

Compliance Assessment Report CAR_NRW0050500

Permit being assessed: LP3038SU.

For: Nantycaws Generation Plant EPR/LP3038SU, **held by:** Novera Energy Generation No.2 Limited

At: Nantycaws Landfill Site Llanddarog Road , Nantycaws, CARMARTHEN, Dyfed, 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: Compliance Manager, Infinis Energy Ltd, on 28/01/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1D - Installations - Management - Efficient use of raw materials	Assessed (A)	
IR1E - Installations - Management - Avoidance, recovery and disposal of wastes produced by the activities	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) is regarding the assessment of the monitoring data and annual report, which were submitted by Infinis Energy Ltd (the Operator) to cover the 2025 reporting period.

Scope

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

- Nantycaws Annual engine emissions 2025 V2 (002)
- LSW 250605 Infinis Nant Y Caws LFG Report version 1
- 2025 Nanty Annual Report
 - Fugitive Emissions Review (4.1.4).
 - Raw Materials (& Water) Assessment Table (S4.2 / 2.4).
 - Waste Minimisation, Recovery and Disposal Assessment (2.6.2).
 - Annual Reporting of Other Performance Indicators.
 - Reporting of Performance Indicators (Form Ref: PI1).
 - Accident Management Plan Review.

2025 – Annual Engine Emissions Review

Engine Emissions

The monitoring data was submitted by the Operator on the 26th of June 2025, which is in accordance with the timeframe specified by permit condition 4.1.2. The monitoring data was resubmitted on the 16th of January 2026 following identification of a minor administrative error by the Operator, whereby the asset (Engine 3) was being incorrectly referred to as Engine 2 on their template. The Operator has confirmed to NRW that this updated template will be used going forward to prevent any further confusion.

As previously outlined in *CAR_NRW0045629*, the onsite engines have been replaced with a

smaller unit to address the reduced volumes of landfill gas (LFG) being generated by the adjacent landfill complex. Since this replacement, the Annual Report shows a notable improvement in engine operating time. Infinis Energy Ltd has attributed this improvement of the engine operation time as being better suited to the site's current gas production levels.

The monitoring parameters and associated Emission Limit Values (ELVs) are detailed within *Table 2.2.2*. From the emissions testing on the 4th of June 2025, there were no reported exceedances of these ELVs by the Operator.

Trace Gas

It is noted that under permit condition 2.2.8.1 there is the requirement to annually monitor and report the quality of landfill gas entering the compound.

On review of NRW's records, it appears that this reporting requirement is submitted against an alternative permit (EPR/CP3735PB) relating to the adjacent Nantycaws Phase 2 Landfill Permit. Review of the most recent available document (*LSW 250605 Infinis Nant Y Caws LFG Report version 1*), it is noted that the works are commissioned by Infinis Energy Ltd, and also details the Gas Utilisation Plant (GUP) permit number (EPR/LP3038SU) within the header. This *LSW 250605 Infinis Nant Y Caws LFG Report version 1* document was submitted on the 27th of January 2026 and as a result, the requirements of permit condition 2.2.8.1 have been met.

2025 – Annual Submission Review

The reporting form (*Annual Permit Report*) was submitted by the Operator on the 16th of January 2026, which was within the specified timeframe (by the 31st of January 2026) in accordance with permit condition 4.1.3.

The report detailed all informative requirements (Schedule 4: Tables S4.1 and S4.2) set out by NRW within permit condition 4.1.3. Furthermore, the Operator demonstrated the maintaining of tables relating to raw materials and waste recovery/disposal in accordance with permit conditions 2.4.1.1 and 2.6.2 respectively.

Following assessment of the annual report, the subsequent observations were noted:

- Performance Indicators:
 - 2387MWh Total Production.
 - 2,179MWh Exported
 - Volume of Landfill Gas treated 1,501,689m³
 - Engine downtime: 6.2%

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.