

Compliance Assessment Report CAR_NRW0046140

Permit being assessed: BU2489IT.

For: Baglan Paper Mill, **held by:** Sofidel UK Limited

At: Brunel Way , Baglan Energy Park, Neath, Neath Port Talbot, SA11 2FP.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: Annual 2024 Monitoring Returns.

NRW Lead Officer: Daren Pike.

Report sent to: Kerry Mackinnon, Environment Manager, on 04/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR4B - Installations - Information - Reporting	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

Introduction

This Compliance Assessment Report (CAR) has been issued in response to the submission of the 2024 annual monitoring returns by Sofidel UK Ltd (the operator) for activities at Brunel Way, Baglan Energy Park, Briton Ferry SA11 2HZ under permit EPR-BU2489IT.

Annual Reporting Requirements as required by condition 4.2.2

The Annual Report was submitted on 31 January 2025 in compliance with the permit requirements.

Point Source Emission to Air Parameters (Air 1 Form) as required by condition 4.2.2

The annual submission included results for all parameters required over this period and are in compliance with the limits set out in the permit.

Point Source Emission to Water Parameters (Water 1 Form) as required by condition 4.2.3

The annual submission included results for all parameters required over this period and are in compliance with the limits set out in the permit.

This CAR was undertaken on 4 February 2025. However, to ensure that the CCS score is attributed to the correct financial year (for billing) the date on CARS has been altered to 31 December 2024.

The Annual Report received from Sofidel Ltd reported the following:



PERFORMANCE REVIEW FOR SOFIDEL UK BAGLAN 2024

As required by permit condition 4.2.2, a report must be submitted on the performance in 2024. This will consider energy, water, waste and performance parameters.

ENERGY AND WATER

Sofidel UK Baglan is committed to reducing the amount of energy used on site from both an environmental and financial perspective. Targets are set yearly by the parent company. The consumption is closely monitored to ensure that these targets are met. To calculate the energy used per tonne of paper produced, the production used is based on the BREF definition – 'saleable production after the tissue machine before any rewinding processes and excluding any core'.

Electricity

Year	kwh/tonne
2023	789
2024	753

The electricity consumed per tonne of paper produced decreased by 4.56% compared to 2023 figures.

Gas

Year	Sm ³ /tonne
2023	150
2024	145

The gas consumption decreased by 3.33%. The decrease in gas consumption continues to come from the installation of the Vico/Nip Redry system on the paper machine.

Raw water used

Year	m ³ /tonne
2023	4.49
2024	4.39

The overall water consumption decreased by 2.2% in 2024.

Effluent water discharged

Year	m ³ /tonne
2023	2.09
2024	2.12

The effluent discharged increased by 1.43%. The discharge is below the yearly average of 3.5-20 m³/t currently described in the BREF document.

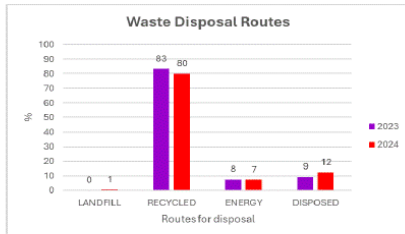


PERMIT BREACHES

One Schedule 5 notification was made to NRW in 2024 regarding an undelivered BOD sample on 15/10/2024. The Schedule 5 was submitted 07/11/2024 after receiving no results for the sample which was originally sent. The lab confirmed that they did not receive it.

WASTE

Sofidel UK Baglan is committed to reducing the amount of waste that goes to landfill and monitors the waste on site closely. Below is a comparison of waste figures for Sofidel Baglan for 2023-2024.



The waste removed from site has been split down into four disposal routes- landfill, recycled, waste to energy and disposed. The landfill waste is composed of hazardous waste which has been removed from site and cannot be recycled. This accounted for 1% of total waste generation in 2024.

The recycled waste consists of cardboard, poly, wood, metal, empty IBCs, sludge, and hazardous waste which can be recycled. The waste to energy is a portion of general waste which was sent to energy recovery facility, and ink washings. The disposed waste is the ink and glue washings which are processed at a water treatment site and then discharged to surface water.

Overall, the amount of waste produced on site has increased by 5.8% compared with 2023.

There was an increase in the amount of hazardous waste disposed of in 2024 compared to 2023. This went from 20.87T (2023) to 59.57T (2024). This mainly due to the interceptors being cleaned in the early part of 2024.

