

Compliance Assessment Report CAR_NRW0050601

Permit being assessed: SP3531SK.

For: Gwent Waste Management Centre NRW/EPR/SP3531SK/V007, **held by:** Tradebe Gwent Limited

At: Gwent Waste Management Centre Corporation Road, Corporation Road, Newport, NP19 4RD.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2025.

Parts of permit assessed: See comments section.

NRW Lead Officer: David Thomson.

Report sent to: Redacted, Site Manager, on 23/02/2026.

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	C4 No impact	4.2.3
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2 (Q3 period)
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2 (Q4 period)
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR4C - Installations - Information - Notification	C4 No impact	4.3.2(b)(i) and 4.3.3. (Q3 period)
IR4C - Installations - Information - Notification	C4 No impact	4.3.2(b)(i) and 4.3.3. (Q4 period)

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

Total non-compliances recorded	Total non-compliance score
6	12.3

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
IR4B	The operator shall submit future reporting forms within the 28 day reporting window as required by permit condition 4.2.3.	Already completed
IR3A(1)	See action under (IR1A) General Management	Already completed
IR3A(1)	See action under (IR1A) General Management	Already completed
IR1A	<p>The operator shall submit, for approval, a voluntary compliance plan outlining the actions to be taken to prevent further AOX limit exceedances. This plan should also include:</p> <ul style="list-style-type: none"> - Details of the AOX abatement measures to be instated to achieve BAT, as set out in 'Best Available Techniques (BAT) Reference Document for Waste Treatment' (the BRef), including an explanation of how the chosen measure(s) achieve BAT (please refer to specific BRef BAT Conclusion numbers as necessary). - A step-by-step description of actions to be undertaken to achieve BAT and return to permit compliance. - Timescales for each action, including start and end dates. - Details of which steps have already started or been completed. - Details of interim mitigation measures to manage ongoing risk of ongoing AOX limit exceedance. - An installation & commission plan for any new plant requirements. - A review of the written management system with consideration to new procedures and/or plant required to control AOX emissions. 	30/04/2026
IR4C	The operator shall submit future schedule 5 Part A (b) notifications to NRW within 24 hours of detecting a permitted limit exceedance.	Already completed
IR4C	The operator shall submit future schedule 5 Part A (b) notifications to NRW within 24 hours of detecting a permitted limit exceedance.	Already completed

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

Assessment Details

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (hereafter NRW) assessment of Tradebe Gwent Limited's (hereafter the operator) 6-monthly (July to December 2025) reporting form submission against the relevant environmental permit conditions for Reporting, Emissions & Monitoring and Notifications.

Documents submitted by the operator

- Q3 Sewer1 - SP3531SK - 01.07.25-30.09.25 Redacted.pdf
- Q4 Sewer1 - SP3531SK - 01.10.25-30.12.25 Redacted.pdf
- H2 EPR-SP3531SK_ Form_Air1 - 01.07.2025-31.12.2025 Redacted.pdf
- Schedule 5 - Notification - AOX Q3 2025 - GWMC Redacted.pdf
- Schedule 5 - Notification - AOX Q4 2025 - GWMC - 2 Redacted.pdf

Reporting (IR4B)

The purpose of this section is to record environmental permit condition breaches arising from the incorrect or late reporting of emission monitoring data. Condition 4.2.3 of the environmental permit states:

Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by Natural Resources Wales, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in Schedule 4(b) Table S4.1;*
- (b) for the reporting periods specified in Schedule 4(b) Table S4.1 and using the forms specified in Schedule 4(b) Table S4.4; and*
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.*

Table S4.1 of Schedule 4(b) to the environmental permit is partially reproduced below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air parameters as required by condition 3.5.1	A1, A2, A3	Every 6 months	1 January
Emissions to sewer parameters as required by condition 3.5.1	S1	Every 6 months	1 January

Table S4.4 of Schedule 4(b) to the environmental permit is partially reproduced below.

