Compliance Assessment Report CAR_NRW0053140

Permit being assessed: AP3033HY.

For: Mona Anaerobic Digestion Plant , **held by:** Anglesey Energy Limited

At: Mona Industrial Estate, Gwalchmai, Anglesey, LL65 4RJ.

Type of assessment: Site Inspection,

Reason: Routine.

On: 01/10/2026 between 10:00 and 12:15.

Parts of permit assessed: 1.1 General Management, 2. Operations, 3 Emissions and Monitoring, 4 1.2 Energy Efficiency, .

NRW Lead Officer: Anthony Roberts.

Report sent to: Ed Bastow, Managing Director, on 02/10/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR1C - Installations - Management - Energy Efficiency	Assessed (A)	
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2D - Installations - Operations - Technical requirements	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	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?

No action required.

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

ANGLESEY ENERGY (AE)UPDATE SITE MEETING AND INSPECTION

RAF Valley - Bird Control Measures, Permeate Usage, Engine and Flare Performance and Sustainability Developments.

01/10/2026

Present: Ed Bastow, Keith Torr (Anglesey Energy (AE))

Tony Roberts (NRW)

A meeting and site inspection was convened to discuss the above issues and other operational matters, focussing on bird control measures at the peak time for harvest, clamp filling and the return of starlings en masse. Please note all required actions are in italics/bold listed below.

1. **Birds/Pests/RAF Valley**
   The coordination bird control meeting with RAF Valley went very well and there have been no further issues. They have an open channel to Anglesey Energy direct and will inform AE of any developments or issues relating to bird control at the site.
   ACTION: **Ensure NRW and RAF Valley are kept informed of any change to the current situation with regard to the number of birds feeding at the site.**
   Harvest has been completed early as a bird control measure. The main historical cause of issues has been large flocks of starlings feeding on the main concrete apron and in the clamps. Large numbers of birds begin to reappear in mid-October, so early harvest and storage avoids the issues with loading the clamps when netting systems controls are limited by operational necessity.

2. **New Clamp Enclosure Netting System.**

   Site operatives have previously used a handrail on top of the clamps to hold netting, a new

'tuning fork system' has been designed, where legs either side of the clamp wall are holding the net higher with more tension which provides more security against bird entry and is easier to manage. Additionally cross wires are to be added to hold the net further up and maintain tension. This is a critical adaptation for improved pest control. Large capex spend for a novel system, fabricated locally.

ACTION: **Update NRW when construction of the new netted system is complete so a follow up inspection can take place.**
ACTION: **Arrange a joint site meeting with NRW and RAF Valley when the new netting system is complete.**

3. **Contractor Cleaning Programme and EMS**

The new cleaning arrangement with the agricultural contactor is going very well. Apron cleaning takes place during and after clamp and digester loading. This protocol is to be emphasised and delivered to contractors on a monthly basis as a reminder of the required standards. There is a sign off sheet on the EMS and AE will do another toolbox talk on the clean down and inspection protocol. This has been added to the EMS.

ACTION: **AE to initiate monthly 'toolbox talks' regarding EMS duties for clean down protocol following all activities involving digester feedstock. This is to be recorded in the site diary.**

4. **Caws Mon Permeate /Energy Provision**

As production has steadied at Caws Mon Cheese facility, the supply of whey/permeate has settled into a predictable routine. 70 to 80 tonnes of whey per month is delivered on average. The protein separation process has not yet started which will remove some of the milk protein but still leave a high energy permeate fraction for use in the AD process. This will happen within months. This is advantageous as AE will need to have less land available for whole crop as feedstock, which is more sustainable and produces improved gas yield. The site can handle up to about 70 tonnes of whey/permeate per day which is the limit for AE now.
If greater quantities of whey/permeate become available then the site will need to be adapted to the extent that additional planning will be required along with an EPR permit variation. More gas would be generated involving the potential for a unique circular gas provision to local businesses, feeding into a circular sustainable model. Along with a gas to grid option liquefied CO2 could be produced as a byproduct. Approximate timeline for this work to be complete is 2030.

5. **Digester Performance**

The digester is producing high quality gas to enable the Edina engine to run at full capacity. However the engine has been operating below full capacity due to service and maintenance issues creating more downtime than is necessary. Output is mid – high 80s in percentage

terms on average throughout the year. AE, is reviewing downtime with a view to further improvements. Year on year output has improved and increased. On 125 t/d of whey, they could reduce all maize and produce 3/4mw operation. Low pressure gas grid is available locally. FITs on increased gas production up to 4MW so gas to grid would need to be the next option. This is a unique sustainability model which meets NRW regulatory and Welsh Government aims and objectives.

6. **Flare Operation**
   The flare is oversized and has a high turndown ratio and runs for less than 10% of the time. ***ACTION:*** **AE to provide exact flare usage figures and details of time in use and flare temperature profile as there is evidence of downwash and carbon deposits on the top of the outer flare housing.** There is also evidence of high temperature oxidation of the metal on the outside, penetrating the refractory lining. This may be due to high operating temperatures. The ideal range for almost complete combustion is 950degC – 1050degC. ACTION: AE to confirm the flare turndown ratio.

7. **General Management Issues**
   Some mains water was used in the process during the drought plus water from the drainage pond but the whey input allows for less use of water. There has been no discharge from the pond for several years. No GW issues from the clamps. The discharge pipe is partially covered with leaf litter and other wood debris as is the dry stream bed.

   ACTION: AE to clean out ditch and re-expose the full discharge pipe diameter within 4 weeks of the date of this CAR form.

8. **AOB**
   H&S plus DSEAR zoning file now in place for all visitors to site. This has been supplied to NRW. Visitor induction guide now in place for all visitors.

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.