

Compliance Assessment Report CAR_NRW0046762

Permit being assessed: DB3292FS.

For: Deeside Paper Mill, **held by:** Industrie Cartarie Tronchetti

At: Unit C, The Airfields Roadside & Retail, The Northern Gateway, Welsh Road, Queensferry, Deeside, Flintshire, CH5 2RD.

Type of assessment: Site Inspection,

Reason: Routine.

On: 26/03/2025 between 13:30 and 15:50.

Parts of permit assessed: various.

NRW Lead Officer: Rebecca Harwood, accompanied by Stuart Ross.

Report sent to: Health Safety & Environment Lead, Health, Safety & Environment Lead, on 31/03/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2F - Installations - Operations - Pre-operational conditions	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

This Compliance Assessment Report follows a prearranged visit to ICTs Deeside Paper Mill. Officers met with the Health, Safety and Environment Lead, Mill Director and Construction Project Manager.

The majority of the installation is still currently under construction, however, two of the converting lines have been installed and are being commissioned. The remaining converting lines are in the process of being installed and commissioned. Officers viewed the converting line operation and the ongoing construction works around the remainder of the site.

Commissioning of the Mill is to occur later in the year with cold commissioning of the gas turbine scheduled for autumn / winter 2025-2026.

Commissioning of the Effluent Treatment Plant (ETP) is scheduled for October / November 2025.

Officers discussed with the Operator MCERTs requirements for both air and water monitoring. The Operator has subsequently provided information relating to the stack monitoring platform and details of the flowmeter being installed.

The Operator confirmed that drainage covers will be colour coded and any interceptors and penstock valves will be clearly identifiable.

There are 5 pre operational (PO) conditions within the permit that need to be completed before operation.

PO1 - Commissioning Plan - NRW have agreed to a staged commissioning plan. The Operator should continue to keep NRW informed of commissioning timescales and update the commissioning plan as needed in respect of commissioning of the papermill and ancillary plant, including the CHP, boilers and ETP.

PO2 - Environmental Management System (EMS) - The Operator has submitted their initial EMS manual along with their major incident, fire and accident management procedures. NRW will review the submission in full once further commissioning work has taken place and prior to signing off this PO.

PO3 - MCP - to be addressed as part of the commissioning activities relating to the commissioning of the papermill and ancillary plant.

PO4 - Noise mitigation measures - the noise impact assessment (NIA) submitted as part of the permit application includes an offsite acoustic bund and fence as a noise control measure. One section of the bund and fence has been built but work on the remaining section has not started. The construction of this feature is understood to be linked through

planning conditions to the construction of the adjacent housing development.

ICT must demonstrate that the acoustic barriers meet the specification set out in the NIA before mill operations commence. This PO can only be discharged when the barriers are in place. The Operator stated that they are in contact with the planning authority regarding this. They also stated that they are revisiting the noise assessment and undertaking additional noise monitoring.

PO5 - Containment - further information demonstrating that the containment systems at the site meet CIRIA guidance C736 will be required.

Whilst NRW agreed that commissioning can occur in a staged approach, each stage must be agreed with NRW as stated in previous correspondence. The pre-operational conditions will not be discharged until all the requirements of those conditions have been formally approved.

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.