

Compliance Assessment Report CAR_NRW0050166

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: Report/Data Review,

Reason: Routine.

On: 13/10/2025.

Parts of permit assessed: Pre Op conditions.

NRW Lead Officer: Rebecca Harwood.

Report sent to: Health Safety & Environment Lead, Health Safety & Environment Lead, on 18/12/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2F - Installations - Operations - Pre-operational conditions	Action only (X)	

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?

Criteria	Action needed	Complete by
IR2F	see text below	31/01/2026

Compliance criteria codes are listed in the 'Important information' section below.

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 has been written following the submission of further information by the Operator in relation to Pre Operational (PO) Conditions 1 and 4.

PO1 - commissioning plan

PO1 states: *Prior to the operation of the paper mill a written commissioning plan (including timelines for completion) shall be submitted to Natural Resources Wales (NRW) for approval. The commissioning plan shall include but not be restricted to:*

- *The timetable for the commissioning of the effluent treatment plant (ETP), combined heat and power plants (CHP) and paper machines (PM1 & PM2) .*
- *The expected emissions to the environment during each of the stages of commissioning;*
- *The mitigation measures that will be taken in respect of emissions to the environment during each stage;*
- *The expected duration of commissioning activities;*
- *Any additional (beyond that required by the Permit) monitoring to be undertaken;*

Commissioning shall be carried out in accordance with the commissioning plan as approved.

It was agreed previously that the Operator could submit their commission plan in stages. The Operator submitted their commissioning plan to NRW on 20 November 2025. The plan relates to Stage 2 of Phase 1 of the site development and covers commissioning of the Water (Effluent) Treatment Plant, Turbine, Steam Boiler, Rewinder and Paper Mill. The plan stated that commissioning was to start on 24 November 2025 and continue through December and into January 2026.

The commissioning plan for Stage 2 is accepted by NRW.

Action: The Operator shall keep NRW informed of any changes or delays to the plan.

The Operator is reminded that Improvement Condition 1 requires the Operator to submit a written report in relation to commissioning within 6 months of commissioning.

PO4 - Noise

PO4 states *Following the completion of the mitigation measures outlined in the noise impact assessment (Receptor B - 2.6m high earth bund with 1.4m high acoustic barrier positioned on top running along the full boundary extent with the WG road. Receptor C a minimum 2.5m high acoustic barrier along the boundary extent with the WG road). A written report shall be submitted to Natural Resources Wales for approval confirming that the mitigation measures have been installed in line with those used in the noise impact assessment modelling.*

The noise impact assessment (NIA) submitted as part of the permit application included an offsite acoustic bund and fence as a noise control measure. It stated that at Receptor C there will be a *“Minimum 2.5m tall acoustic barrier along the full boundary extent with the Welsh Government road”* and this had been used as a mitigation measure in the NIA.

Several discussions were had between NRW Officers and the Operator in relation to the acoustic barriers used in the NIA. Having reviewed the Flintshire County Council planning portal, it appears that a barrier was included in the original outline planning permission and used in the Operators original NIA, but the housing developer subsequently designed out this requirement and this was not picked up at the time by the Operator. As such the requirements of PO4 could not be met.

A letter was received from the Operator on 13 October 2025. This highlighted that the bund referred to in the original NIA was not going to be constructed and stated *“An updated NIA has subsequently been updated and the noise model has been re-run no longer assuming the construction of a 2.5m high acoustic barrier. This NIA and noise model, without 2.5m high fence present shows no change in the results of estimated noise levels from the ICT Paper Mill Facility to nearest receptors. On this basis, there is no longer a need for a 2.5m high acoustic barrier to mitigate the impact of the residential amenity on properties now constructed on residential land C.”*

The Operator also submitted an updated NIA (Ref:1022988-CDL-XX-ZZ-RP-AS-45090; Revision 4; Revision date 02 October 2025) and noise modelling files, excluding the bund previously referred to. The NIA states that *“Overall, no adverse impacts are identified due to operational noise.”*

NRWs Air Quality and Noise Team have reviewed the submission and provided a response to the Industry Regulation Team.

“Impacts at the original modelled receptor C were 41.3 dB(A) and 42.2 dB(A), for ground and first floor locations respectively, which include the intervening acoustic barrier between the south east site boundary and receptor C. Our check modelling using the supplied inputs for the most recent sound propagation modelling provided by the applicant indicates that impacts at the original modelled receptor C location (not included in the most recent modelling), excluding the intervening acoustic barrier, are 42.1 dB(A) and 42.5 dB(A) for ground and first floor locations respectively.”

The report concludes that *“it is unlikely that omission of the acoustic barrier between the site and receptors in the residential development area identified in the submitted NIA’s as “receptor C” will result in a significant difference when assessing the specific sound from the facility against the background sound reported in 6-2 of the most recent NIA.”*

As such PO4, although not technically met, can be discharged. The Operator is reminded that a full BS4142 assessment is required as detailed in Improvement Condition 2 within 8 months of commissioning. Further measures may be required by the Operator depending on the results of the assessment.

The Operator is reminded that PO2, 3 and 5 also need to be met before operations can begin, in accordance with permit condition 2.5.1.

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.