

Compliance Assessment Report CAR_NRW0050492

Permit being assessed: CP3735PB.

For: Nantycaws Landfill EPR/CP3735PB, **held by:** CWM Environmental Ltd

At: Nantycaws Landfill Site Llanddarog Road , Nantycaws, Carmarthen, Carmarthenshire, SA32 8BG.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2025.

Parts of permit assessed: See Section 4.

NRW Lead Officer: Benjamin Taylor.

Report sent to: SHEQ and Landfill Compliance Manager, CWM Environmental Ltd, on 27/01/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(3) - Installations - Emissions and monitoring - Emissions to land	C3 Minor (Suspended)	Permit condition 3.2.3.
IR3A(3) - Installations - Emissions and monitoring - Emissions to land	C3 Minor (Suspended)	Permit condition 3.2.3.
IR4B - Installations - Information - Reporting	C4 No impact	Permit condition 4.2.2.
IR4B - Installations - Information - Reporting	C4 No impact	Permit condition 4.2.2.
IR4B - Installations - Information - Reporting	C4 No impact	Permit condition 4.2.2.
IR4C - Installations - Information - Notification	C3 Minor	Permit condition 4.3.2.
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	Permit condition 3.1.2.
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	Permit condition 3.1.2.
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	Permit condition 3.1.2.
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	Permit condition 3.1.2.
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	Permit condition 3.1.2.

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
monitoring - Emissions to water		
IR1A - Installations - Management - General Management	C3 Minor	Permit condition 1.1.1.
IR4C - Installations - Information - Notification	C3 Minor	Permit condition 4.2.3.
IR1A - Installations - Management - General Management	C3 Minor	Permit condition 1.1.1.
IR3A(3) - Installations - Emissions and monitoring - Emissions to land	C3 Minor (Suspended)	Permit condition 3.2.3.

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
15	36.3

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
IR3A(3)	CAR_NRW0050492.A1 - Suspended pending technical assessment of the HRA (2024) by NRW's Geoscience Team. If accepted, CWM Environmental will be required to vary their permit.	31/03/2026
IR3A(3)	CAR_NRW0050492.A2 - Suspended pending technical assessment of the HRA (2024) by NRW's Geoscience Team. If accepted, CWM Environmental will be required to vary their permit.	31/03/2026
IR4B	CAR_NRW0050492.A3 - CWM Environmental is to liaise with their consultant and ensure that the Quarterly Submissions are submitted within the timeframes specified by the EPR Permit.	Already completed
IR4B	As CAR_NRW0050492.A3 above.	Already completed
IR4B	As CAR_NRW0050492.A3 above.	Already completed
IR4C	CAR_NRW0050492.A4 - CWM Environmental Ltd must ensure that future breaches are reported to NRW by submitting a Schedule 6 Notification within the specified timeframes.	27/01/2026
IR3A(1)	CAR_NRW0050492.A5 - Ammoniacal Nitrogen/TSS at SW205a: CWM Environmental Ltd must investigate the surface water network upstream of SW205a to identify any potential sources of Total Suspended Solids (TSS) and Ammoniacal Nitrogen. Where any sources are identified,	27/02/2026

Criteria	Action needed	Complete by
	appropriate remedial actions must be taken. A report detailing the investigation, findings, and works completed must then be submitted to NRW as evidence.	
IR3A(1)	CAR_NRW0050492.A6 - MCPP at SW205a: CWM Environmental Ltd must investigate whether there is a linkage between the MCPP exceedances noted at UD5/Cell 1/2 Sump and the MCPP exceedances noted at SW205a. A report detailing the conclusion of this investigation must be submitted to NRW as evidence.	27/02/2026
IR3A(1)	CAR_NRW0050492.A7 - Ammoniacal Nitrogen/TSS at SW205a: CWM Environmental Ltd is required to investigate the upstream connectivity of the pipework discharging into the drainage ditch shown in Image 1. This investigation must confirm whether the pipework is receiving water from the adjacent Composting Site.	27/02/2026
IR3A(1)	CAR_NRW0050492.A8 - Ammoniacal Nitrogen/TSS at SW206: CWM Environmental Ltd must immediately implement measures to prevent the accumulation and discharge of surface water from the compost stockpile via discharge point SW206. In addition, the Operator is required to review the surface water management arrangements within the material stockpile area, and submit the findings of this review to NRW as evidence (action ongoing from CAR_NRW0050244).	30/01/2026
IR3A(1)	CAR_NRW0050492.A9 - Ammoniacal Nitrogen/TSS at SW206: CWM Environmental Ltd is to submit to NRW the most up to date Surface Water Management Plan for the Site (action from CAR_NRW0050244).	Already completed
IR1A	CAR_NRW0050492.A10 - CWM Environmental Ltd is to submit the updated Surface Water Management Plan to NRW as soon as it is available.	29/05/2026
IR4C	CAR_NRW0050492.A11 - CWM Environmental Ltd must ensure that future breaches are reported to NRW by submitting a Schedule 6 Notification within the specified timeframes.	27/01/2026
IR1A	CAR_NRW0050492.A12 - CWM Environmental Ltd must review their management procedures regarding reporting and notifying obligations and ensure that they are adhered to in the future.	28/04/2026
IR3A(3)	CAR_NRW0050492.A13 - Suspended pending technical assessment of the HRA (2024) by NRW's Geoscience Team. If accepted, CWM Environmental will be required to vary their permit.	31/03/2026

