

## Compliance Assessment Report CAR\_NRW0050732

**Permit being assessed:** DP3137EG.

**For:** Margam Green Energy Plant, **held by:** Margam Green Energy Ltd

**At:** Land off Longlands Lane, Margam, Port Talbot, Neath Port Talbot, SA13 2NR.

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

**Reason:** Routine.

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

**Parts of permit assessed:** See details.

**NRW Lead Officer:** Michael Launder.

**Report sent to:** General Manager, Margam Green Energy 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
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
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IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	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
3	12

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)	Operator to provide NRW with a summary of remedial actions taken to prevent a recurrence of the conditions that led to the exceedances.	Already completed
IR3A(2)	Operator to provide to NRW a summary of remedial actions taken to prevent a recurrence of the conditions that led to the exceedances.	Already completed
IR3A(2)	Operator to provide to NRW a summary of remedial actions taken to prevent a recurrence of the conditions that led to the exceedances.	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.

**You are non-compliant with your permit.**

**At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.**

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

### Introduction

This Compliance Assessment Report is a review of the 2025 Q3, Q4 and annual returns for Margam Green Energy Ltd.

### Q3 July to September 2025

The Q3 submission comprised the following reporting forms:

- Air 1 - 16 for July, August and September (CEMS)
- Water 1
- Energy 1
- Performance 1
- Residues 1

The submission included all the results for quarterly parameters required over this period.

The reported emissions were within the emission limits specified in the permit for the monitoring period, with the exception of the Schedule 5 reports for exceedances of emission limits outlined below.

A Schedule 5 notification submitted to NRW on 11 July 2025 reported two consecutive breaches of the half-hourly CO limit at A1 on 10 July 2025. The reported values were 831 mg/Nm<sup>3</sup> and 559 mg/Nm<sup>3</sup> against the permit limit of 150 mg/Nm<sup>3</sup>.

A Schedule 5 notification submitted to NRW on 21 July 2025 gives a half hourly CO result for 20 July 2025 at A1 as 1118 mg/Nm<sup>3</sup> against the permit limit of 150 mg/Nm<sup>3</sup>. A further exceedance of the half-hourly TOC limit of 30 mg/Nm<sup>3</sup> was reported with a measured value of 30.5 mg/Nm<sup>3</sup>.

A further two breaches were reported for 19 August 2025. The first reported half-hourly values of 1554 mg/Nm<sup>3</sup> for CO and 180 mg/Nm<sup>3</sup> for TOC at 3:30AM and the second reported half-hourly values of 775 mg/Nm<sup>3</sup> and 49 mg/Nm<sup>3</sup>. These were against the respective limits of 150 mg/Nm<sup>3</sup> for CO and 30 mg/Nm<sup>3</sup> for TOC.

**Compliance: The above reported results are in exceedance of the emission limits set for A1 in the permit and in breach of condition 3.1.2. Non-compliance categories of C3 against criteria IR3A(2) Emissions to air have been allocated to each of these breaches over the Q3 July to September reporting period. The breaches have been consolidated into one breach for each of CO and TOC for the quarter.**

**Action: Operator to provide to NRW a summary of remedial actions taken to prevent a recurrence of the conditions that led to the exceedances. COMPLETED This action has been addressed by submission of Part B notifications and the Annual Performance Report, which outlines measures taken.**

#### Q4 October to December 2025

The Q4 submission comprised the following reporting forms:

- Air 1 - 16 for October, November and December (CEMS)
- Water 1
- Energy 1
- Performance 1
- Residues 1

The submission included all the results for quarterly parameters required over this period.

The reported emissions were within the emission limits specified in the permit for the monitoring period, with the exception of the Schedule 5 reports for exceedances of emission limits outlined below.

A Schedule 5 notification submitted to NRW on 1 December 2025 reported a half-hourly CO result of 273.8 mg/Nm<sup>3</sup> at A1 on 28 November 2025. This is in exceedance of the permit limit of 150 mg/Nm<sup>3</sup>.

**Compliance: The above reported result is in exceedance of the emission limits set for A1 in the permit and in breach of condition 3.1.2. A non-compliance category of C3 against criteria IR3A (2) Emissions to air has been allocated to this breach for the Q4 October to December reporting period.**

**Action: Operator to provide to NRW a summary of remedial actions taken to prevent a recurrence of the conditions that led to the exceedances. COMPLETED This action has been addressed by submission of Part B notifications and the Annual Performance Report, which outlines measures taken.**

### Annual

The annual submission for 2025 comprised the following:

- Air 17 for 2025 (periodic sampling)
- Annual Form Performance 1 for 2025
- Annual Performance Report for 2025
- CEMS Annual Summary

The submission included all the results for annual parameters required over this period. The reported emissions were within the emission limits specified in the permit for the monitoring period.

### Waste

The operator has submitted quarterly reports of the waste volumes received and used as a fuel throughout the year.

The operator reports receipt of waste coded only as *19 12 07 (Wood other than that mentioned in 19 12 06)* throughout the year. This is described as Grade C Recycled Woodchip and the only recovery code used is *R01 Incineration of waste for use principally as a fuel or other means to generate energy*.

The waste code and recovery code are consistent with those allowed by the permit and the volumes received (presented in the Annual Form Performance 1) are within the limit set by the permit.

Note: This CAR report and assessment was undertaken on 23 February 2026. However to ensure that the CCS score is attributed to the correct financial year (for billing) the date on CARS system has been altered to 31 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](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.