

Compliance Assessment Report CAR_NRW0052680

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: Site Inspection,

Reason: Routine.

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

Parts of permit assessed: Permitted activities; waste storage and handling; permit boundary.

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)	
W2C - Waste - Operations - Operating techniques	C3 Minor	2.3.1
W2C - Waste - Operations - Operating techniques	Action only (X)	
W3G - Waste - Emissions and monitoring - Fire	C3 Minor	3.4.1

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

Total non-compliances recorded	Total non-compliance score
3	12

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	Ensure that actions on compliance reports are addressed at all times	15/08/2026
W1A	Submit copies, or a written explanation, of discussions with hauliers and waste sites to demonstrate the efforts that M D Recycling Ltd have made to remove the shredded wood waste	23/08/2026
W2C	undertake daily monitoring and recording of the internal temperature of the shredded wood waste stockpile at appropriate locations with the stack. If the temperature indicates a risk of self-combustion, the company must take all necessary measures to minimise this risk while complying with the permit	15/08/2026
W2C	Submit a reasonable timescale by when the remaining shredded waste will be removed from the site	23/08/2026
W3G	Submit an updated Fire Prevention and Mitigation Plan that is written using the latest guidance and that addresses the following points: 1) Monitoring and management of the shredded wood waste stockpile 2) Detailed explanation of how wastes are managed at the site 3) Details regarding the minimum separation/fire break distances required 4) Information about potential combustion products and their impacts on sensitive receptors 5) Improve the legibility of site plans 6) Provide building plans that detail access points, fire exits & location of utilities 7) Ensure the isolation points for utilities are included on a site plan. 8) Provide details on a site plan about separation distances in the Transfer building 9) Provide details on a site plan about fire walls - Provide the location of any POPs waste on site plans 10) Provide contact details and actions they must take, for those responsible for sensitive receptors	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 a routine unannounced compliance visit undertaken by Malcolm Dines (Waste Regulation Officer) to assess compliance with actions set out in Compliance Report CAR_NRW0052062, dated 9 June 2026.

Permit Breaches

W1A - General Management - Cat 3; Permit Rule 1.1.1(a)

The company has been given this category 3 breach under rule 1.1.1(a) as it has failed to comply with the actions set out in Compliance Report CAR_NRW0052062. The company was required to remove all shredded wood waste from the site and submit Waste Transfer Notes for these movements and to submit to Natural Resources Wales an updated Fire Prevent and Mitigation Plan.

Neither of these actions were completed and the root cause of this failure is that either the the company is failing to operate in accordance with a suitable Management System, or the Management System for the site is inadequate as it does not include how to address and rectify non-compliances.

Action: ensure that actions on compliance reports are addressed **at all times**

Action: submit copies, or a written explanation, of discussions with hauliers and waste sites to demonstrate the efforts that M D Recycling Ltd have made to remove the shredded wood waste **by 23 August 2026**

W2A - Operating Techniques - Cat 3; Permit Rule 2.3.1

The company has been given this category 3 breach under rule 2.3.1 because shredded wood waste is not being stored in a building or within a secure container. Originally compliance report CAR_NRW0051609, dated 7 May 2026, required the company to remove all the shredded wood waste from site, and for waste sampling and transfer notes to be submitted to Natural Resources Wales by 7 June 2026. The company requested an extension to this deadline due to having been let down by other companies over the removal of this waste.

On 28th July 2026 I received an email from a consultant representing M D Recycling Ltd, stating that all remaining shredded wood waste had been removed from site, but no Waste transfer Notes or sampling reports were submitted.

During this compliance visit it was seen that there is still a significant quantity of shredded wood waste remaining on site meaning that the email sent to me contained information that was incorrect, or intentionally misleading.

Marc Davies explained that the company was still having significant difficulties in finding third parties to transport the waste and so are looking at purchasing a walking floor trailer to enable them to haul their own waste. But also cautioned that due to a small number of sites operating, it is very difficult to find sites that will accept the waste.

During the compliance visit the fire risk posed by the shredded wood waste was discussed. There was no evidence of smoke being produced by the stockpile, but due to the very hot and dry summer this stockpile creates a significant risk of fire and therefore the company must monitor and record the temperature of the stockpile. Natural Resources Wales' Fire Prevention and Mitigation Plan guidance: [Natural Resources Wales / Fire prevention and mitigation plans](#) states that fire detection systems includes the use of temperature probes that the company has for monitoring the composting activity permitted by the Bespoke Permit.

The failure to comply with the following actions may result in Natural Resources Wales taking further action, including enforcement action, to ensure compliance with the permit and protection of the environment.

Action: undertake daily monitoring and recording of the internal temperature of the shredded wood waste stockpile at appropriate locations with the stack. If the temperature indicates a risk of self-combustion, the company must take all necessary measures to minimise this risk while complying with the permit **with immediate effect**

Action: submit a reasonable timescale by when the remaining shredded waste will be removed from the site **by 23 August 2026**

W3G - Fire - Cat 3; Permit Rule 3.4.1

The company has been given this category 3 breach of Rule 3.4.1 as it is not operating in accordance with a Fire Prevention and Mitigation Plan that has been written in accordance with the latest guidance. Compliance Report CAR_NRW0051609 required the company to update the existing Fire Prevention and Mitigation Plan and compliance report CAR_NRW0052062 extended the deadline for compliance until 28 July 2026.

On 28th July 2026 I received an email from a consultant representing M D Recycling Ltd, requesting an extension to complete this work. As the operator, it is the responsibility of the company to ensure that the permit is complied with and, where this work is being undertaken by contractors, that contractors are properly managed as this must form part of the Management System for the site.

When compliance report CAR_NRW0052062 was issued on 9 June 2026, there had already been a significant period of hot, dry weather which has continued through the summer. Therefore the need to update the Fire Prevention and Mitigation Plan should have been considered a priority.

I consider that the three month timescale for completing this work was plenty. The justification for requesting an extension to the deadline to complete this work appears to be because the company's consultant was too busy and therefore the suspended score on compliance report CAR_NRW0052062 will be unsuspended.

Action: Submit an updated Fire Prevention and Mitigation Plan that is written using the

latest guidance **by 30 September 2026** and that addresses the following points:

- Monitoring and management of the shredded wood waste stockpile
- 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.