

## Compliance Assessment Report CAR\_NRW0050609

**Permit being assessed:** BP1772IZ.

**For:** Poeton Cardiff, **held by:** Poeton (Cardiff) Limited

**At:** Poeton (Cardiff) Ltd, 283 Penarth Road, Cardiff, Cardiff, CF11 8UL.

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

**Reason:** Routine.

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

**Parts of permit assessed:** 1.1, 4.2.2, 4.2.3, 3.1.2.

**NRW Lead Officer:** Dale Padfield.

**Report sent to:** -, HSE & Facilities Manager, on 06/02/2026.

### 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	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	
IR1D - Installations - Management - Efficient use of raw materials	Assessed (A)	
IR1C - Installations - Management - Energy Efficiency	Assessed (A)	
IR1E - Installations - Management - Avoidance, recovery and disposal of wastes produced by the activities	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	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?

Criteria	Action needed	Complete by
IR4B	Action 1 – Poeton 06/02/2026: submit monthly total effluent volumes for 2025, as required by permit condition 4.2.3(a).	31/03/2026
IR1A	Action 2 - Poeton 6th of February 2026: Provide NRW with a report on the findings / outcomes of the tasks listed in A1.1, A1.2 and A1.3.	06/03/2026
IR1A	Action 3 Poeton 6th of February 2026: Provide NRW with a copy of the CIRIA C736 bund survey report and a copy of the ETP commissioning report once available.	28/02/2026

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

**Poeton (Cardiff) Limited**

**EPR/BP17712IZ**

This compliance assessment report details the following:

- 6 Monthly emissions reporting (July – December 2025) emissions to sewer S1
- Annual performance reporting review for 2025
- Response to actions issued in CAR\_NRW0049038
- Response to actions issued in CAR\_NRW0050205

### **6 monthly (July – December) 2025 emissions to sewer (S1)**

All parameters within their respective ELVs, with the exception of cadmium, pH and cyanide, schedule 5 notification received for the cadmium and pH exceedance and scoring already applied in previous CAR form. No non-compliance issued for cyanide exceedance as this was a spot sample by DCWW, with site composite within permitted levels, the details of which are captured in a previous CAR. The flow total has not been reported, although there is no limit, it a requirement of the permit to report monthly totals on the annual return, as detailed in table S4.1. An action will be issued to submit this data. All other aspects of the report are accepted.

**Action 1 – Poeton 06/02/2026:** submit monthly total effluent volumes for 2025, as required by permit condition 4.2.3(a). **Due 31/03/2026**

## **Annual Performance Reporting Review 2025**

### Business Overview

Operations remain relatively stable at the Cardiff facility, in 2024 Poeton processed 25% fewer parts due to shifting small-part work abroad, but still increased turnover by 4.3%. In 2025 part volumes dropped a further 7.1% as low-margin high-volume work was phased out; turnover again increased. Workforce increased from 82 staff (2024) to 84 staff (2025).

### Energy usage & CO<sub>2</sub> emissions

Energy consumption reduced from 3,510.9 MWh (2024) to 3,314.3 MWh (2025).

Energy per operating hour fell from 0.54 to 0.51 MWh/hr.

CO<sub>2</sub> emissions reduced from 597 t to 563.6 t.

Improvements linked to equipment upgrades, lighting improvements, and better shutdown discipline.

### Water use efficiency

Total water use fell from 23,763 m<sup>3</sup> in 2024 to 18,487 m<sup>3</sup> in 2025 (22% reduction).

Water per operating hour improved from 3.71 to 2.89 m<sup>3</sup>/hr.

Improvements driven by operator awareness, switching off rinses, and tank insulation (“croffles”).

### Waste management

Hazardous waste increased from 31.63 t (2024) to 50.3 t (2025), with the cause reported as mainly due to clearing of accumulated waste and decommissioning obsolete processes.

Recycled waste decreased from 21.9 t to 17.4 t, though core recycling practices remain strong.

### Mass release of cadmium and mercury

The mass release of mercury continues to be 0.002 mg as in previous years. Cadmium reduced significantly: 4.76 kg (2024) to 3.30 kg (2025).

Overall energy and water usage appears to be trending in a positive direction, with the continuous improvements having a beneficial impact on efficiencies. Hazardous waste continues to be reported at increased tonnages, although this years increase appears to be due to operational clear-outs as reported in the previous year, and not process efficiency. However, avoidance of waste generation is a permit requirement and this will be assessed in more detail.

A new effluent treatment plant (ETP) is being installed to replace the current aging ETP infrastructure. A permit variation is with NRW permitting team.

### **Response to actions issued in CAR NRW0049038**

The actions are copied below for ease of reference.

**Action 1** - Poeton to ensure all level control switches for process tank immersion heaters are included on the planned preventative maintenance schedule. Ensuring functionality checks are conducted and recorded. Please provide NRW with conformation this has been completed.

**Action 2:** Poeton to establish and record the routing of all site drains and subsurface pipework and include a detailed drainage plan within the sites EMS. Provide NRW with a copy once complete.

**Action 3:** Following completion of Action 2, Poeton should implement an inspection routine to assess any subsurface pipework and drainage to ensure it remains leak free and suitable for use. The inspection should form part of the sites planned preventative maintenance regime, and be scheduled at appropriate intervals. Any defective pipework or drainage detected during the inspections, which may pose a risk of pollution, should be scheduled for repair without delay. Provide NRW with details of the PPM regime for subsurface pipework and drainage once implemented and a copy of any inspection reports once undertaken.