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Introduction

This Compliance Assessment Report (CAR) is regarding the assessment of the monitoring results for Quarter 1 (Q1), Quarter 2 (Q2), Quarter 3 (Q3) and Quarter 4 (Q4) in 2025, which were submitted by CWM Environmental Ltd (the Operator).

Scope

The following monitoring returns and reports have been assessed within this Compliance Assessment Report (CAR):

- Q1
 - CP3735PB Nantycaws Landfill Q1 2025 Leachates.
 - CP3735PB Nantycaws Landfill Q1 2025 Surface waters.
 - CP3735PB Nantycaws Landfill Q1 2025 Groundwater.
 - CP3735PB Nantycaws Landfill Q1 2025 Gas.
- Q2
 - CP3735PB Nantycaws Landfill Q2 2025 Leachates.
 - CP3735PB Nantycaws Landfill Q2 2025 Surface waters.
 - CP3735PB Nantycaws Landfill Q2 2025 Groundwater.
 - CP3735PB Nantycaws Landfill Q2 2025 Gas.
- Q3
 - CP3735PB Nantycaws Landfill Q3 2025 Leachates.
 - CP3735PB Nantycaws Landfill Q3 2025 Surface waters.
 - CP3735PB Nantycaws Landfill Q3 2025 Groundwater.
 - CP3735PB Nantycaws Landfill Q3 2025 Gas.
- Q4
 - CP3735PB Nantycaws Landfill Q4 2025 Leachates.
 - CP3735PB Nantycaws Landfill Q4 2025 Surface waters.

- CP3735PB Nantycaws Landfill Q4 2025 Groundwater.
- CP3735PB Nantycaws Landfill Q4 2025 Gas.

Quarter 1 2025: Monitoring Returns

Q1 monitoring data was submitted by the Operator on the 31st of March 2025 detailing measurements taken in relation to the following permit requirements:

- **Table S4.1** – *Leachate Level Limits and Monitoring*
- **Table S4.3** – *Point Source Emissions to Water (Other than Sewer)*
- **Table S4.5** – *Trigger Levels for Emissions into Groundwater*
- **Table S4.6** – *Landfill Gas in External Monitoring Boreholes*

This data was submitted outside the required 28 day reporting period, which is contrary to permit condition 4.2.3. On 4th of November 2025, CWM Environmental informed NRW that the late submission of the Q2 and Q3 monitoring data (discussed later in this CAR form) was due to an internal communication issue within their consultant, who submits data on the Operator's behalf. It is unclear whether this same issue also caused the late submission of the Q1 data. This failure has been compliance assessed later in the CAR.

The submitted data fulfilled all monitoring requirements outlined within permit condition 3.6.1a to 3.6.1d.

Leachate Level Limits and Monitoring

The parameters and associated permitted levels regarding leachate levels are specified within Schedule 4: Table S4.1 of the EPR permit.

There were no reported exceedances of leachate permitted levels or 'compliance limits' (formerly trigger levels) during the Q1 reporting period.

Point Source Emissions to Water (Other than Sewer)

The parameters and associated permitted levels regarding groundwater quality are specified within Schedule 4: Table S4.4 of the EPR permit.

There were no reported exceedances of permitted levels noted during the Q1 reporting period.

Emissions into Groundwater

The parameters and associated permitted levels regarding groundwater quality are specified within Schedule 4: Table S4.5 of the EPR permit.

4-Methylphenol

Table 1 below details a singular reported exceedance of 4-Methylphenol over the permitted level (0.001mg/l) during the Q1 reporting period.

