

This form will report compliance with your permit as determined by an NRW officer

Site	Intertissue Neath	Permit Ref	BU2489IT		
Operator/Permit holder	Intertissue Ltd				
Regime	Installations				
Date of assessment	05/05/2017	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	Annual and Six Monthly Monitoring Reports				
Lead officer's name	Dunn, Karen				
Accompanied by					
Recipient's name/position	Kerry MacKinnon / Environment Manager	Date issued	05/05/2017		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
A1 - Specified by permit	A	
E1 - Emissions - Air	A	
E3 - Emissions - Surface water	A	
E5 - Emissions - Waste	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	
H1 - Resource Efficiency - Efficient use of raw materials	A	
H2 - Resource Efficiency - Energy efficiency	A	
	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.
A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,
O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Introduction

This Compliance Assessment Report (CAR) form includes a review of the annual performance submission from Intertissue Ltd for 2016. This annual reporting is required by the environmental permit for the installation. The CAR also includes a review of the six monthly monitoring report submissions for emissions to air and water that were made by the operator in the first annual quarter of 2017 (Q4 financial year).

Environmental Permit Condition – 4.2 Reporting

Annual Performance Review

On the 27 January 2017 the operator submitted their 2016 annual performance report on time and by the 31 January 2017 deadline. The submission is required by condition 4.2.2 of the environmental permit and replicated below for ease of reference:

4.2.2 A report of reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales by 31 January (or other date agreed in writing by Natural Resources Wales) each year. The report(s) shall include as a minimum:

(a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of the data;

(b) the annual production/treatment data set out in Schedule 4 table S4.4; and (biomass plant)

(c) the performance parameters set out in Schedule 4 table S4.2 using the forms specified in table S4.3 of that schedule.

(d) This condition relates to the biomass plant which is yet to be constructed.

NB/ NRW acknowledges that there are some reporting requirements in the environmental permit associated with the proposed biomass plant. The operator has provided an update to NRW concerning the biomass project which is currently on hold until mid-2018.

At the end of March 2016 the operator was issued with a revised permit to incorporate the changes brought about by the revised Best Available Techniques (BAT) reference document (BREF - Production of Pulp, Paper and Board published on 30 September 2014). In short it is acknowledged that the parameters reported for 2016 have not been compared to previous years by the operator as the production definition has changed in the revised BREF. In this instance for tissue mills, net production refers to saleable tonnes off the tissue machine before any rewinding

processes and excluding any cores.

NRW recognises that Intertissue Ltd as part of the Sofidel Group has tight annual targets placed on the mill by the parent company. Energy and water usage for example have set yearly targets so consumption is closely monitored in order to meet them as part of the Sofidel Group. There is a commitment by Intertissue Ltd to reduce water and energy usage not from just a cost saving perspective but also a contribution to environmental and climate change protection. This is clearly reflected in the figures and projects reported in the annual performance review which is commendable.

The Intertissue Ltd paper mill has a rainwater harvesting system and this is an excellent example of the company's contribution to the sustainable management of our natural resources. NRW is still a fairly new organisation whose purpose is to ensure that the environment and natural resources of Wales are sustainably maintained, enhanced and used now and in the future. The percentage of water used in the process from the capture of rainwater from the roofs of the mill was reported in the annual report and is a contributing factor to a sustainable Wales.

The NRW approach to Sustainability is driven by the following:

Well Being of Future Generations (Wales) Act 2015 and the



Environment (Wales) Act 2016

This act became law in Wales on 21 March 2016.

Purpose: The act puts in place the legislation needed to plan and manage Wales' natural resources in a more proactive, sustainable and joined-up way.

Benefits Include: Clarity on legislation i.e. land drainage consents, marine licensing etc. Ability to better manage our resources etc.

The Well-being of Future Generations (Wales) Act is about improving the social, economic, environmental and cultural well-being of Wales.

Water Framework Directive

For more information on water body status related to the Water framework Directive and their classification around Wales can be found using the following link:

<http://waterwatchwales.naturalresourceswales.gov.uk/en/>

As a result of the permit variation following the publication of the revised BREF the operator was also tasked with an improvement condition (IC1) relating to changes brought about by the Water framework Directive priority hazardous substances. This was responded to on a separate car form

and the subsequent outcome outlined in the annual performance review. By following the link to 'Water Watch Wales' above the status of the water body which the paper mill discharges into can be viewed. This has been shared with the operator for information purposes only.

Emissions to air

Section 3.3 entitled 'Monitoring' in the environmental permit requires the operator to undertake monitoring as specified in Table S3.1 'Point Source Emissions to Air' (January to July 2017). The requirement to report this monitoring is outlined in permit condition 4.2.1. The report has been reviewed and found to have been made on time and in compliance with the environmental permit.

Emissions to Water (W1)

Section 3.3 entitled 'Monitoring' in the environmental permit requires the operator to undertake environmental monitoring as specified in S3.2 'Point Source Emissions to Water'. Again the requirement to report this monitoring is outlined by permit condition 4.2.1.

Regarding the effluent discharged it is noted that the paper mill was on a shut down during this reporting period (August to January 2017) so there was an increase in the volume. The review of the six monthly monitoring report was reported on time and in compliance with the environmental permit.

Conclusion

The review of the submissions made by the operator in the first annual quarter of 2017 were found to be made on time and in accordance with the relevant terms and conditions of the environmental permit. In June 2016 the permit was substantially varied to include a biomass plant this was subsequent to the changes made after the publication of the revised BREF. There are requirements in the permit associated with the biomass plant and NRW has been kept up to date by the operator on the status of this facility. NRW currently understands that the project is on hold until mid-2018. In the submission review period the operator was successful in achieving ISO 50001 certification which is a global recognition in energy management. The standard provides a framework of requirements for organisations to develop a policy for more efficient use of targets and objectives; use data to better understand and make decisions about energy use; and measure the results and improving how the policy works. In achieving this certification it recognises the efforts made by the company to reduce energy where possible through efficiencies and in turn cost savings and also demonstrates a commitment to the environment and climate change protection through the reduction of emissions.

[End]

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0031142**

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Operator/Permit holder	Intertissue Ltd	Date	05/05/2017

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.