

Compliance Assessment Report CAR_NRW0050600

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: Site Inspection,

Reason: Routine.

On: 18/12/2025 between 10:30 and 13:00.

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
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Action only (X)	
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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
IR3A(1)	In the event that the autosampler unit cannot be repaired, the operator shall: <ul style="list-style-type: none"> - Provide evidence to demonstrate that effluent is appropriately mixed and homogenous prior to sampling and discharge. 	30/04/2026

Criteria	Action needed	Complete by
	In the event that the autosampler unit is repaired and operational, the operator shall: <ul style="list-style-type: none"> - Provide evidence to demonstrate that sampling is aligned to BAT requirements. - Implement an inspection and preventative maintenance programme for the autosampler unit. 	
IR3A(1)	In order to demonstrate the daily scale and variability of AOX concentrations, the operator shall: <ul style="list-style-type: none"> - Conduct a 4-week assessment as soon as practicable, during which daily samples are collected and analysed for AOX using the on-site laboratory. - Investigate the accuracy of onsite AOX analysis compared to an external laboratory with UKAS accreditation for EN ISO 9562. - Following completion of the above 4-week assessment and AOX analysis accuracy investigation, submit all monitoring data, comparison results and conclusions to NRW. NRW will review the findings and determine the future monitoring and reporting requirements for AOX. 	30/04/2026

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

Assessment Details

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (hereafter NRW) site visit to Tradebe Gwent Ltd, Gwent Waste Management Centre, Newport (hereafter 'the operator') on 18 December 2025.

The reason for this visit was for the newly appointed Industry Regulation Officer, who is responsible for regulating this site, to become familiar with on-site operations & activities and to meet the Tradebe Gwent Ltd management team. The visit also provided an opportunity to discuss recent AOX (i.e., adsorbable organic halogens) limit exceedances and future monitoring requirements.

It should be noted that the previous officer responsible for regulating this site retired in late 2024 and due to NRW resource limitations, no direct regulation of this operation was planned in 2025 until a designated site officer was appointed. This was explained to the operator during the last site inspection on 11 June 2024. Details of this are recorded in Compliance Assessment Report CAR_NRW0044532.

A full site tour was provided by the operator covering the transfer facility and treatment plant. The operator also explained pre-acceptance checks and the analysis carried out on the wastes received to determine the storage,

treatment, recovery or disposal activity within the installation.

Attendees

Natural Resources Wales

David Thomson [Senior Officer, Industry Regulation]
 Guy Baskerville [Lead Specialist, Industry Regulation]

Tradebe Gwent Limited

[Redacted] [Site Manager]
 [Redacted] [Laboratory Manager]
 [Redacted] [Transfer Facility Manager]

Emissions and monitoring (IR3A)

Regulatory Context

Environmental permit condition 3.1.2 states:

The limits given in schedule 3 shall not be exceeded.

Table S3.3 of Schedule 3(b) to the environmental permit is partially reproduced below.

Table S3.3 Point source emissions to air – 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 wastewater treatment plant abates the pollutants identified.

Amended AOX Monitoring and Reporting Requirements

Compliance Assessment Report (CAR) *CAR_NRW0044532*, issued on 13 June 2024 by the previous regulatory officer, amends the monitoring frequency for AOX from daily to monthly, with Schedule 5 notifications only required from the operator when AOX levels exceed 5 mg/l. The rationale for these changes is not explained or supported by historical data as daily AOX monitoring has never been carried out onsite by the operator.

A table containing revised monitoring and reporting requirements is presented in *CAR_NRW0044532* and has been partially reproduced below.

Parameter	Sampling	Analysis	Emission Limit Value (ELV)
AOX	Each batch into composite	External, monthly	1mg/l, action limit 5mg/l

Compliance Assessment Report *CAR_NRW0044532* also sets the below action for the operator to complete by 01 November 2024, however, no findings were submitted before the deadline date:

'Investigate causes of high AOX concentrations in final effluent. Report findings to NRW by due date.'

On 16 September 2025, in response to an action update request from NRW, the operator responded via email:

'This action was to carry out a desktop exercise to see if we could determine the type of AOX present in our process and from this determine whether the type of AOX was harmful to the environment. This proved challenging and the findings were inconclusive'.