Determinand	Monitoring Location	Date	Measured Value
4-Methylphenol	BH5/02	07/01/2025	0.00565mg/l

Table 1: List of 4-Methylphenol Exceedances - Q1 2025

The Operator has outlined that this is an isolated exceedance with no others observed within previous years.

The aforementioned exceedance of 4-Methylphenol is contrary to permit condition 3.2.3:

'The trigger levels for emissions into groundwater for the parameter(s) and monitoring point(s) set out in Table S4.5 of Schedule 4 shall not be exceeded'

The Operator submitted a revised Hydrogeological Risk Assessment (HRA) on the 9th of September 2024, this is awaiting technical review by NRW's Geoscience Team. It is noted that within Section 5.3.2 of the HRA (2024) 4-Methylphenol is absent from the proposed update to Table S4.5 – *Trigger levels for emissions into groundwater*, these 'Trigger Levels' are dictated by contaminants of concern (CoC) observed within the leachate source at the time of assessment. Should the revised HRA (2024) be approved by NRW's Geoscience Team, then the Operator should seek to vary their EPR permit in order to update the 'Trigger Levels' detailed within Schedule 4: Table S4.5.

Compliance:

Exceedance of the permitted 'Trigger Levels' associated with 4-Methylphenol as outlined within Schedule 4: Table S4.5 of the EPR permit (in its current version) is contrary to permit condition 3.2.3. However, this non-compliance score will be suspended pending technical assessment of the HRA (2024) by NRW's Geoscience Team. This non-compliance score will be unsuspending should the HRA (2024) be rejected following this technical assessment.

Cadmium (Cd)

Table 2 below details a singular reported exceedance of Cadmium over the permitted level (0.001mg/l) during the Q1 reporting period.

Determinand	Monitoring Location	Date	Measured Value
Cadmium	NACW228	07/01/2025	0.0011mg/l

Table 2: List of Cadmium Exceedances - Q1 2025

Cd was also detected within upgradient well (NACW229), however there is no permitted level associated with this monitoring point. Cd permitted levels within NACW228 have not been exceeded since January 2024.

Similarly as above, it is noted that within Section 5.3.2 of the HRA (2024) Cadmium is also absent from the proposed update to *Table S4.5 – Trigger levels for emissions into groundwater* which is awaiting technical assessment by NRW's Geoscience Team.

Compliance:

Exceedance of the 'Trigger Levels' associated with Cadmium (outlined within *Schedule 4: Table S4.5* of the EPR permit) is contrary to permit condition 3.2.3. However, as discussed above, this non-compliance score will be suspended pending technical assessment of the HRA (2024) by NRW's Geoscience Team.

A Schedule 6 Notification was submitted to NRW on the 23rd of January 2025 detailing the aforementioned exceedances of permitted 'Trigger Levels' in accordance with permit condition 4.3.2.

Landfill Gas in External Monitoring Boreholes

There were no reported exceedances of permitted levels noted during the Q1 reporting period.

Quarter 2 2025: Monitoring Returns

The Q2 monitoring data was submitted by the Operator on the 5th of August 2025.

This data was submitted outside the required 28 day reporting period, which is contrary to permit condition 4.2.3. On 4th of November 2025, CWM Environmental informed NRW that the late submission of the Q2/Q3 monitoring data was due to an internal communication issue within their consultant, who submits data on the Operator's behalf. This has been compliance assessed later in

this CAR form.

The submitted data fulfilled all monitoring requirements outlined within permit condition 3.6.1a to 3.6.1d.

Leachate Level Limits and Monitoring

There were no reported exceedances of leachate permitted levels or 'compliance limits' (formerly trigger levels) during the Q2 2025 reporting period.

Point Source Emissions to Water (Other than Sewer)

There were no reported exceedances of permitted levels noted during the Q2 2025 reporting period.

Emissions into Groundwater

The parameters and associated permitted levels regarding groundwater quality are specified within Schedule 4: Table S4.5 of the EPR permit.

There were no reported exceedances of groundwater permitted levels or 'compliance limits' (formerly trigger levels) during the Q2 2025 reporting period.

Landfill Gas in External Monitoring Boreholes

There were no reported exceedances of permitted levels noted during the Q2 reporting period.

Quarter 3 2025: Monitoring Returns

The Q3 monitoring data was submitted by the Operator on the 4th of November 2025.

