

Compliance Assessment Report CAR_NRW0052755

Permit being assessed: GWSE2349

For: Llone Farm, **held by:** Robert Pugh

At: Nantmel Rhayader Powys, LD6 5PE.

Type of assessment carried out: Site Inspection,

Reason: Routine.

On 17/08/2026, between 13:45 and 14:30.

Parts of permit assessed: See Criteria below

NRW Lead Officer: Shaun Rees.

Report sent to: Mr Stephen Pugh & Mr Robert Pugh, Permit holders, on 21/08/2026.

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

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
WQ-A1 - Water Quality - Management - General management	C3 Minor	1.1.1 General management
WQ-B1 - Water Quality - Operations - Permitted activities	Assessed (A)	
WQ-B2 - Water Quality - Operations - The site	Assessed (A)	
WQ-B3 - Water Quality - Operations - Operating techniques	C3 Minor	2.3.8 Volume and Rate
WQ-C3 - Water Quality - Emissions and monitoring - Emissions of substances not controlled by emission limits	Assessed (A)	
WQ-D1 - Water Quality - Information - Records	C3 Minor	4.1.2 Records
WQ-D2 - Water Quality - Information - Reporting	Assessed (A)	
WQ-D3 - Water Quality - Information - Notifications	Assessed (A)	

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-A1	Produce an Environmental Management system and provide evidence to NRW	18/09/2026
WQ-B3	Ensure you comply with the permit condition of 1m3	18/09/2026
WQ-D1	Produce an Environmental Management System and provide evidence to NRW	18/09/2026

Action 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

Natural Resources Wales Officer Shaun Rees met with Mr Stephen Pugh to carry out an inspection in regards to the sites EPR sheep dip permit on the 17 August 2026 at 13:45.

Mr Pugh stated during the inspection that he does not have a static dipping bath, but had invested in a mobile plunge dipping trailer a few year ago, but was not a sheep dipping contractor.

The disposal areas were inspected and no issues seen, along with the lockable chemical store.

Records of disposal had been kept, but no Environmental Management System was in place, which has resulted in a non compliance along with the limits of the permit in reference to dilution Volume and rate.

Non-Compliances (recorded in summary) Actions to be addressed –

1.1.1 General Management

No Environmental Management system currently in place

1.1.1 The operator shall manage and operate the activities:

(a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints.

Please produce an Environmental Management System and provide evidence to NRW by 18 September 2026

2.3.8 Volume and Rate

Records provided shown that the volume of dilution had exceeded the permit limit of 1m³, records stated 2m³.

2.3.8 The maximum daily spreading rate of used/waste working strength sheep dip further diluted in the ratio of 1 part dip to 3 parts slurry or water shall not exceed 1 cubic metres spread evenly on a minimum of 0.05 hectares of land identified in schedule 7.

Please ensure you comply with the permit at all times.

4.1.2 Records

No Environmental Management system currently in place

1.1.1 The operator shall manage and operate the activities:

(a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints.

Please produce an Environmental Management System and provide evidence to NRW by 18 September 2026

[Natural Resources Wales / Develop an Environmental Management System for a permit to discharge used sheep dip to land](#)

Thank you for your time during the inspection

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 to 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
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

Full list of water quality action criteria (used in section 1 and 2):**WQ A: Management**

- WQ-A1 General management

WQ B: Operations

- WQ-B1 Permitted activities
- WQ-B2 The site
- WQ-B3 Operating techniques
- WQ-B4 Improvement programme
- WQ-B5 Pre-operational conditions

WQ C: Emissions and monitoring

- WQ-C1 Emissions to water
- WQ-C2 Emissions to land
- WQ-C3 Emissions of substances not controlled by emission limits
- WQ-C4 Monitoring
- WQ-C5 Installation of monitoring boreholes

WQ D: Information

- WQ-D1 Records
- WQ-D2 Reporting
- WQ-D3 Notifications

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.