Compliance Assessment Report CAR_NRW0053144

Permit being assessed: AN0296701

For: THE GRIFFIN INN FELINFACH BRECON, **held by:** EATDRINKSLEEP LIMITED

At: THE GRIFFIN INN, FELINFACH, BRECON, LD3 0UB.

Type of assessment carried out: Site Inspection,

Reason: Routine.

On 30/09/2026, between 14:30 and 15:10.

Parts of permit assessed: 1. Management, 2. Operations, 3. Emissions and Monitoring, 4. Notifications

NRW Lead Officer: Frankie Farrell, accompanied by: Kirsty Allwood.

Report sent to: Cally Charles, Operations Manager, on 05/10/2026.

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 (a) 1.1.3
WQ-B2 - Water Quality - Operations - The site	C3 Minor	2.2.1
WQ-C4 - Water Quality - Emissions and monitoring - Monitoring	C3 Minor	3.3.1
WQ-D3 - Water Quality - Information - Notifications	C3 Minor	4.3.1 4.3.2
WQ-B1 - Water Quality - Operations - Permitted activities	Action only (X)	

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	A written management system compliant with Condition 1.1.1(a) must be submitted to NRW for the new treatment plant.	31/12/2026
WQ-B2	Submit a permit variation application to NRW to accurately reflect the site's layout, infrastructure, and discharge point, ensuring the variation reflects the installation of the replacement treatment plant and any associated changes to infrastructure, discharge arrangements, and monitoring	31/12/2026

Criteria	Action needed	Complete by
	points.	
WQ-C4	As part of the permit variation application, identify the correct sampling point and ensure all final effluent passes through a representative and accessible monitoring location prior to discharge.	31/12/2026
WQ-D3	Implement procedures to ensure NRW is notified without delay of equipment failures, permit breaches, pollution incidents and other events requiring notification under Conditions 4.3.1 and 4.3.2 of the permit.	31/10/2026
WQ-B1	Submit a written plan detailing mitigation measures to prevent pollution of the River Dulas from the existing treatment plant.	31/10/2026

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

Site Description

The Felin Fach Griffin Inn is in Brecon, Powys. The site is permitted to discharge a maximum of 10m/^{3}day of secondary treated sewage effluent to the River Dulas from the discharge point specified within the permit.

Purpose of Visit

This was a routine unannounced compliance inspection. Officers were accompanied by a member of staff from the Inn throughout the visit.

Weather Conditions

Sporadic periods of heavy rainfall had occurred within the 24 hours preceding the inspection.

General Management

Upon arrival at the site, officers noted a strong sewage odour around the side of the Inn. The odour was strongest in the vicinity of the sewage treatment plant (STP). Access covers

associated with the treatment plant appeared to be in poor condition.

The member of staff accompanying officers was unable to provide evidence of a written management system as required by the permit under Condition 1.1.1(a), which states that the operator shall manage and operate the activities:

"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; and using sufficient competent persons and resources."

Condition 1.1.3 further requires that relevant staff have access to the written management system.

The absence of a written management system for operating the activities, together with staff not having access to it, may increase the risk of pollution incidents occurring, not being identified, and not being appropriately managed. **A category 3 non-compliance** has therefore been assigned for this breach.

Required Action

- A written management system compliant with Condition 1.1.1(a) must be submitted to NRW for the new treatment plant by **31 December 2026**.

Operations

The member of staff confirmed that the existing sewage treatment plant was not operating correctly. They advised that a replacement treatment plant is currently being constructed and is expected to be installed by the end of October 2026.

The staff member stated that delays in installation had arisen due to difficulties obtaining insurance approval. NRW notes that the same reason for delay was provided during correspondence in February 2025, indicating that the issue has remained unresolved for a significant period.

The staff member believed the system was being emptied by tanker approximately every six weeks, at the same time as the site's fat traps were serviced. However, they were unable to confirm whether this involved removal of sludge only or removal of effluent from the system.

Discharge Point

The location identified by site staff as the discharge point does not appear to correspond with the point specified within the permit, (Schedule 3 Table S3.2 specifies the permitted discharge point as NGR SO 09086 33098).

Dense vegetation along the riverbank further prevented secure identification of the discharge pipe and confirmation of the exact discharge location.

Condition 2.2.1 states:

"The activities shall not extend beyond the site, being the land shown edged in green on

the site plan, and the discharge(s) shall be made at the point(s) marked on the site plan at Schedule 7 to this permit and listed in Table S3.2 (discharge points)."

An action to submit a permit variation to update the site plan to include the correct discharge point was requested in NRW's 2024 inspection report but has not been submitted therefore a **category 3 non-compliance** has been given for this breach due to the continued uncertainty regarding the point at which the discharge enters the receiving watercourse and the potential for further pollution to go unseen.

Required Actions

- Submit a written plan detailing mitigation measures to prevent pollution of the River Dulas from the existing treatment plant. **Due by 31 October 2026.**
- Submit a permit variation application to NRW to accurately reflect the site's layout, infrastructure, and discharge point, ensuring the variation reflects the installation of the replacement treatment plant and any associated changes to infrastructure, discharge arrangements, and monitoring points. **Due by 31 December 2026.**

Emissions and Monitoring

Sampling Point

The accompanying staff member was unable to identify the location of the permit sampling point.

The permit requires sampling to be undertaken at the authorised discharge point. Officers were unable to identify or access a representative sampling location during the inspection.

This is a breach of **Condition 3.3.1**, which states:

"Permanent means of access shall be provided to enable sampling and monitoring to be carried out in relation to the emission points specified in Schedule 3 Tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by Natural Resources Wales."

A category 3 non-compliance has been assigned to this breach. The reasonably foreseeable consequence of this breach is that effluent quality cannot be accurately monitored, and permit breaches may not be detected, increasing the risk of pollution occurring without being identified. In addition, any samples taken from an incorrect location may not accurately represent the quality of the final effluent entering the receiving watercourse.

Required Action

- As part of the permit variation application, identify the correct sampling point and ensure all final effluent passes through a representative and accessible monitoring location prior to discharge. **Due by 31 December 2026**.

Notifications

Although the member of staff confirmed that the treatment plant was not functioning

correctly, NRW has not received notification from the permit holder regarding this failure.

This is a breach of **Condition 4.3.1**, which states:

"Natural Resources Wales shall be notified without delay following the detection of:

(a) Any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution.

(b) The breach of a limit specified in the permit; or

(c) Any significant adverse environmental effects."

Condition 4.3.2 further requires notification to be formally confirmed using the information specified in Schedule 5 of the permit.

A category 3 non-compliance has been assigned to this breach due to the potential for significant pollution and the missed opportunity for early intervention. Failure to notify NRW of the treatment plant malfunction prevented timely regulatory assessment of the incident and implementation of appropriate mitigation measures. The delay in notification increased the risk that any ongoing environmental impact could continue unchecked and without regulatory oversight.

Required Action

- Implement procedures to ensure NRW is notified without delay of equipment failures, permit breaches, pollution incidents and other events requiring notification under Conditions 4.3.1 and 4.3.2 of the permit.

Overall Conclusion

The inspection identified several significant compliance failures associated with management systems, operation of the sewage treatment plant, discharge point accuracy, monitoring infrastructure, and statutory notification requirements.

The absence of a written management system, uncertainty regarding the location of the discharge and sampling points, and failure to notify NRW of the treatment plant malfunction have collectively reduced the permit holder’s ability to effectively control, monitor, and mitigate pollution risks.

Covers to treatment plant



Sewage fungus in watercourse



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.