This data was submitted outside the required 28 day reporting period, which is contrary to permit condition 4.2.3. On 4th of November 2025, CWM Environmental informed NRW that the late submission of the Q2/Q3 monitoring data was due to an internal communication issue within their consultant, who submits data on the Operator's behalf.

The submitted data fulfilled all monitoring requirements outlined within permit condition 3.6.1a to 3.6.1d.

Compliance:

CWM Environmental Ltd has failed to ensure the timely submission of the Q1, Q2 and Q3 Monitoring Data as required by permit condition 4.2.3. Consequently, a non-compliance score of C4 has been allocated to each submission failure against compliance criteria IR4B – Reporting.

Action:

CWM Environmental is to liaise with their consultant and ensure that the Quarterly Submissions are submitted within the timeframes specified by the EPR Permit (already completed).

Leachate Level Limits and Monitoring

The Q3 2025 submission detailed a singular 'exceedance' of specified levels, this is detailed within Table 3 below:

Monitoring Date	Location	Parameter	Measured Value	Trigger Level
01/07/2025	Cell 1/2 Sump	Mecoprop (MCCP)	0.132mg/l	0.071mg/l

Table 3: List of MCCP compliance limits exceedances in Q3 2025.

Cell 1/2 Sump does not have a permitted emission limit for Mecoprop, instead the exceeded figure is a trigger level detailed within the Installation's current Hydrogeological Risk Assessment (HRA) 2015. The detection of MCCP provides a useful tracking tool to enable site to determine a potential source of exceedances (of MCCP) in other areas of the Site.

In the permit Table S4.9 of Schedule 4 states:

'In the event that the 'trigger levels' detailed in Table HRA9 of the hydrogeological risk assessment (SLR Ref: 407- 0610-00011/HRA) dated May 2006 and section 3.1 of Appendix SS3 (SLR Ref: 407.0610.00011 dated June 2008) to the variation application received on 24/07/2008 are exceeded, the Agency shall be notified in writing within seven days of the result being received by the operator.'

Compliance:

The Operator failed to submit a Schedule 6 Notification to inform NRW of the above MCCP compliance limit exceedance as is specified within the permit. This is considered a contravention of permit condition 4.3.2. Consequently, a non-compliance score of C3 has been allocated against compliance criteria IR4C – Notification.

Action:

CWM Environmental Ltd must ensure that future breaches are reported to NRW by submitting a Schedule 6 Notification within the specified timeframes.

Point Source Emissions to Water (Other than Sewer)

There were no reported exceedances of permitted levels noted during the Q3 2025 reporting period.

Emissions into Groundwater

There were no reported exceedances of groundwater permitted levels or 'compliance limits' (formerly trigger levels) during the Q3 2025 reporting period.

Landfill Gas in External Monitoring Boreholes

There were no reported exceedances of permitted levels noted during the Q3 2025 reporting period.

Quarter 4 2025: Monitoring Returns

The Q4 monitoring data was submitted by the Operator on the 26th of January 2026. This was within the timeframe which is specified by permit condition 4.2.3.

The submitted data fulfilled all monitoring requirements outlined within permit condition 3.6.1a to 3.6.1d.

Leachate Level Limits and Monitoring

The Q4 2025 submission detailed a singular 'exceedance' of specified levels, this is detailed within Table 3 below:

Monitoring Date	Location	Parameter	Measured Value	Trigger Levels
07/10/2025	Cell 1/2 Sump	Mecoprop (MCCP)	0.132mg/l	0.0794mg/l

Table 4: List of MCCP compliance limits exceedances in Q4 2025.

Cell 1/2 Sump does not have a permitted emission limit for Mecoprop, instead the exceeded figure is a trigger level detailed within the Installation's current Hydrogeological Risk Assessment (HRA) 2015. The detection of MCCP provides a useful tracking tool to enable site to determine a potential source of exceedances (of MCCP) in other areas of the Site.

In the permit Table S4.9 of Schedule 4 states:

'In the event that the 'trigger levels' detailed in Table HRA9 of the hydrogeological risk assessment (SLR Ref: 407- 0610-00011/HRA) dated May 2006 and section 3.1 of Appendix SS3 (SLR Ref:

407.0610.00011 dated June 2008) to the variation application received on 24/07/2008 are exceeded, the Agency shall be notified in writing within seven days of the result being received by the operator.'

Compliance:

The Operator failed to submit a Schedule 6 Notification to inform NRW of the above MCPP compliance limit exceedance as is specified within the permit. This has been compliance assessed later in this section.

