

Compliance Assessment Report CAR_NRW0051053

Permit being assessed: BU2489IT.

For: Baglan Paper Mill, **held by:** Sofidel UK Limited

At: Brunel Way , Baglan Energy Park, Neath, Neath Port Talbot, SA11 2FP.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2025.

Parts of permit assessed: 2025 Annual Monitoring Returns.

NRW Lead Officer: Daren Pike.

Report sent to: Kerry Mackinnon, Environment Manager, on 16/03/2026.

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	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	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

Introduction

This Compliance Assessment Report (CAR) has been issued in response to the submission of the 2025 annual monitoring returns by Sofidel UK Ltd (the operator) for activities at Brunel Way, Baglan Energy Park, Briton Ferry SA11 2HZ under permit EPRBU2489IT.

Annual Reporting Requirements as required by condition 4.2.2

The Annual Report was submitted on 30 January 2026 in compliance with the permit requirements.

Point Source Emission to Air Parameters (Air 1 Form) as required by condition 4.2.2

The annual submission included results for all parameters required over this period and are in compliance with the limits set out in the permit.

Permit Number: EPR/BU2489IT Operator: Sofidel UK Limited
Facility: Baglan Paper Mill Form Number: Air 1 13/08/2025

Reporting of emissions to air for the period from 01/01/2026 to 30/06/2026

Emission Point	Substance / Parameter	Emission/ Limit Value	Reference Period	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Uncertainty [4]
A2	Particulates	10mg/m ³	Spot Sample	0.62	BS EN 13284 -1	21/01/2026 09:45-10:39	0.08
A3	Particulates	10mg/m ³	Spot Sample	0.25	BS EN 13284-1	21/01/2026 11:15-11:53	0.09
A5	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	200mg/m ³	Periodic			Completed 04/11/2025- Report submitted- 20/11/2025	
	Carbon monoxide	No limit set	Periodic			Completed 04/11/2025- Report submitted- 20/11/2025	
A6	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	300mg/m ³	Periodic	127	MCERTS BS EN 14792	26/01/2026 11:37-12:43	1.9
	Dust	30mg/m ³	Periodic	2.09	MCERTS BS EN 13284-1	26/01/2026 11:37-12:43	0.12
	Carbon monoxide	No limit set	Periodic	16.7	MCERTS BS EN 15058	26/01/2026 11:37-12:43	0.2

[1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values.

[2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with Natural Resources Wales is used, then the appropriate identifier is given. In other cases the principal technique is stated, for example gas chromatography.

[3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.

[4] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.



Signed

4th February 2026

Date

(Authorised to sign as representative of Operator)

Point Source Emission to Water Parameters (Water 1 Form) as required by condition 4.2.3

The annual submission included results for all parameters required over this period and are in compliance with the limits set out in the permit.

Permit Number: EPR/BU2489IT

Operator:

Sofidel UK Limited

Facility: Baglan Paper Mill

Form Number:

Water 1 30/09/2018

Reporting of emissions to water (other than to sewer) and land for the period from01/01/2025..... to ...31/12/2025.....

Emission Point	Substance / Parameter	Emission Limit Value ^[1]	Reference Period	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Uncertainty ^{[4] [5]}
W1	Biological Oxygen Demand (BOD)	25 mg/l	24-hour flow proportional composite sample	37mg/l	GLPMETH030-005 by titrimetry	18/11/2025	
W1	Chemical Oxygen Demand (COD) ^[7]	1.5 kg/T	Annually	0.5823 kg/T	GLPMETH030-008 by digestion with acidic potassium dichromate and colorimetry		
W1	Total Suspended Solids	0.35 kg/T	Annually	0.0773 kg/T	GLPMETH030-003 by gravimetry		
W1	Total Mercury and its compounds	--	24-hour flow proportional composite sample	<0.0002 µg/l	Method ALS WAS013 CVAFS	13/03/2025 19/06/2025 23/09/2025 12/11/2025	
W1	Total Cadmium and its compounds	--	24-hour flow proportional composite sample	<0.0005 µg/l	Method ALS WAS 076 ICP-MS	13/03/2025 19/06/2025 23/09/2025 12/11/2025	
W1	pH	9	Instantaneous	7.81	Standard Sensor	09/01/2025	
W1	pH	6	Instantaneous	6.16	Standard Sensor	06/12/2025	
W1	Priority Hazardous Substances Screen ^[8]	--	24-hour flow proportional composite sample	Please see report Priority Hazardous Substances Submission	GCMS analysis at UKAS accredited laboratory	12/11/2025 07:30	