There was a 38% decrease in the number of large parent reel cores sent to scrap. This is due to increased numbers of cores being repaired and a switch to plastic cores which produce less waste. This trend is expected to continue in 2025.



PERFORMANCE PARAMETERS EMISSIONS

The average values for these parameters can be seen below along with the average range listed in the BAT.

PARAMETER	SOFIDEL UK BAGLAN AVERAGE VALUES 2023	SOFIDEL UK BAGLAN AVERAGE VALUES 2024	BAT YEARLY LIMIT kg/T
COD	0.4052 Kg/t	0.5000 Kg/t	1.5 Kg/t
Suspended Solids	0.0515 Kg/t	0.0760 Kg/t	0.35 Kg/t
Total Nitrogen	0.0170 Kg/t	0.0174 Kg/t	0.15 Kg/t
Total Phosphorous	0.0056 Kg/t	0.0058 Kg/t	0.012 Kg/t
Adsorbable organically bound halides (AOX)	0.0004 Kg/t	0.0001 Kg/t	0.05 Kg/t
BOD	0.0189 Kg/t	0.0193 Kg/t	N/A
CO ₂	0.2938 t/t	0.2869 t/t	N/A
NO _x	0.0003 t/t	0.0003 t/t	N/A

The values for 2024 are all within the recommended yearly averages for the listed parameters and are compliant with the recommended BAT-AELs. The data has been calculated using the BREF definition for production.

PRIORITY HAZARDOUS SUBSTANCE SCREEN

The annual monitoring was undertaken for Priority Hazardous Substances. All test methods were performed by accredited laboratories. Samples taken on 05/12/2024 and 17/12/2024.

Emission Point	Substance / Parameter	Emission Limit Value	Result
W1	Tributyl Tin	No limit set	<-0.2 ug/l
W1	Anthracene	No limit set	<-0.1 ug/l
W1	alpha-Endosulphan	No limit set	<-0.007 ug/l
W1	beta-Endosulphan	No limit set	<-0.008 ug/l
W1	Brominated diphenyl ether	No limit set	<-0.005 ug/l
W1	C10-C13 Chloroalkanes	No limit set	<-0.4 ug/l
W1	Hexachlorobenzene	No limit set	<-0.005 ug/l
W1	Hexachlorocyclopentadiene	No limit set	<-0.007 ug/l
W1	Hexachloro-cyclohexane	No limit set	<-0.006 ug/l
W1	Nonylphenol	No limit set	<-0.365 ug/l
W1	Pentachlorobenzene	No limit set	<-0.0005 ug/l
W1	Polycyclic aromatic hydrocarbons (PAHs)	No limit set	<-0.1 ug/l



There was also a 53% decrease in the amount of sludge produced. This was due to repairs to the sludge screener completed at the beginning of 2024.

The Sofidel group has committed to zero waste to landfill by 2027. As part of this commitment, Sofidel UK Baglan will continue to reduce the amount of waste sent to landfill as well as the amount of waste generated on site. We apply the waste hierarchy to all waste streams on site and in 2025 will focus on maintaining recycling and reducing total waste production on site.

ISO 14001 AUDITS

Two ISO 14001 surveillance audits were completed in 2024. There were no non-conformities raised.

ISO 50001 AUDITS

There were no non-conformities raised during the ISO 50001 audit that took place in 2024.

PROJECTS

In 2024, several large projects were completed as well as some which will continue into 2025.

- ISO 14001 recertification – COMPLETED
- Installation of a biomass boiler – ONGOING PROJECT
- Improvements to the rainwater harvesting system – COMPLETED
- HSE management system – COMPLETED

Planned projects for 2025 include those still ongoing from 2024 plus additional projects which include:

- Installation of new LED lighting for papermill
- Ongoing biomass boiler project
- Hydrogen use

CONCLUSION

In 2024 Sofidel UK Baglan was able to achieve all targets relating to energy and water set by the Corporate Department at the beginning of the year. New targets are due to be assigned for 2025. Sofidel UK Baglan has continued to perform energy efficiently and remain focused to achieve 2025 energy and water consumption targets. Unfortunately, Sofidel UK Baglan was unable to continue to divert all hazardous waste from landfill in 2024. The monitoring data completed in 2024 shows that all Sofidel Baglan emissions were well within the levels set in the BREF document.