Point Source Emissions to Water (Other than Sewer)

During the Q4 reporting period, there were six exceedances of the permitted ELVs to controlled waters which are specified within *Table S4.3*. These are detailed within Table 4 below:

Monitoring Date	Location	Parameter	Measured Value	Emission Limit Value (ELV)
07/10/2025	SW205a	Ammoniacal Nitrogen as N	1.12mg/l	1.0mg/l
07/10/2025	SW205a	Mecoprop (MCP)	0.000239mg/l	0.000055 mg/l
02/12/2025	SW205a	Total Suspended Solids (TSS)	84.9mg/l	70mg/l
02/12/2025	SW205a	Ammoniacal Nitrogen as N	1.13mg/l	1.0mg/l
02/12/2025	SW206	Total Suspended Solids (TSS)	88.5mg/l	50mg/l
02/12/2025	SW206	Ammoniacal Nitrogen as N	1.10mg/l	1.0mg/l

Table 5: List of Surface Water ELV exceedances in Q4 2025.

Permit condition 3.1.2 detailed below states:

'The limits given in that Schedule shall not be exceeded, save that compliance with an emission limit shall include incorporation of the uncertainty allowance stated in Agency guidance LFTGN 05 and LFTGN 08.'

There have been growing concerns within NRW regarding surface water management on site, particularly in the vicinity of SW206. These concerns prompted an NRW-initiated and led surface water sampling exercise on the 12th of November 2025 (see *CAR_NRW0050244*). Samples collected by NRW identified exceedances of permitted ELVs for Total Suspended Solids (TSS) and Ammoniacal Nitrogen, indicating a potential chronic issue with emissions to controlled waters for these parameters. CWM Environmental Ltd must investigate and identify the source(s) of these permit breaches and implement measures to prevent any ongoing contributions.



Image 1: Evidence of a discoloured discharge believed to be entering the surface water network associated with the Phase 2 Landfill

It is important to note that during site visits on 7th and 12th of November 2025, NRW officers observed a discoloured discharge entering a drainage ditch in the vicinity of the Composting Site (EPR/EP3698FL). The discharge appeared to enter the ditch via pipework running beneath the unmade road leading towards the adjacent site.

The drainage ditch was traced downstream by NRW Officers and is believed to potentially form part of the surface water network associated with the Nantycaws Phase 2 Landfill. It is currently unclear whether this discharge is the source of the exceedances recorded at monitoring point SW205a during this reporting period, or where the discoloured discharge originated from. CWM Environmental Ltd must ensure that there are no upstream sources capable of influencing permitted monitoring points associated with the landfill permit.

To satisfy an action detailed within *CAR_NRW0050244*, CWM Environmental Ltd submitted their current Surface Water Management Plan (*Surface Water Management Plan*), this is a 2009 dated document and consequently may no longer be representative of the current conditions onsite. NRW were informed during the submission that the third-party consultancy working on behalf of CWM Environmental Ltd are in the process of reviewing and updating this document. Once completed, this must be shared with NRW for their records.

Compliance:

CWM Environmental Ltd has failed to adhere to the specified ELVs (TSS, Ammoniacal Nitrogen, Mecoprop) for emissions to controlled waters during the Q4 2025 reporting period. This is a contravention of permit condition 3.1.2. Consequently, a non-compliance score of C3 has been allocated to each of the following:

- Ammoniacal Nitrogen as N exceedance at SW205a.
- Mecoprop exceedance at SW205a.
- Total Suspended Solids (TSS) at SW205a.
- Ammoniacal Nitrogen as N exceedance at SW206.
- Total Suspended Solids (TSS) at SW206.

Where possible, in accordance with NRW's scoring guidelines. The scores have been consolidated into a singular non-compliance score (i.e. multiple Ammoniacal Nitrogen as N at SW205a as shown in Table 3).

Action:

Ammoniacal Nitrogen/TSS at SW205a: CWM Environmental Ltd must investigate the surface water network upstream of SW205a to identify any potential sources of Total Suspended Solids (TSS) and Ammoniacal Nitrogen. Where any sources are identified, appropriate remedial actions must be taken. A report detailing the investigation, findings, and works completed must then be submitted to NRW as evidence.

Action:

Ammoniacal Nitrogen/TSS at SW205a: CWM Environmental Ltd is required to investigate the upstream connectivity of the pipework discharging into the drainage ditch shown in Image 1. This investigation must confirm whether the pipework is receiving water from the adjacent Composting Site.

