

Compliance Assessment Report CAR_NRW0050727

Permit being assessed: EP3738NG.

For: Bridgend Paper Mill, **held by:** WEPA UK Ltd

At: Llangynwyd, Meesteg, Bridgend, MID GLAMORGAN, CF34 9RS.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2025.

Parts of permit assessed: 1.2.1(a), 3.1 .2, 4.2.2.

NRW Lead Officer: Dale Padfield.

Report sent to: ~, Energy and Environment Manager, on 17/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1C - Installations - Management - Energy Efficiency	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	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

Wepa UK Ltd

Bridgend Paper Mill

EPR/EP3738NG

This compliance assessment report (CAR) captures the following:

- Annual emissions and reporting review – 2025.

Emissions to air

Forms Air 1 and Air 2 received within reporting window. Emission points A4, A11, A14 and A15 all with their respective ELVs. Reports accepted.

Emissions to Water

All parameters reporting within their respective ELV's for emission point W1 with the exception of temperature, the non-compliance is captured in CAR_NRW0050524. Report accepted.

To note: units of measurement should be included for measurements where there aren't any associated ELV's, as it is unclear what units the measurements are being reported in.

Performance 1 reporting form

Performance indicators within expected ranges and within annual limits where applicable. Report accepted.

Sludge analysis

Analysis reports received, sludge within expected ranges. Report accepted.

Environmental performance review

Natural Resources Wales has reviewed the operator's Environmental Performance reports and 2025 relating to Bridgend Paper Mill. Overall, the site has demonstrated continued compliance with the conditions of Environmental Permit EP3738NG, and the operator has maintained appropriate environmental controls across air emissions, effluent discharges and energy use.

Air emissions were compliant with permit limits. Testing undertaken at the Jupiter and Neptune hood

exhaust vents confirmed a downward trend in NO_x emissions in 2025, compared with higher values in 2024 .

The decommissioning of the CHP plant and commissioning of two new low-pressure gas boilers was undertaken in 2025, both of which operated well below consented limits.

Emissions to Water

Effluent quality remained within all permitted limits for COD, suspended solids, nitrogen, phosphorus, BOD, ammonia and AOX. The only exception was a single temperature exceedance in August 2025, where a discharge temperature of 25.8°C resulted in a Schedule 5 notification. No other breaches occurred, and daily discharge volumes continued to remain significantly below the 17,500 m³/day limit, typically below 4,000 m³/day in 2024 and below 5,000 m³/day in 2025.

An Operator monitoring assessment was conducted in January 2026, some improvements are ongoing.

Performance Parameters

Key performance parameters (NO_x/ADT, BOD/ADT, COD/ADT, Suspended Solids/ADT, N and P nutrients, AOX) remained broadly stable. Improvements were noted in CO₂/ADT, nitrogen nutrient levels, and AOX in 2025, while occasional higher peaks were observed for BOD and COD. All parameters remained compliant.

Water Use

Water consumption increased from an average of 12.8 m³/ADT in 2024 to 15 m³/ADT in 2025, yet remained comfortably below the BREF benchmark of 20 m³/ADT. The operator has acknowledged elevated use associated with the Jupiter machine, which is scheduled for closure in 2026, with significant reductions anticipated following the planned commissioning of the Vesta machine in 2027.

Waste and Sludge Management

The operator continued to comply with waste management obligations, including increased segregation and recycling in line with Welsh workplace recycling requirements introduced in 2024. Sludge removal data for both years indicates stable operation.

Aspects of hazardous waste and hazardous inventory storage were audited in December 2025, further information was requested from the operator, this will be reviewed and captured in a separate CAR form.

Energy and Carbon Management

Energy use remained stable, with substantial investment in energy efficiency through the replacement of the CHP system with a high-efficiency boiler plant in 2025. Additional initiatives including EV charging, solar PV feasibility assessment, hydrogen/electric FLT trials, and a small scale carbon capture trial demonstrates the operator's commitment to continuous improvement and decarbonisation.

An incident involving a fire at the installation took place on Monday the 2nd of February 2026. The details of which, including any assessment against the environmental permit will be captured in a separate CAR form.

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

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.