Permit Number: EPR/BU2489IT Operator: Sofidel UK Limited
 Facility: Baglan Paper Mill Form Number: Air 1 30/09/18

Reporting of emissions to air for the period from 01/07/2024 to 31/12/2024

Emission Point	Substance / Parameter	Emission Limit Value ^[1]	Reference Period	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Uncertainty ^[4]
A2	Particulates	10 mg/m ³	Spot Sample	0.55	BS EN 13284-1 & MID	22/11/2024 10:15-11:01	0.1
A3	Particulates	10 mg/m ³	Spot Sample	0.7	BS EN 13284-1 & MID	22/11/2024 13:58-14:38	0.1

- [1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum - maximum' measured values.
- [2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with Natural Resources Wales is used, then the appropriate identifier is given. In other cases the principal technique is stated, for example gas chromatography.
- [3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.
- [4] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.

K. Mackin
 Signed Date: 27th January 2025
 (Authorised to sign as representative of Operator)

Permit Number: EPR/BU2489IT Operator: Sofidel UK Limited
 Facility: Baglan Paper Mill Form Number: Water 1 30/09/2018

Reporting of emissions to water (other than to sewer) and land for the period from01/01/2024..... to ...31/12/2024.....

Emission Point	Substance / Parameter	Emission Limit Value ^[1]	Reference Period	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Uncertainty ^[4]
W1	Biological Oxygen Demand (BOD)	25 mg/l	24-hour flow proportional composite sample	25mg/l	GLPMETH030-005 by titrimetry	28/11/2024	
W1	Chemical Oxygen Demand (COD) ^[7]	1.5 kg/T	Annually	0.5 kg/T	GLPMETH030-008 by digestion with acidic potassium dichromate and colorimetry		
W1	Total Suspended Solids	0.35 kg/T	Annually	0.076 kg/T	GLPMETH030-003 by gravimetry		
W1	Total Mercury and its compounds	--	24-hour flow proportional composite sample	<0.0002 µg/l	Method ALS WAS013 CVAFS	14/03/2024 27/06/2024 26/09/2024 17/12/2024	
W1	Total Cadmium and its compounds	--	24-hour flow proportional composite sample	<0.0002 µg/l	Method ALS WAS 076 ICP-MS	14/03/2024 27/06/2024 26/09/2024 17/12/2024	
W1	pH	9	Instantaneous	8.22	Standard Sensor	07/01/2024	
W1	pH	6	Instantaneous	6.19	Standard Sensor	30/08/2024	
W1	Priority Hazardous Substances Screen ^[8]	--	24-hour flow proportional composite sample	Please see report Priority Hazardous Substances Submission	GCMS analysis at UKAS accredited laboratory	05/12/2024 07:30 17/12/2024 07:30	

W1	As	--	24-hour flow proportional composite sample	0.33 µg/l	Method ALS WAS 076 ICP-MS	14/03/2024	
W1	Cu	--	24-hour flow proportional composite sample	2.5 µg/l	Method ALS WAS 076 ICP-MS	14/03/2024	
W1	Cr	--	24-hour flow proportional composite sample	0.69 µg/l	Method ALS WAS 076 ICP-MS	14/03/2024	
W1	Ni	--	24-hour flow proportional composite sample	4.9 µg/l	Method ALS WAS 076 ICP-MS	14/03/2024	

- [1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum - maximum' measured values.
- [2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with Natural Resources Wales is used, then the appropriate identifier is given. In other cases the principal technique is stated, for example gas chromatography.
- [3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.
- [4] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.
- [5] In the case of results for the Hazardous pollutants screen supply the quoted Limit of Detection (LOD) with the result.
- [6] In the case of daily flow supply the maximum and mean figure for each month within the 6 month reporting window.
- [7] If TOC is already monitored as a key process parameter, there is no need to measure COD, however the correlation between the two parameters must be established and checked regularly.
- [8] Hazardous pollutants screen substances are: Anthracene, Brominated diphenyl ether, Cadmium, C10-13 Chloroalkanes, Endosulphan, Hexachlorobenzene, Hexachlorobutadiene, Hexachloro-cyclohexane, Mercury and its compounds, Nonylphenol (4-Nonylphenol), Pentachlorobenzene, Polycyclic aromatic Hydrocarbons (PAHs), Tributyltin compounds (Tributyltin-cation) Report submitted January 2022 for Water Framework Directive Priority Hazardous Substances
- [9] For integrated or multi product mills where the BAT AEL range has been calculated according to a mixing rule based on their share of the discharge, based on information supplied by the Operator, the Operator must notify Natural Resources Wales if the product/ raw material mix changes by more than 10% in any direction.
- [10] kg/T Net annual production used for calculations based on BREF definition.