Other Report Tables - KPIs

Permit Number: EPR/BU2489IT Operator: Intertissue Ltd
 Facility: Intertissue Neath Form Number: Performance 1 30/09/18

Reporting of other performance indicators for the period01/01/2025..... to31/12/2025.....

Parameter	Units
BOD/ADT	0.0239 kg/ADT
Suspended solids/ADT	0.0773 kg/ADT
Total Nitrogen/ADT	0.0198 kg/ADT
Total Phosphorous/ADT	0.0055 kg/ADT
NOx	0.00026 Tonnes/ADT
CO ₂	0.2780 Tonnes/ADT
AOX	0.0003 kg/ADT
Total Energy Used	60,268 MWh
Effluent discharged	44,693 m ³ Quarter 1 34,881 m ³ Quarter 2 34,998 m ³ Quarter 3 42,160 m ³ Quarter 4
Water usage	295,570 m ³

Operator's comments :
 Net annual production used for calculations based on BREF definition
 Total Energy Used- All site Energy
 Water Usage- Papermill Water Only

Signed 
 (Authorised to sign as representative of Operator)

Date 30th January 2026

Priority Hazardous Substances

Permit Number: EPR/BU2489IT/V009 Operator: Sofidel UK Ltd
 Facility: Sofidel UK Neath Form Number: Priority Hazardous Substances

Reporting of emissions to water (other than sewer) for the period from 01/01/2025 to 31/12/2025

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Uncertainty ^[4]
W1	Tributyl Tin	No limit set	24-hour flow proportional sample	<0.2 ug/l	ALS GEO24 GCMS	12/11/2025 07:30	
W1	Anthracene	No limit set	24-hour flow proportional sample	<0.2 ug/l	ALS GEO81 GCMS	12/11/2025 07:30	
W1	alpha-Endosulphan	No limit set	24-hour flow proportional sample	<0.007 ug/l	ALS GEO47 GCMS	12/11/2025 07:30	
W1	beta-Endosulphan	No limit set	24-hour flow proportional sample	<0.008 ug/l	ALS GEO47 GCMS	12/11/2025 07:30	
W1	Brominated diphenyl ether [5]	No limit set	24-hour flow proportional sample	NO RESULT			
W1	C10-C13 Chloroalkanes	No limit set	24-hour flow proportional sample	<0.4 ug/l	W-CLAGMS01 CSN EN ISO 12010	12/11/2025 07:30	
W1	Hexachlorobenzene	No limit set	24-hour flow proportional sample	<0.005 ug/l	ALS GEO47 GCMS	12/11/2025 07:30	
W1	Hexachlorobutadiene	No limit set	24-hour flow proportional sample	<1.00 ug/l	UKAS ISO 17025	12/11/2025 07:30	
W1	Hexachloro-cyclohexane	No limit set	24-hour flow proportional sample	<0.006 ug/l	ALS GEO47 GCMS	12/11/2025 07:30	
W1	Nonylphenol	No limit set	24-hour flow proportional sample	<0.050 ug/l	ALS W-AEOGMS01 GCMS	12/11/2025 07:30	
W1	Pentachlorobenzene	No limit set	24-hour flow proportional sample	<0.011 ug/l	UKAS ISO 17025	12/11/2025 07:30	
W1	Polycyclic aromatic Hydrocarbons (PAHs)	No limit set	24-hour flow proportional sample	<0.2 ug/l	ALS GEO81 GCMS	12/11/2025 07:30	

- [1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values.
- [2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with the Environment Agency is used, then the appropriate identifier is given. In other cases the principal technique is stated, for example gas chromatography.
- [3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.
- [4] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.
- [5] No result for BDE due to issue with laboratory. Discussed with Regulatory Officer 29th January 2026.

