below	07/08/2026
IR3A(1)	See Action 2 below	07/08/2026
IR4C	See Action 2 below	07/08/2026
IR3A(1)	See Actions 3 and 4 below	07/08/2026
IR1A	See Action 5 below	28/10/2026

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 Compliance Assessment Report (CAR) has been completed following the submission of Q1 data (January - March), Q2 monitoring data (April - June) and two Schedule 5 Notification Forms to Natural Resources Wales (NRW), on 19th June and 22nd June 2026.

Quarter 1 Monitoring - January - March 2026

IR3A(1) - Emissions to Water

January 2026 - All emissions are reported as being within the limits specified in permit condition 3.5.1 and table S3.1

February 2026 - All emissions are reported as being within the limits specified in permit condition 3.5.1 and table S3.1

March 2026 - All emissions are reported as being within the limits specified in permit condition 3.5.1 and table S3.1

IR3E - Monitoring

Monitoring was carried out in compliance with permit condition 3.5.1 and point source emission table S3.2

IR4B - Reporting

It is a requirement of permit condition 4.2.3 that all monitoring reports shall be submitted to NRW monthly, within 28 days of the end of the monitoring period, unless otherwise agreed in writing with NRW.

It has previously been agreed in writing that returns may be submitted quarterly rather than monthly.

The returns for January and February 2026 were received on 28th April. It was noted that one of the parameters was missing for the January returns. This was resubmitted to NRW on 19th June 2026.

The returns for March 2026 were received on May 15th 2026.

Late returns for January and March is considered to be a breach of permit condition 4.2.3 and has resulted in a C3 score against Compliance Criteria IR4B above.

Action 1: Ensure that all future returns are submitted within the required timescale.

Quarter 2 Monitoring - April - June 2026**IR3A(1) - Emissions to Water****Returns for April 2026**

All emissions are reported as being within the limits specified in permit condition 3.5.1 and table S3.1

Returns for May 2026

Monitoring results for 26th May 2026 recorded Ammoniacal Nitrogen as 10.1 mg/l. The permitted level is 0.5 mg/litre. NRW considers the exceedance of the permitted level for Ammoniacal Nitrogen at emission point W1 to be a breach of permit condition 3.1.2. **A C3 non-compliance score has been applied against Compliance Criteria IR3A(1)- Emissions to water for Quarter 2 Monitoring**

The monitoring results for Total Nitrogen on 26th May 2026 were recorded as 29.5 mg/l. The permitted level is 20 mg/l. NRW considers the exceedance of the permitted level for Total Nitrogen at emission point W1 to be a breach of permit condition 3.1.2. **A C3 non-compliance score has been applied against compliance criteria IR3A(1)- Emissions to water for Q2 monitoring.**

All other emission limits for May 2026 were reported as being within the permitted limits.

Returns for June 2026

Monitoring results for 2nd June 2026 recorded Ammoniacal Nitrogen as 2.93 mg/l. The permitted level is 0.5 mg/litre. NRW considers the exceedance of the permitted level for Ammoniacal Nitrogen at emission point W1 to be a breach of permit condition 3.1.2. A C3 non-compliance score has already been applied against Compliance Criteria IR3A(1)- Emissions to water - for Quarter 2 Monitoring above, so no further score will be applied at this time.

Monitoring Results for Temperature for W1 on 26th June 2026 show temperature at W1 being recorded as 31.6C. The permitted level is 25C. NRW considers the exceedance of the permitted level for Temperature at emission point W1 to be a breach of permit condition 3.1.2. **A C3 non-compliance score has been applied against compliance criteria IR3A(1)- Emissions to water for Q2 monitoring.**

All other emission limits for June 2026 were reported as being within the specified limits, including the Total Nitrogen which although still showing quite a high on 2nd June, was within the permitted limits.

IR4B - Reporting

All Monitoring returns for April - June were received by NRW within the timescale set out in permit condition 4.2.3

April returns were received by NRW on 15th May 2026
May returns were received by NRW on 19th June 2026
June returns were received by NRW on 27th June 2026.

IR4C - Notifications

On 19th June NRW was notified, via a Schedule 5 Notification form, of elevated levels of Ammoniacal Nitrogen and Total Nitrogen recorded in the emissions to water.

The breaches coincided with the introduction of a new mixing facility at the effluent feed system, and the introduction of settled solids into the holding tank which impacted the effluent quality.

Schedule 5 Part B was submitted to NRW on 27th July. This is indicated that although levels of Total Nitrogen had returned to compliance by the following week (2nd June 2026) the Ammoniacal Nitrogen remained slightly elevated for another week, only returning to compliance by 9th June.

Action 2: Provide NRW with external compliance sample results for the week commencing 1st June 2026

On 22nd June NRW was notified, via a second Schedule 5 Notification form, that the discharge water temperature at W1 was recorded as 28C. The permitted maximum level is

25C.

It is noted that the initial temperature exceedance occurred during a extreme heat warning where ambient temperatures reached 35C.

A discussion with the operator on 13th July indicated that the W1 temperature emission was still above the permitted limit; this is consistent with a prolonged period of high ambient air conditions.

Action 3: Provide NRW with a full set of data for continuous W1 temperatures, commencing the day before temperatures exceeded permit levels, until the day they returned to compliance.

The operator voluntarily increased the frequency of monitoring of effluent temperature at W1 and along the discharge pathway to the River Teme. A drop in temperature was noted at each stage, and the temperature at which it discharges into the river was considerably below the temperatures observed at W1.

Action 4: Provide NRW with an updated set of temperature records for the additional monitoring carried out by the operator between W1 and the River Teme.

The operator should note that NRW does not grant derogations for prolonged periods of hot weather. Any request to allow an increase in W1 should come in the form of a permit variation application which would then initiate discussions with other relevant environmental organisations.

IR1A - General Management

Periods of high ambient air conditions are likely to increase in intensity and frequency due to Climate Change. The Operator should consider how the installation adapts to prevent future temperature exceedances.

Action 5: Assess and review possible future upgrades to the treatment process to maintain the temperature of W1 below the maximum permitted level. Include a review of the Climate Change Risk Assessment. Provide a written update of any amendments to NRW by 28th October 2026.

Outstanding Actions from CAR form CAR_NRW0050880

ACTION 2. The Operator must provided the outstanding testing and reporting for May 2025, by at the earliest opportunity and no later than 27 March 2026.

The outstanding testing and reporting data for May 2025 was submitted to NRW on 19th June. All emissions are reported as being within the limits specified in permit condition 3.5.1 and table S3.1

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

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – 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.