

## Compliance Assessment Report CAR\_NRW0050457

**Permit being assessed:** NP3099FS.

**For:** Harp International Limited Gellihirion Hazardous Waste, **held by:** Harp International Ltd

**At:** Gellihirion Hazardous Waste, Reclamation and Storage Facility, GelliHirion Industrial Estate, Pontypridd, Rhondda Cynon Taff, CF37 5SX.

**Type of assessment:** Report/Data Review,

**Reason:** Routine.

**On:** 31/12/2025.

**Parts of permit assessed:** IR4B Reporting.

**NRW Lead Officer:** Brigid Armstead.

**Report sent to:** Quality & Environmental Manager, Harp International, on 23/01/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
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

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (hereafter NRW) assessment of the annual reports and Q4 waste returns for Harp International Permit EPR/NP3099FS.

### Quarter four 2025 Waste Returns

The Waste returns for quarter four (October – December) 2025 were received on the 19<sup>th</sup> of January 2026. A total of 5.4894 tonnes of EWC code 140601 was received during this quarter. All wastes are compliant, and the report is accepted.

### Annual Returns

The annual returns were received on the 22<sup>nd</sup> of January 2026. Reports on the annual total for water usage, energy usage, generation of wastewater and generation of residues were received.

### Waste & Residue Generation

A total of 41.905 tonnes of reportable waste was received by the site.

Quarterly reporting was for the following quantities:

Period	Tonnes
Q1	13.417
Q2	10.885
Q3	12.114
Q4	5.4894
Total	41.905

Residues generated are oil removed after reclamation of the waste refrigerant and exhausted molecular sieve after drying the waste refrigerant. Oil removed in 2025 = 380kg, exhausted molecular sieve = 375kg.

### Water Use

No water is specifically used in the process, water is primarily used for domestic purposes. The table below shows water usage trend.

Year	Mains water (m3)	Total waste treated (tonnes)	Staff (hours)	Water used per unit waste	Water used per staff hour worked
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				treated (m3/ tonne)	(m3/h)
<b>2021</b>	794	69.3	50524	11.5	0.016
<b>2022</b>	673	21.4	43951	31.4	0.015
<b>2023</b>	666	20	45621	33.3	0.015
<b>2024</b>	691	40	58724	17.3	0.012
<b>2025</b>	552	53	65355	10.4	0.008

The waste gas reclamation process does not require the use of water, and all site-related water consumption is limited to domestic purposes. Water use efficiency has improved compared to previous years, measured against both the volume of waste treated and total staff hours worked.

### Energy Usage

The table below shows overall energy usage trends.

Year	Electricity MWh	Natural Gas (MWh)	Total energy used (MWh)	Total waste treated (tonnes)	Energy use per unit waste treated ~ (MWh/ tonne)	Staff (hours)	Energy usage per staff hour (MWh /h)
<b>2021</b>	1280	128.7	1408.7	69.3	20.3	50524	0.028
<b>2022</b>	1150	142	1292	21.4	60.4	43951	0.029
<b>2023</b>	956	143	1099	20	55.0	45621	0.024
<b>2024</b>	1221	94	1315	40	17.6	58724	0.022
<b>2025</b>	1189	86	1275	53	24.1	65355	0.020

The table below shows specific activity energy usage trends

Year	Electricity (MWh)	RDA Sub- meter (KWh)	Purger Sub- meter (KW/h)	Natural Gas (MWh)	Total Primary Energy Used (MWh)	Total Waste treated (tonnes)	Energy Use per unit waste	Energy Use per unit waste treated (Plant
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							treated (MWh/ tonne)	Submeters) (KWh/ tonne)	
2021	1280	-	-	-	-	-	-	-	
2022	1150	4150	1165.1	142	1292	21.4	60.4	248.4*	
2023	956	2670	667	143	1099	20	55.0	166.9	
2024	1221	5297	954	94	1315	40	17.6	156.2	
2025	1189	5747	1210	86	1275	53	24.1	131.3	

\*The sub meters were installed part-way through 2022, as such, the 2022 figure doesn't provide an accurate representation.

Site gas and electricity consumption has decreased, with energy use per staff hour worked showing an improvement compared to previous years. Specific energy usage associated with the reclamation plant has also declined. Overall, energy efficiency across the site appears to be improving, which may reflect the operator's commitment to environmental performance as outlined in their accredited Environmental Management System

END.

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

### Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

### Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk)

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** [ask@ombudsman.wales](mailto: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.