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
Sewer	Form sewer 1 or other form as agreed in writing by Natural Resources Wales	17/08/2022
Air	Form Air 1 or other form as agreed in writing by Natural Resources Wales	17/08/2022

Compliance Assessment

Point Source Emissions to Air – A1, A2 & A3

1. The reporting form for emissions to air (i.e. form *Air 1*) was submitted by the operator via email on 18 November 2025.
2. The reporting form submission was made inside the 28 day reporting window which represents compliance with the environmental permit.
3. The reporting form submitted is for the reporting period specified in Schedule 4(b) Table S4.1 which represents compliance with the environmental permit.
4. Emissions to air data was submitted using the form specified in Schedule 4(b) Table 4.4 which represents compliance with the environmental permit.
5. The reporting form submitted included results for all parameters and emission points specified in Schedule 4(b) Table S4.1 which represents compliance with the environmental permit.

Compliance Classification Scheme (CCS): *There are no occurrences of non-compliance with permit condition 4.2.3.*

Action: *No action required*

Point Source Emissions to Sewer – S1

1. The reporting forms for emissions to sewer (i.e., *Sewer 1*) were submitted by the operator via email on 10 October 2025 (Q3 monitoring data) and 05 February 2026 (Q4 monitoring data).

Note – the reporting frequency stated in schedule 4(b) table S4,1 for emissions to sewer is every 6 months, so the submission of quarterly monitoring data by Tradebe is not necessary.

2. The reporting form for Q4 was not submitted inside the 28-day reporting window which represents non-compliance with the environmental permit.
3. The reporting forms submitted are for the reporting period specified in Schedule 4(b) Table S4.1 which represents compliance with the environmental permit.
4. Emissions to sewer data was submitted using the form specified in Schedule 4(b) Table 4.4 which represents compliance with the environmental permit.
5. The reporting form submitted included results for all parameters and emission points specified in Schedule 4(b) Table S4.1 which represents compliance with the environmental permit.

Compliance Classification Scheme (CCS): *As a result of this non-compliance with permit condition 4.2.3, a CCS score [C4] has been recorded against compliance sub-criteria IR4B – Information – Reporting.*

Justification: *A C4 score has been levied as it is reasonably foreseeable that the failure to submit monitoring return data within the 28 day reporting window will not have any impact on the environment.*

Action: *The operator shall submit future reporting forms within the 28-day reporting window as required by permit condition 4.2.3.*

Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

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Emissions and Monitoring (IR3A)

The purpose of this section is to record environmental permit condition breaches arising from the exceedance of permitted emission limits. Condition 3.1.2 of the environmental permit states:

The limits given in schedule 3 shall not be exceeded.

Table S3.1 of Schedule 3(b) (Point source emissions to air – emission limits and monitoring requirements) to the environmental permit is partially reproduced below.

Table S3.1 Point source emissions to air – emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency 1,2	Monitoring standard or method
A1	Process building stack from wet scrubber abatement system	Hydrogen Chloride (HCL) ¹	5mg/Nm ³	None set	Once every 6 months	EN 1911
		Total Volatile Organic Compounds (TVOC) ¹	20mg/Nm ³	None set	Once every 6 months	EN 12619
		Ammonia (NH ₃) ¹	No limit set	None	Once every 6 months	No EN standard available

¹ Monitoring only applies when the substance concerned is identified as relevant in the waste gas inventory (as per IC14)

Table S3.3 of Schedule 3(b) (Point source emissions to sewer – emission limits and monitoring requirements) to the environmental permit is partially reproduced below.

Table S3.3 Point source emissions to sewer – emission limits and monitoring requirements

Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency 1,2	Monitoring standard or method
S1	Adsorbable Organically Bound Halogens (AOX)	Treatment plant within process building	1mg/l	None set	Once every day	EN ISO 9562

¹ In the case of batch discharge less frequent than the minimum monitoring frequency, monitoring is carried out once per batch.

² In the case of an indirect discharge to a receiving water body, the monitoring frequency may be reduced if the downstream waste water treatment plant abates the pollutants identified.

