Compliance Assessment Report CAR_NRW0052983

Permit being assessed: SP3537VQ.

For: Bryn Pica AD Plant EPR/SP3537VQ, **held by:** Biogen Bryn Pica Ltd

At: Bryn Pica Landfill Site , Aberdare, Rhondda-Cynon-Taff, CF44 0BX.

Type of assessment: Site Inspection,

Reason: Routine.

On: 08/09/2026 between 11:30 and 12:30.

Parts of permit assessed: Various.

NRW Lead Officer: Greg Gardner, accompanied by Mostyn Wall, Brigid Armstead, Lucy Theophilus.

Report sent to: Site Manager, Site Manager, on 21/09/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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
IR3B	Provide NRW with evidence to justify the proposed approach of reporting only gas leaks above a defined threshold. This should include the current LDAR procedure with leak	30/10/2026

Criteria	Action needed	Complete by
	classification criteria, The reporting and escalation thresholds including a environmental significance assessment methodology and, a summary of LDAR survey findings and corrective actions undertaken at the Bryn Pica facility over the previous 12 months. The information should demonstrate how leaks are identified, categorised, recorded, repaired, verified and escalated where appropriate, and how LDAR findings are used to inform Planned Preventative Maintenance (PPM) programmes to minimise fugitive emissions and prevent recurring leaks.	

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.

At this time, we do not intend to take any further action.

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 report details the site visit made on the 8th September 2026 to the Biogen Bryn Pica AD Site, permit reference number EPR-SP3537VQ.

Natural Resources Wales (NRW) Senior Officers Greg GARDNER, Brigid ARMSTEAD, Lucy THEOPHILUS Lead Specialist Mostyn WALL, attended the Biogen Bryn Pica AD Site, Merthyr Road, Llwydcoed, Aberdare, Rhondda Cynon Taff CF44 0BX for a planned routine site inspection at 11:30am where they were met with a member of the Biogen Site Management. The weather was dry, overcast and reasonably mild at the time of the inspection.

GENERAL OBSERVATIONS

Upon arriving at site, NRW personnel were inducted and discussions took place regarding current and planned site operations. It was raised with NRW of a minor gas leak on 01/10/25 on the gas blower likely caused by the low level of grease within the auto-greaser tubes and again on 08/04/26 on the PRV (Pressure Release Valve) on digester tank no.2. An internal improvement log was raised, the PRV was cleaned, checked and resealed, and no further issues were identified.

NRW received notification from Biogen Bryn Pica AD staff on 01/09/26 regarding a marginal PAS110 physical contaminants failure identified from a digestate sample taken on 11/08/26. The operator advised that digestate dispatches were suspended upon receipt of the results, an investigation was completed, corrective actions were implemented and subsequent testing confirmed compliance with the physical contaminant limits. The operator concluded that the likely cause was a sampling discrepancy. Based on the information provided, no

evidence of pollution or permit non-compliance has been identified at this stage. NRW will review the investigation findings and corrective actions as part of ongoing compliance assessment.

The operator provided three follow-up PAS110 sample analysis reports which demonstrated compliance following an initial marginal failure for physical contaminants. In addition, LDAR (Leak Detection and Repair Report) survey reports dated 01/10/2025 and 08/04/2026 were submitted. The surveys identified isolated fugitive methane emissions from the gas blower vents and subsequently a pressure relief valve (PRV) on Digester 2. The operator demonstrated that these emissions were identified through a proactive monitoring programme, recorded through their internal management system, and addressed through corrective actions including inspection, cleaning and resealing of the equipment. The most recent survey confirmed that the previously identified gas blower emission had been rectified and no further leakage was detected. The permit does not prescribe emission limits for PRVs and there is no evidence that the PRV was being used routinely to vent biogas. On the basis of the information provided, the operator has demonstrated appropriate monitoring, investigation and corrective action in accordance with the management system requirements of the permit.

ACTION: Provide NRW with evidence to justify the proposed approach of reporting only gas leaks above a defined threshold.

1. **This should include the current LDAR procedure with leak classification criteria,**
2. **The reporting and escalation thresholds including a environmental significance assessment methodology and,**
3. **A summary of LDAR survey findings and corrective actions undertaken at the Bryn Pica facility over the previous 12 months.**

The information should demonstrate how leaks are identified, categorised, recorded, repaired, verified and escalated where appropriate, and how LDAR findings are used to inform Planned Preventative Maintenance (PPM) programmes to minimise fugitive emissions and prevent recurring leaks.

DUE DATE: 30/10/26

During the site walkaround inspection, the overall housekeeping standards across the site were observed to be well-maintained. Work areas were free from unnecessary clutter, waste materials were appropriately stored or disposed of, and walkways remained unobstructed, contributing to a safe and orderly environment. This level of cleanliness supports both operational efficiency and risk mitigation (see photo 1).



Photo 1 - Good housekeeping standards on site

All required safety signage and physical barriers were clearly visible, correctly positioned, and in good condition. These included hazard warnings, directional signs, and restricted access indicators, which were compliant with relevant health and safety regulations. Their presence and clarity ensured that site personnel and visitors were adequately informed of potential risks and safe practices.

Areas containing liquids were appropriately labelled, segregated, and provided with suitable secondary containment measures, including double-skinned containers and spill pallets. No evidence of loss of containment was observed during the inspection.

NRW Officer WALL utilised an optical gas imaging camera to assess areas of the site that are more vulnerable to fugitive emissions, including pipework and associated infrastructure. During the inspection, Officer WALL reported that the survey identified no fugitive emissions originating from the site.

CLIMATE CHANGE RISK ASSESSMENT (CCRA)
Biogen Bryn Pica AD submitted a CCRA to NRW on 26/09/25. This was reviewed by NRW Officer Greg GARDNER and subsequent CAR form issued to Biogen Bryn Pica AD on 17/08/26 (CAR_NRW0052468) with actions to be completed and submitted to NRW by 25/09/26.

Following this resubmission and review, the next step is to develop a Climate Change Adaptation Plan (CCAP) based on the findings within the sites CCRA and integrate into the management system. The detail in the CCAP should reflect the risk that climate change creates for the operation. Following the Regulation 61 Notice issued to Biogen Bryn Pica, this CCAP will need to be completed and submitted to NRW by **01/04/27**.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012

END.

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.