Throughout 2025, the operator exceeded the 5mg/l AOX action limit on six occasions, demonstrating that AOX emissions are not under effective operational control. Further action is required from the operator to identify source(s) of high AOX and implement appropriate controls to prevent future exceedances. Details of the six AOX limit exceedances fall outside the scope of this report but are addressed in Compliance Assessment Reports CAR_NRW0049771 and CAR_NRW0050601.

Site Visit Discussion

During discussions on 18 December 2025, the operator explained to NRW that a single effluent spot sample is collected each month and sent to a UKAS-accredited laboratory in the Czech Republic for AOX analysis. The operator stated that no UK laboratory with UKAS accreditation for EN ISO 9562 (i.e., Water quality – determination of adsorbable organic halogens (AOX)) has been identified. The operator further reported that sending samples to the Czech Republic is costly and has a long turn-around duration (i.e., monitor-to-detection) which they believe is contributing to the high AOX levels measured.

Recommendation

- *NRW recommends the operator to continue searching for a UK based laboratory with UKAS accreditation for EN ISO 9562, with the aim of implementing daily AOX monitoring as required by Table S3.3 of Schedule 3(b) to the environmental permit.*
- *Carry out an onsite assessment to quantify changes in AOX concentrations over time. Consider timeframes comparable to those when sending samples to the Czech Republic for AOX analysis.*

Note – Although there is no reference period specified in Table S3.3 of Schedule 3(b) to the environmental permit, the Waste Treatment BREF (page 716) states that *'unless stated otherwise, averaging periods associated with the BAT-AELs refer to either of the following two cases:*

- *in the case of continuous discharge, daily average values, i.e. 24-hour flow-proportional composite samples;*
- *in the case of batch discharge, average values over the release duration taken as flow proportional composite samples, or, provided that the effluent is appropriately mixed and homogeneous, a spot sample taken before discharge.*

Time-proportional composite samples can be used provided that sufficient flow stability is demonstrated. All BAT-AELs for emissions to water apply at the point where the emission leaves the installation.

The operator informed NRW that although effluent spot samples are currently collected monthly for AOX monitoring, an autosampler unit capable of collecting composite samples is installed onsite, however at the time of the visit it was not operational. The operator indicated that repairs will take place in January 2026.

Action

In the event that the autosampler unit cannot be repaired, the operator shall:

- *Provide evidence to demonstrate that effluent is appropriately mixed and homogenous prior to sampling and discharge.*

In the event that the autosampler unit is repaired and operational, the operator shall:

- *Provide evidence to demonstrate that sampling is aligned to BAT requirements.*
- *Instate an inspection and preventative maintenance programme for the autosampler unit.*

During the site tour, NRW officers were shown the on-site laboratory which contained equipment capable of undertaking AOX analysis (and staff were trained to use it), however, the facility does not hold UKAS-accreditation for EN ISO 9562. The operator reported that on-site AOX analysis is resource-intensive and that

staffing constraints would pose a challenge to daily monitoring of AOX as required by the environmental permit. As daily AOX monitoring has never been undertaken, NRW considers it necessary for the operator to demonstrate the scale and variability of daily AOX concentration in the effluent discharged from emission point S1.

Action

In order to demonstrate the daily scale and variability of AOX concentrations, the operator shall:

- *Conduct a 4-week assessment as soon as practicable, during which daily samples are collected and analysed for AOX using the on-site laboratory.*
- *Investigate the accuracy of onsite AOX analysis compared to an external laboratory with UKAS accreditation for EN ISO 9562.*
- *Following completion of the above 4-week assessment and AOX analysis accuracy investigation, submit all monitoring data, comparison results and conclusions to NRW. NRW will review the findings and determine the future monitoring and reporting requirements for AOX.*

Information gained during this assessment may also provide the operator with an insight into potential source(s) of high AOX as well as being useful when identifying appropriate abatement technology.

Finally, from the date this Compliance Assessment Report is issued, 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 need to submit a schedule 5 notification when this 1mg/l limit is exceeded as prescribed in permit condition 4.3.2 which states:

Any information provided under condition 4.3.1(a)(i) or 4.3.1(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 – Schedule 5 Part A(b) of the environmental permit requires NRW be notified within **24 hours of detection** of a permit condition breach.

[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.