Note – Compliance Assessment Report CAR_NRW0044532, issued on 13 June 2024, reduces the monitoring frequency requirements for emissions to sewer compared to those stated in schedule 3(b) table S3.3 (e.g., monthly monitoring instead of daily for AOX, HOI and Hg). CAR_NRW0044532 also introduces a 5mg/l action limit for AOX, whereby a schedule 5 notification only needs to be submitted by the operator when AOX emissions exceed the 5mg/l action limit. This 5mg/l action limit will be used when evaluating the AOX emissions monitoring data presented in this report (i.e., for Q3 and Q4 2025). However, subsequent Compliance Assessment Report CAR_NRW0050600, states that from the date of issue the permitted emission limit for AOX will revert to 1mg/l, inline with Waste Treatment BREF requirements and Table S3.3 of Schedule 3(b) to the environmental permit. The operator will also be required to submit a schedule 5 Part A (b) notification to NRW if this 1mg/l AOX limit is exceeded, as prescribed in permit condition 4.3.2. With regards to monitoring

frequency, CAR_NRW0050600 also requests the operator to carry out a 4-week assessment to determine the scale and variability of AOX concentrations in effluent discharged from emissions point S1. Once this has been completed and the results shared, NRW will advise the operator on future monitoring and reporting requirements for AOX emissions.

Compliance Assessment

Point Source Emissions to Air – A1, A2 & A3

Emissions monitoring data submitted by the operator on 18 November 2025 demonstrates that all measured parameter results were within the permitted emission limits which represents compliance with the environmental permit.

Compliance Classification Scheme (CCS): *There are no occurrences of non-compliance with permit condition 3.1.2*

Action: *No action required*

Point Source Emissions to Sewer – S1

Permitted Limit Exceedance – AOX (Q3)

Emissions monitoring data submitted on 10 October 2025 demonstrates that the measured AOX result at S1 emission point on 14 July 2025 was 16.7. This is an exceedance of the permitted emission limit and represents non-compliance with the environmental permit.

Compliance Classification Scheme (CCS): *As a result of this non-compliance with permit condition 3.1.2, a CCS score [C3] has been recorded against compliance sub-criteria IR3A (1) – Emissions & Monitoring – Emissions to Water.*

Justification: *A C3 score has been levied as it is reasonably foreseeable that an exceedance of the permitted emission limit for AOX will have a minor impact or effect on the environment.*

Action: *See root cause – section 4.2.3.*

Permitted Limit Exceedance – AOX (Q4)

Emissions monitoring data submitted on 05 February 2026 demonstrates that the measured AOX result at S1 emission point on 11 November 2025 was 10.3. This is an exceedance of the permitted emission limit and represents non-compliance with the environmental permit.

Compliance Classification Scheme (CCS): *As a result of this non-compliance with permit condition 3.1.2, a CCS score [C3] has been recorded against compliance sub-criteria IR3A (1) – Emissions & Monitoring – Emissions to Water.*

Justification: *A C3 score has been levied as it is reasonably foreseeable that an exceedance of the permitted emission limit for AOX will have a minor impact or effect on the environment.*

Action: *See root cause – section 4.2.3.*

Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required

Root Cause of Permitted Limit Exceedances

Condition 1.1.1 of the environmental permit states:

The operator shall manage and operate the activities:

(a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and

(b) using sufficient competent persons and resources

In 2025, the operator reported 6 exceedances of the 5mg/l AOX action limit, with the highest result being 16.7mg/l on 14 July, demonstrating that existing operational and management controls for minimising AOX pollution are ineffective. Details of these exceedances are shown below:

Monitor Date	Detection Date	Monitor to Detection (days)	AOX Concentration (mg/l)
13/04/25	25/06/25	73	8.43
10/06/25	28/07/25	48	7.95
14/07/25	28/07/25	14	16.7
09/09/25	31/12/25	113	6.28
14/10/25	31/12/25	78	7.06
11/11/25	31/12/25	50	10.3

Note – NRW are concerned with the delay between monitor date and detection date but are aware of the fact that samples are being sent to the Czech Republic for AOX analysis. As previously stated in Compliance Assessment Report CAR_NRW0050600, NRW recommends the operator to continue searching for a UK based laboratory with UKAS accreditation for EN ISO 9562, with the aim of achieving daily AOX monitoring as required by Table S3.3 of Schedule 3(b) to the environmental permit.