Responses to the above actions:

Action 1: Poeton provided evidence from their quality management system 'TPM maintenance' demonstrating checks are now in place for the level probe sensors for all tanks in general plating, anodising and NDT areas. This action is considered complete.

Action 2: A drainage survey report was submitted detailing a survey undertaken on the 15<sup>th</sup> of December 2025. The following structural defects were identified on various sections of the drainage:

**L1 - Fracture, circumferential at 12 o'clock**

**F1 - Crack, circumferential at joint from 7 o'clock to 10 o'clock**

**F1 - Crack, longitudinal at 12 o'clock**

**F1 - Crack, circumferential at joint from 2 o'clock to 4 o'clock**

**L1 - Open joint, large**

**L2 - Open joint, medium**

**L4 - Fracture, circumferential at joint at 12 o'clock**

**L2 - Open joint, medium**

The action is considered on-going: A requirement of the action was to undertake repairs of defective drainage pipework. Defects and connectivity issues have been identified within site drainage sections

(as referenced above). From the information available it is clear that there is a possible pathway for contaminated effluent to enter the environment. However, it is unclear what risk the defects identified pose to the environment, as the drainage and process linkages are unclear, i.e., it is unclear what effluents or waste waters the drainage sections carry. As such, the action below is issued.

**Action 2 - Poeton 6<sup>th</sup> of February 2026:** Provide NRW with a report on the findings / outcomes of the tasks listed in A1.1, A1.2 and A1.3. **Due 06/03/2026**

**A1.1 . Map linkages & characterise waste waters :** Confirm which site processes/areas discharge to the sections identified with defects, and whether the drainage lines are foul domestic, process effluent to treatment, process effluent post treatment or surface water, and identify what contaminants are likely present.

**A1.2. Carry out a source–pathway–receptor risk assessment covering:**

1. Sources: Effluent type and contaminant profile per section (from A1).
2. Pathways: Defect type/severity and potential for leakage/overflow; ground conditions (made ground, permeability), drainage construction material, depth, and proximity to unsealed surfaces.
3. Receptors: On-site soils, groundwater, surface waters or sensitive receptors.
4. Likelihood & Consequence: Use a qualitative matrix (Low/Med/High) or semi-quantitative approach, with justification and uncertainty.
5. Risk Conclusions: Identify lines/sections where risk is unacceptable (e.g., medium/high risk) and requires immediate control/repair.

**A1.3. Repairs and/or Control Measures**

For any line/section where risk is unacceptable (from A2):

1. Immediate Controls: Actions to mitigate risk pending repair (e.g., isolate/divert flow, reduce loading, temporary bypass measures, increased inspection).
2. Permanent Repairs: Scope of works (e.g., patch repair, re-line, re-lay, seal joints, replace gaskets, reinstate manholes, correct misconnections or install isolation valves)
3. Post-Repair Verification: Evidence plan (e.g., post-repair CCTV, pressure/leak testing, dye tests, commissioning checks, updated plans).

### **Response to actions issued in CAR NRW0050205**

The actions are copied below for ease of reference.

**Action 1:** Poeton to check all remaining bunds to ensure bund liners are welded and fit for purpose. Provide NRW with confirmation once complete.

**Action 2:** Poeton should ensure that all new plant and infrastructure is subject to formal commissioning and sign-off, this will be of particular importance with regards to the new ETP. Provide NRW with confirmation once this has been implemented.

**OMA Actions:**

**Action OMA 2 ~ 2:** Modify collection vessel lid to ensure it fits the vessel correctly.

**Action OMA 2 ~ 4:** Poeton to review PCD 54 against ISO 11885 to ensure all requirements of the standard are incorporated in the method, or that any deviations provide equivalent quality.

**Action OMA 2 ~ 5:** Poeton to introduce a formal review to ensure in house methods used for analysis remain in-line of the most appropriate standard. In particular, any development in standards directly referencing the use of MP-AES for the analysis of waste waters and effluents. Should any developments occur, Poeton should update any internal methods to reflect the most appropriate standard.

Response to actions

Action 1: A CIRIA C736 bund compliance survey was completed on the 28/01/2026, with the report due on the 11/02/2026. Provide NRW with a copy once available.

Action 2: Poeton reported that the 'stage one' ETP commissioning was to take place on the 4<sup>th</sup> of February 2026 and the report to be sent once received. Provide NRW with a copy once available.

**Action 3 Poeton 6<sup>th</sup> of February 2026:** Provide NRW with a copy of the CIRIA C736 bund survey report and a copy of the ETP commissioning report once available. **Due 28/02/2026.**

OMA actions

OMA 2 ~ 2: Photo received demonstrating the lid now fits securely on the collection tank. Action complete.

OMA 2 ~ 4: Two minor findings were found during the review of PCD 054 against ISO 11885. These were reported as:

*"Specification states to perform check against highest concentration standard whereas PCD 054 performed checks against mid-range standard. This has been corrected in practice and added to the new version of PCD 054 due to be issued alongside the ETP phase 1 commissioning.*

*Specification recommends wavelengths for certain elements; however, the manufacture recommends alternative wavelengths which are more suitable for the equipment. The manufacturer's*

*recommendations are considered to supersede the standard, especially as it is slightly different equipment.”*

Action OMA 2 ~ 4 is considered complete.

OMA 2 ~ 5: Poeton undertake a 24 month review of all PCDs, as managed in their Q-pulse system. The group technical manger is a BSI committee member and has enquired with BSI to be notified for any developments of a standard relating to the MP-AES. This action is considered complete.

Remaining OMA actions are to be reviewed once information is submitted.

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.