

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	22/02/2018	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	See CAR				
Lead officer's name	Dunn, Karen				
Accompanied by					
Recipient's name/position	Kerry MacKinnon/ Environment Manager	Date issued	23/02/2018		

## 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	
H2 - Resource Efficiency - Energy efficiency	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.

<b>Number of breaches recorded</b>	<b>0</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>0</b>
------------------------------------	----------	---	----------

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 2017. 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, water, the annual priority hazardous substance screen, performance 1 form and acknowledgment of the resource efficiency form which were submitted by the operator in 2017 and the first quarter of 2018. This report also includes confirmation of the completion of an improvement condition (IC) placed on the operator as part of the environmental permit review

### Environmental Permit Condition – 4.2 Reporting

#### Annual Performance Review

On the 26 January 2018, the operator submitted their 2017 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 provided an update to NRW concerning the biomass project which was on hold until this year, a further update on this will be sought at the next routine visit.

The commitment by Intertissue Ltd to reduce waste, water and energy usage not from just a cost saving perspective but also a contribution to environmental protection is evident. Projects that have been met in 2017 and those planned for 2018 clearly demonstrates this. Some of the projects that have taken place over the last year include the installation of an electric car charging point for employees, LED lighting which will continue throughout the mill in 2018, and the automated delivery of glue on the installation lines. It is also commendable that the mill achieved

ISO 50001 last year. NRW recognises that Intertissue Ltd is part of the Sofidel Group which place environmental targets on the mill and these are reflected in the objectives and targets detailed in the environment management system

### Performance 1 and Priority Hazardous Substances

The operator reported on the performance indicators for the period of 1 January 2017 to 31 December 2017 (net annual production figures used calculation based on the definition in the BREF) and submitted sample results on the annual priority hazardous substance screen in 2017 in line with the environmental permit. All the results were below level of detection (LOD).

### Resource Efficiency (Performance 2)

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). As part of this permit review the operator had associated improvement conditions which were also added because of changes brought about by the Industrial Emissions Directive (IED). All the he deadlines for the submissions were met by the operator.

For consistency between NRW and the Environment Agency a resource efficiency (RE) reporting form was included in the operator's permit during the permit review. There is no requirement to fulfil all the detail on the form particularly where it is not applicable as it was included for all mills, the operator has provided the information where available and in line with this aspect of reporting.

### Improvement Condition IC2

In 2017 the operator submitted a report to discharge condition IC2. The report was made on time and reviewed against the requirements of the Article 22(2) of the Industrial Emissions Directive (IED) (2010/75/EU). It was clear from the review that the operator had considered the 'European Commission Guidance concerning baseline reports under Article 22(2)' and the relevant stages outlined in producing a baseline report. NRW considers that the improvement condition submissions IC2 is read in conjunction with the original baseline report submitted as part of the permit application for the paper mill. The paper mill was constructed on what was mainly a 'brownfield site' and there was extensive soil and groundwater testing and subsequent analysis undertaken at that time. This IC2 submission therefore supplements that report and has outlined the 'relevant hazardous substances' and considered the possibility of soil and groundwater contamination at the site of the installation in line with the requirements of the IED. NRW can confirm on this CAR form that the operator has discharged the requirements of IC2.

### 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' The requirement to report this monitoring is outlined in permit condition 4.2.1. The report 'six monthly period July to December 2017' has been reviewed and found to have been made on time and in compliance with the environmental permit. Furthermore, the six-monthly air emissions monitoring period January to July 2018 has also been reviewed and the result reported found to be well within compliance. This report was also made on time and on the correct reporting form.

## 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. This six-monthly report in 2017 was also made on time and on the correct reporting form and all the results were found to be compliant with the emissions limit values (ELV's).

## Conclusion

The review of the submissions made by the operator in the latter half of 2017 and the first quarter of 2018 were all found to be made on time and in accordance with the relevant requirements of the environmental permit. In June 2016, the permit was substantially varied to include a biomass plant and there are conditions in the permit associated with this project. NRW has been kept up to date by the operator on the status of the plant so it is not expected to be reported on until such time that it comes on -line. This CAR also includes confirmation that the operator has completed all the improvement conditions incorporated with the permit review following the publication of the revised BREF.

[End]

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0032934**

**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	Date	22/02/2018

### 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](mailto: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.