Compliance Classification Scheme (CCS): As a result of this non-compliance with permit condition 1.1.1, a CCS score [C3] has been recorded against compliance sub-criteria IR1A – Management – General Management.

Justification: A C3 score has been levied as it is reasonably foreseeable that an ineffective written management system will facilitate AOX pollution, which will impact or have a minor effect on the environment.

Action: The operator shall submit, for approval, a voluntary compliance plan outlining the actions to be taken to prevent further AOX limit exceedances. This plan should also include:

- Details of the AOX abatement measures to be instated to achieve BAT, as set out in ‘Best Available Techniques (BAT) Reference Document for Waste Treatment’ (the BRef), including an explanation of how the chosen measure(s) achieve BAT (please refer to specific BRef BAT Conclusion numbers as necessary).
- A step-by-step description of actions to be undertaken to achieve BAT and return to permit compliance.
- Timescales for each action, including start and end dates.
- Details of which steps have already started or been completed.
- Details of interim mitigation measures to manage ongoing risk of ongoing AOX limit exceedance.
- An installation & commission plan for any new plant requirements.
- A review of the written management system with consideration to new procedures and/or plant required to control AOX emissions.

Notification (IR4C)

The purpose of this section is to record environmental permit condition breaches arising from the late notification of any condition breach to NRW. Condition 4.3.2 (b)(i) of the environmental permit states:

(b) in the event of a breach of any permit condition the operator must immediately
(i) inform Natural Resources Wales

Furthermore, condition 4.3.3 of the environmental permit states:

Any information provided under condition 4.3.2(a)(i) or 4.3.2(b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

Note – a schedule 5 Part A (b) should be submitted to NRW within 24 hours of detecting a permit condition breach.

Compliance Assessment**Point Source Emissions to Air – A1, A2 & A3**

Not applicable – the operator has not exceeded any emission limit values to air.

Compliance Classification Scheme: *There are no occurrences of non-compliance with permit conditions 4.3.2(b)(i) and 4.3.3.*

Action: *No action required*

Point Source Emissions to Sewer – S1**Permitted Limit Exceedance – AOX (Q3)**

1. The operator notified NRW of an exceedance of the permitted emission limit for AOX on 10 October 2025.
2. The exceedance of the permitted emission limit was detected on 28 July 2025.
3. The operator failed to notify NRW of the exceedance within 24 hours of detection which represents non-compliance with the environmental permit.

Compliance Classification Scheme: *As a result of this non-compliance with permit conditions 4.3.2(b)(i) and 4.3.3, a CCS score [C4] has been recorded against compliance sub-criteria IR4C – Information – Notification.*

Justification: *A C4 score has been levied as it is reasonably foreseeable that the late submission of a schedule 5 part A (b) notification will not have any impact on the environment.*

Action: *The operator shall submit future schedule 5 Part A (b) notifications to NRW within 24 hours of detecting a permitted limit exceedance.*

Permitted Limit Exceedance – AOX (Q4)

1. The operator notified NRW of an exceedance of the permitted emission limit for AOX on 07 January 2025.
2. The exceedance of the permitted emission limit was detected on 31 December 2025.
3. The operator failed to notify NRW of the exceedance within 24 hours of detection which represents non-compliance with the environmental permit.

Compliance Classification Scheme: *As a result of this non-compliance with permit conditions 4.3.2(b)(i) and 4.3.3, a CCS score [C4] has been recorded against compliance sub-criteria IR4C – Information – Notification.*

Justification: *A C4 score has been levied as it is reasonably foreseeable that the late submission of a schedule 5 part A (b) notification will not have any impact on the environment.*

Action: *The operator shall submit future schedule 5 Part A (b) notifications to NRW within 24 hours of detecting a permitted limit exceedance.*

Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required

[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.