

Compliance Assessment Report CAR_NRW0052677

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: Site Inspection,

Reason: Routine.

On: 13/08/2026 between 12:00 and 12:15.

Parts of permit assessed: Waste Storage; Permit Boundary; Management System.

NRW Lead Officer: Malcolm Dines.

Report sent to: Marc Davies, Director, on 14/08/2026.

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(a)
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	C3 Minor (Suspended)	1.1.1(a)
W2D - Waste - Operations - The site	C3 Minor	2.2.1

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

Total non-compliances recorded	Total non-compliance score
3	8

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	Comply with actions required by compliance reports	15/08/2026
W1A	Provide evidence of when the company contracted the consultant to undertake this work	23/08/2026
W1A	Submit a copy of the updated site Management System,	30/09/2026

Criteria	Action needed	Complete by
	written in accordance with the Natural Resources Wales guidance document, "How to Comply with your Environmental Permit", that includes the following information: 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 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. 6) the changes in bioaerosol monitoring	
W2D	Reduce the size of the inert waste stockpile located between the composting activity and the Anaerobic Digestion plant, so that it no longer extends outside the permit boundary	30/09/2026

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 an unannounced routine compliance visit undertaken by Malcolm Dines (Waste Regulation Officer), who met with Marc Davies (Director and Technically Competent Manager). This site visit was to assess compliance with actions set out on compliance assessment report CAR_NRW0051608, dated 27 April 2026. The weather was dry and bright and due to the drought conditions the site track was very dusty.

Permit Breaches

W1A - General Management - Cat 3: Permit Condition 1.1.1(a)

The Company have been given this Category 3 breach of the above permit condition because it has failed to comply with actions required by compliance report

CAR_NRW0051608, dated 27 April 2026 on which a deadline of 26 July 2026 was set to

update the site Management System to include details of how wastes will be stored pending disposal or recovery elsewhere.

The failure to comply with the required compliance actions indicates that either the site Management System is inadequate, as it does not address the requirement to take action when the company is notified of a non-compliance or, if the Management System is adequate, the company is failing to operate in accordance with the Management System.

On 28 July 2026, two days after the deadline, I received an email from a consultant acting on behalf of M D Recycling Ltd., requesting an extra 4-6 weeks to complete the work to update the site Management System.

As discussed on-site, while the late submission of a request to extend the timescales for submitting an updated Management System was due to the actions of the consultant, where work is contracted to another party it is the responsibility of M D Recycling Ltd. and its directors to ensure that the contractor completes the work by the required deadline. I expect that when the company requires a contractor to undertake work, they are instructed by a date that allows the contractor to complete the work by the required deadline and to keep track of the contracted work to ensure that the deadline is met. Where it appears that the contractor is unlikely to meet the required deadline, I expect the company to contact Natural Resources Wales to highlight this and, when necessary to request an extension to the deadline.

It is also expected that the company keeps records of contracted works and relevant communications as part of the management system, as this demonstrates that the company has taken appropriate measures to comply with the permit and actions set out on compliance reports.

Action: Provide evidence of when the company contracted the consultant to undertake this work **by 23 August 2026**.

Action: Comply with the actions set out in compliance reports **with immediate effect**

W1A - General Management - Cat 3 (Suspended): Permit Condition 1.1.1(a)

The Company have been given this suspended Category 3 breach of the above permit condition because the site management system is inadequate. Compliance report CAR_NRW0051608 required that the company update the site management system to provide information as to how inert waste would be safely stored and treated because, at the time of that compliance visit in April 2026, there was insufficient space to still enable safe operations.

The score for this non-compliance has been suspended as the company's consultant has requested additional time to complete this work. As the reasonably foreseeable environmental risk of the non-compliance is low, this request has been approved. If the company fails to comply with the deadline below, then this score will be re-activated and further action, including potential enforcement action will be considered.

Action: Submit a copy of the updated management system, written in accordance with the Natural Resources Wales guidance document, "How to Comply with your Environmental Permit" **by 30 September 2026**, that includes the following information:

- 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.
- the changes in bioaerosol monitoring

W2D - The Site - Cat 3: Permit Condition 2.2.1

The Company have been given this Category 3 breach of the above permit condition because the inert waste stockpile situated between the composting activity and the adjacent Anaerobic Digestion plant has extended outside the permit boundary, as it now extends across where the track to the aggregate processing area used to be and outside the permit boundary. The layout of the site and site operations mean that the permit boundary is not able to be set out on site, and that the area the waste has extended into is where exempt wastes and end-of-waste materials are stored. The company must ensure that the inert waste stockpile is moved to be within the permit boundary.

This non-compliance indicates that the site does not have sufficient space on-site for the current quantity of wastes being stored.

During this compliance visit, Marc Davies explained that the company would soon be starting to process the inert material and would be able to better manage the stockpiles at the site.

Action: Reduce the size of the inert waste stockpile located between the composting activity and the Anaerobic Digestion plant, so that it no longer extends outside the permit boundary **by 30 September 2026**

Other matters

Dust

Due to the very hot and dry weather conditions this year there is a significant potential for dust to be produced by site activities. During this compliance visit, vehicle movements were creating significant dust clouds, despite the site bowser is being used about four times a day to damp down the tracks. While the very dry conditions continue, the company must ensure that dust suppression procedures are adequate, especially when processing inert waste. If dust is impacting off-site receptors, then dust suppression measures must be improved.

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.