K. Mackin
 Signed Date: 27th January 2025
 (Authorised to sign as representative of Operator)

Permit Number: EPR/BU2489IT Operator: Intertissue Ltd
 Facility: Intertissue Neath Form Number: Performance 1 30/09/18

Reporting of other performance indicators for the period01/01/2024..... to31/12/2024.....

Parameter	Units
BOD/ADT	0.0193 kg/ADT
Suspended solids/ADT	0.076 kg/ADT
Total Nitrogen/ADT	0.0174 kg/ADT
Total Phosphorous/ADT	0.0058 kg/ADT
NOx	0.0003 Tonnes/ADT
CO ₂	0.2869 Tonnes/ADT
AOX	0.0001 kg/ADT
Total Energy Used	59,944.5 MWh
	28,597 m ³ Quarter 1
	32,331 m ³ Quarter 2
	35,840 m ³ Quarter 3
	39,928 m ³ Quarter 4
Effluent discharged	
Water usage	283,168 m ³

Operator's comments :
 Net annual production used for calculations based on BREF definition

Signed *K Mackie* Date: 27th January 2025
 (Authorised to sign as representative of Operator)

Permit Number: EPR/BU2489IT Operator: Intertissue Ltd
 Facility: Intertissue Neath Form Number: Performance 2 30/09/18

Reporting of Resource efficiency performance metrics for the period01/01/2024..... to31/12/2024.....

Parameter	Units		Methodology
	Total m ³ /p.a	m ³ /t	
Water			Measured or Calculated
Water inputs to the mill			
Surface water (actual not licensed) eg: river water	-	-	
Groundwater (actual not licensed) eg: borehole water	-	-	
Mains water (only report if used in the paper or pulp manufacturing process)	205,461	3.18	Measured – meter
Other water (eg: if rainwater harvesting is practised)	77,707	1.20	Measured – meter
Water used in manufacturing			
Cooling water (once through or hybrid systems)			
Process water	261,566	4.05	Calculated based on meter readings
Other water used in manufacturing	21,602	0.33	Boiler water - Measured - meter
Other inputs of water/moisture			
Pulp or other fibre or wood at X% moisture content ²			
Waste paper for recycling at X% moisture content ²			
Water outputs			
Waste Water discharged to surface waters <small>NB: this figure should be the one used to report water usage per tonne as per BREF benchmarks under BATC No.5 and should exclude site drainage and cooling water</small>	136,696	2.12	Measured – meter
Waste water discharged to sewer			
Losses to evaporation			
Losses in final product at Y% moisture content ²			
Losses in major waste stream outputs at Y% moisture content such as sludge ²			
Losses in major waste stream outputs at X% moisture content such as rejects (EWC 03 03 07) ²			

Parameter	Units	
	Total tonnes/p.a	Measured or Calculated
Waste		
Waste/raw material inputs (other than those reported via quarterly waste returns)		
Pulp		
Starch & main fillers		
Other significant raw material inputs if > 1000 tonnes		
Waste/raw material outputs (other than those reported via quarterly waste returns)		
Production (Net annual production reported as total as defined in the BREF BATCs¹)	64,555	Calculated

Notes:
 1. (i) For paper mills: the unpacked, saleable production after the last slitter winder, i.e. before converting. (ii) For off-line coaters: production after coating. (iii) For tissue mills: saleable production after the tissue machine before any rewinding processes and excluding any core. (iv) For marker pulp mills: production after packing (ADT). (v) For integrated mills: Net pulp, production refers to the production after packing (ADT) plus the pulp transferred to the paper mill (pulp calculated at 90% dryness, i.e. air dry). Net paper production same as (i)
 2. X% & Y% moisture content. Is defined as the average moisture content over the 12 month period. Monitoring frequency determined by each mill but to be noted on the return for each input/output.

Operator's comments :
 Net annual production used for calculations based on BREF definition

Signed *K Mackie* Date: 27th January 2025
 (Authorised to sign as representative of Operator)



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 only relating to the activity assessment
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 – Emissions to water, air or 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.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at 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.