

Compliance Assessment Report CAR_NRW0050891

Permit being assessed: CP3735PB.

For: Nantycaws Landfill EPR/CP3735PB, **held by:** CWM Environmental Ltd

At: Nantycaws Landfill Site Llanddarog Road , Nantycaws, Carmarthen, Carmarthenshire, 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: SHEQ and Landfill Compliance Manager, CWM Environmental Ltd, on 27/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Action only (X)	
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?

Criteria	Action needed	Complete by
IR3A(2)	CWM Environmental Ltd is required to provide NRW with an explanation as to why the flare was not operating at the required temperature during the emissions testing carried out on the 4th of June 2025.	20/03/2026

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Introduction

This Compliance Assessment Report (CAR) is regarding the assessment of the 2025 annual submissions relating to the Nantycaws Phase 2 Landfill Complex, which were submitted by CWM Environmental (the Operator).

Scope

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

- Nantycaws 2025 Annual Report
- 402.065899.00001_Nantycaws Surface Emission Survey 2025_v1.0
- Copy of Nantycaws Annual engine emissions 2025 (003)
- Copy of Nantycaws Annual Flare Emissions 2025 v2
- CWM_12-2025_A
- CWM_12-2025_r1
- CWM_LF_volume_change_Jan_2025-Dec_2025
- LSW 250605 Infinis Nant Y Caws LFG Report version 1
- Email Submissions.

2025 Annual Submission Assessment

The Operator submitted the *Nantycaws 2025 Annual Report* on the 10th of February 2026, this fulfilled the requirements outlined by permit condition 4.2.1a. NRW has not compliance assessed this report in its entirety. Whilst the report was submitted outside the timeframe (by 31st of January) specified by permit condition 4.2.1, this was pre-agreed beforehand with NRW and consequently is not considered to be a non-compliance in this instance.

The Operator provided all other reports and email submissions on the 27th of January 2026. This was within the timeframe required by permit condition 4.2.1. The submissions detailed all informative requirements which were outlined by permit condition 4.2.1b to 4.2.1i.

Trace Gas Analysis

The Operator submitted the Trace Gas Analysis Report to NRW on the 27th of January 2026. This is in accordance with permit condition 3.6.1d which requires monitoring to be undertaken annually.

Flare Emissions

The Operator submitted monitoring data from flare emissions testing which was undertaken on the 4th of June 2025.

It is noted that the hourly average emissions for NO_x, CO and TVOC were all within the permitted compliance levels. Monitoring for SO₂ was also undertaken, however there is no compliance level set for this parameter.

It was noted that NMVOCs were not monitored on this occasion; however, as the flare was operational for less than 10% of the time in 2025, emissions testing was not required in accordance with the footnote to *Table S4.2* of the permit.

It is noted that the operating temperature of the flare during emissions testing was 680°C, which is below the permitted operating temperature of >1000°C. The Operator has not provided any explanation for the reduced flare temperature. This matter has not been compliance assessed at this stage, pending further information requested from the Operator below. Depending on the outcome of this, the issue may be the subject of future CAR forms and Site Inspections.

Action:

CWM Environmental Ltd is required to provide NRW with an explanation as to why the flare was not operating at the required temperature during the emissions testing carried out on the 4th of June 2025.

Surface Emissions

The Operator submitted the report detailing the Surface Emissions survey on the 27th of January 2026. This was submitted in accordance with permit condition 3.6.1d which requires monitoring to be undertaken annually.

It is noted within the document that 15 losses of landfill gas were identified from the landfill cap and its associated infrastructure. The report concludes that these were remediated, and subsequently retested to ensure compliance. NRW has not compliance assessed this report at this time.

Please note: This CAR report and assessment was undertaken on 27th of February 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.