

Compliance Assessment Report CAR_NRW0052638

Permit being assessed: AB3094ZR.

For: Coomb Farm, **held by:** Sion Davies

At: Coomb Farm, Llangynog, Carmarthen, Carmarthenshire, SA33 5HP.

Type of assessment: Site Inspection,

Reason: Routine.

On: 06/08/2026 between 13:00 and 15:00.

Parts of permit assessed: See Below.

NRW Lead Officer: Michael Edwards.

Report sent to: Sion Davies, Operator, on 20/08/2026.

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
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2C - Waste - Operations - Operating techniques	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W3E - Waste - Emissions and monitoring - Monitoring	C3 Minor	3.1.2
W4A - Waste - Information - Records	Assessed (A)	
W4B - Waste - Information - Reporting	C3 Minor	4.2.2

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	Update EMS to provide clear management systems to the current operations on site.	30/09/2026
W3E	Undertake annual emissions monitoring to the specifications and levels detailed in the environmental permit.	30/09/2026
W4B	Ensure that all waste returns are submitted to NRW as per conditions 4.2.2	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

Arranged site inspection undertaken by Michael Edwards and Alex Underhill of Natural Resources Wales.

Since the previous inspection, operations have changed, with the farming operations no longer under the control of the permit holder.

Discussions were had during the inspection on the duty of care requirements. Please ensure that you read and fully understand the requirements in accepting waste from a producer and your responsibilities in exporting the resultant digestate following the treatment process in the AD plant.

More information on Duty of Care can be found on the following link.

[Natural Resources Wales / Waste duty of care](#)

Discussions were also had on the storage and use of the resultant digestates from site. Since the previous inspection, the former Regulatory Decision has been replaced with the following guidance;

[Natural Resources Wales / End of waste: anaerobic digestate produced from anaerobic digestion of source-segregated biodegradable waste](#)

General Management - W1A - Category 3

During the inspections officers discussed the requirement for the operations to work in line with the written Environmental Management Systems (EMS) that identifies and minimises the risk of hazards to the environment and human health as per **condition 1.1.1 (a)**. Whilst the basic operations of the Anaerobic Digester remain the same as described in the EMS, the change in legal operators of the farm need to be addressed within the EMS and updated.

This has been scored as a **Category 3 breach** of **permit conditions 1.1.1 (a)**.

Action - Update the EMS to reflect the current on site activities and process in accordance with NRW guidance.

Digital copies of both the EMS and the Permit were made available to officers during the inspection as required under **conditions 1.1.2 and 1.1.3**.

Condition 1.1.4 requires that the operators comply with an approved competency scheme. Currently the operator is having difficulty retaining his continuing competencies due to health reasons however, discussions were had on the potential use of an external consultant with the appropriate certificate to temporarily hold the TCM position until such a time that the operator is able to retake the certification.

Action - Ensure that the requirements of **condition 1.1.4** are met either through the use of a suitably qualified external TCM or by ensuring that the continuing competencies are held and provide evidence of this to NRW.

Waste Operations - W2A, W2C, W2D, W2E.

Permitted AD operations on site were managed by an employee, and were in accordance of the permit conditions.

Daily monitoring records were shown to the officers on request all held in the site office. With feedstock of the AD plant under the 100m³ capacity of the permit with recorded ranges between 55-67m³ dependant on the requirement of the digesters processes.

All waste treatment processes were undertaken within the permitted area, and the wastes imported to site were in line with the wastes allowed under **conditions 2.3.1**.

Condition 3.2.3 - All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise leakage and spillage from the primary container.

As was discussed on site during the inspection, the permit operator must remain in full control of the secondary bund that will be used in the case of an emergency to ensure that there is sufficient capacity and that the structural integrity is sound and will not lead to any leaks.

Furthermore, officers also raised the significant vegetation growth in the former lagoon, this may impact the structural integrity of the secondary containment.

Action - As discussed, you must ensure that as the permitted operator you have full control over the secondary containment and bring it into the permitted area on site and must ensure that it remains in good condition to ensure that all possible emissions from site are contained in the event of an emergency.

Monitoring - W3E - Category 2

The annual monitoring on engine emissions under **condition 3.1.2** was requested and officers were provided a report following some maintenance of Engine 1, completed by the engineer used. On review of the report, this cannot be accepted as the Annual Emissions report required under **condition 3.1.2** as the report provided was for the verification of carburation and synchronisation of settings on the engine following maintenance.

This has been scored as a **Category 2** breach of **condition 3.1.2**. As the required monitoring of emissions has not been completed to the standards required set out in the environmental permit.

Action - Ensure ensure that annual monitoring is completed in accordance with the requirements of the permit and that a suitable qualified

Records and Reporting - W4A, W4B - Category 3

Since the previous inspection, operations have changed with the farming operations and resultant slurries and manures now run by a different legal entity despite being on the same parcel of land. As discussed on site, this will now alter the administrative requirements of the site, with the site needing to put in place a process to ensure that all wastes - namely the slurry and manures used as feedstock for the AD plant, are recorded accurately by weight and volume and that the Duty of Care (DOC) requirements for the importation of wastes and for the removal of wastes from site are met.

Whilst daily records of the wastes being used as feedstocks have been recorded in the site diary, you must also ensure that the waste returns are being completed as required under conditions 4.2.2 and returned to NRW as per the condition.

This has been scored as a **Category 3 breach** of **conditions 4.2.2**.

Action - you must resubmit all returns to reflect all wastes that are imported from the farming operations are now included within and the digestate exported from the treatment facility.

Many thanks for your time during the inspection.

End.

Any compliance criteria not highlighted in the above summary should be considered as not assessed. In this document 'Natural Resources Wales' means the Natural Resources Body

for Wales established by Article 3 of the Natural Resource Body for Wales (Establishment) Order 2012. You should note that the Natural Resources Body for Wales has been formed by bringing together the Countryside Council for Wales, Forestry Commission Wales and Environment Agency Wales. The Natural Resources Body for Wales has been empowered to exercise Welsh devolved functions since 1 st April 2013 and has, generally, taken over the responsibilities of the Countryside Council for Wales, the Forestry Commissioners and the Environment Agency for Wales.

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.