Action:

MCPP at SW205a: CWM Environmental Ltd must investigate whether there is a linkage between the MCPP exceedances noted at UD5/Cell 1/2 Sump and the MCPP exceedances noted at SW205a. A report detailing the conclusion of this investigation must be submitted to NRW as evidence.

Action:

Ammoniacal Nitrogen/TSS at SW206: CWM Environmental Ltd must immediately implement measures to prevent the accumulation and discharge of surface water from the compost stockpile via discharge point SW206. In addition, the Operator is required to review the surface water management arrangements within the material stockpile area, and submit the findings of this review to NRW as evidence (action ongoing from CAR_NRW0050244).

Action:

Ammoniacal Nitrogen/TSS at SW206: CWM Environmental Ltd is to submit to NRW the most up to date Surface Water Management Plan for the Site (action from CAR_NRW0050244,

action completed).

In addition, NRW also considers there to be a failure to enact sufficient control measures to prevent pollution, this is considered indicative of inadequate management procedures onsite regarding surface water management. As a result, NRW considers this to be an additional contravention of permit condition 1.1.1. Consequently, a non-compliance score of C3 has also been attributed against compliance criteria IR1A – General Management. As outlined previously, the Operator is currently in the process of reviewing and updating their Surface Water Management Plan via their third party consultant.

Action:

CWM Environmental Ltd is to submit the updated Surface Water Management Plan to NRW as soon as it is available.

Permit condition 4.3.1b below states:

'The Agency shall be notified without delay following the detection of:

(b) the breach of a limit specified in the Permit;'

Permit condition 4.3.2 below states:

'Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in Schedule 6 to this Permit within the time period specified in that schedule.'

The Operator failed to submit Schedule 6 Notifications to inform NRW of any of the surface water compliance limit exceedances that are outlined within Table 5 above, this is a contravention of permit condition 4.3.2. Consequently, a non-compliance score of C3 has been allocated against compliance criteria IR4C – Notification.

- In accordance with NRW's scoring guidelines, score regarding failure to notify in the Q4 reporting period has been consolidated into a singular non-compliance score.

Action:

CWM Environmental Ltd must ensure that future breaches are reported to NRW by submitting a Schedule 6 Notification within the specified timeframes.

The repeated failure to notify NRW of permit breaches in 2025 is also considered indicative of inadequate management systems onsite. As a result, NRW considers this to be an additional contravention of permit condition 1.1.1. Consequently, a non-compliance score of C3 has also been

attributed against compliance criteria IR1A – General Management.

Action:

CWM Environmental Ltd must review their management procedures regarding reporting and notifying obligations and ensure that they are adhered to in the future.

Emissions into Groundwater

The parameters and associated permitted levels regarding groundwater quality are specified within Schedule 4: Table S4.5 of the EPR permit.

There was a singular exceedance of Mecoprop (MCP) in groundwater reported for the Q4 reporting period, this is detailed within Table 6 below:

Monitoring Date	Location	Parameter	Measured Value	Emission Limit Value (ELV)
07/10/2025	UD5	Mecoprop (MCP)	0.00028mg/l	0.000055 mg/l

Table 6: List of groundwater ELV exceedances in Q4 2025

As outlined within the Quarter 1 2025: Monitoring Returns Section, the Operator submitted a revised Hydrogeological Risk Assessment (HRA) on the 9th of September 2024 which is awaiting technical review by NRW’s Geoscience Team. It is noted that within Section 5.3.2 of the HRA (2024) that UD5 has been omitted as a monitoring point from the proposed update to Table S4.5 – *Trigger levels for emissions into groundwater.*

Compliance:

Exceedance of the permitted ‘Trigger Levels’ for Mecoprop (MCP) detailed within *Schedule 4: Table S4.5* of the EPR permit (in its current version) is contrary to permit condition 3.2.3. However, this non-compliance score will be suspended pending technical assessment of the HRA (2024) by NRW’s Geoscience Team. This non-compliance score will be unsuspending should the HRA (2024) be rejected following this technical assessment.

The Operator failed to submit Schedule 6 Notifications to inform NRW of the groundwater water compliance limit exceedance detailed within Table 6 above. As previously outlined, this has already been compliance assessed and consolidated into a single score for the Q4 reporting period.

Landfill Gas in External Monitoring Boreholes

There were no reported exceedances of permitted levels noted during the Q4 reporting period.

Please note: This CAR report and assessment was undertaken on 27th of January 2026. However to ensure that the non-compliance score is attributed to the correct financial year (for billing) the date on CARS system has been altered to 31st of December 2025.

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

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

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.