K. Mackin
 Signed Date: 30th January 2026
 (Authorised to sign as representative of Operator)

Energy Usage

Permit Number: EPR/BU2489IT Operator: Sofidel UK Limited
 Facility: Baglan Paper Mill Form Number: Energy1 30/09/2018

Reporting of Energy Usage for the year 01/01/2025 to 31/12/2025

Energy Source	Energy Usage		Specific Usage (MWh/unit output)
	Quantity	Primary Energy (MWh)	
Electricity *	60,267.9 MWh	144,643	2.23 MWh/T
Natural Gas	99,813.6 MWh	99,813.6	1.54 MWh/T
Gas Oil	8.53 tonnes	107.28	0.002 MWh/T
Recovered Fuel Oil	0 tonnes	0	0
TOTAL	-		

* Conversion factor for delivered electricity to primary energy = 2.4

Operator's comments :
 Net annual production used for calculations based on BREF definition.
 Total site energy used to calculate specific usage (MWh/T) against paper mill production.



Signed
 (Authorised to sign as representative of Operator)

30th January 2026
 Date.....

Resource Efficiency

Permit Number: EPR/BU2489IT Operator: Intertissue Ltd
 Facility: Intertissue Neath Form Number: Performance 2 30/09/18

Reporting of Resource efficiency performance metrics for the period01/01/2025..... to31/12/2025.....

Parameter	Units		Methodology
	Total m ³ /p.a	m ³ /t	
Water			Measured or Calculated
Water inputs to the mill			
Surface water (actual not licensed) eg: river water	-	-	
Groundwater (actual not licensed) eg: borehole water	-	-	-
Mains water (only report if used in the paper or pulp manufacturing process)	226,720	3.49	Measured – meter
Other water (eg, if rainwater harvesting is practised)	68,850	1.06	Measured – meter - rainwater
Water used in manufacturing			
Cooling water (once through or hybrid systems)			
Process water	272,349	4.19	Calculated based on meter readings
Other water used in manufacturing	23,221	0.36	Boiler water -Measured - meter
Other inputs of water/moisture			
Pulp or other fibre or wood at X% moisture content ²			
Waste paper for recycling at X% moisture content ²			
Water outputs			
Waste Water discharged to surface waters NB; this figure should be the one used to report water usage per tonne as per BREF benchmarks under BATC No.5 and should exclude site drainage and cooling water	156,732	2.41	Measured – meter
Waste water discharged to sewer			
Losses to evaporation			
Losses in final product at Y% moisture content ²			
Losses in major waste stream outputs at Y% moisture content such as sludge ²			
Losses in major waste stream outputs at X% moisture content such as rejects (EWC 03 03 07) ²			

Performance Review

Sofidel UK Baglan has demonstrated a generally strong environmental performance in 2025, with most energy and emissions indicators showing improvement or remaining within Best Available Techniques (BAT)-Associated Emission Levels. Electricity and gas consumption per tonne decreased, and all monitored emissions parameters for water quality—COD, suspended solids, nitrogen, phosphorous, AOX, BOD, CO₂, and NO_x—remained well below BAT benchmarks. The site also maintained compliance during MCP monitoring for its gas boiler, and although one Priority Hazardous Substance parameter (Brominated diphenyl ether) could not be reported due to laboratory issues, the operator proactively communicated this to the regulator and has committed to retesting early in 2026.

The key regulatory concern for the year was three Schedule 5 notifications related to exceedances of the BOD limit (25 mg/L), attributed to a temporary failure of the effluent plant centrifuge. Repairs have since been completed and normal operations resumed. Waste generation increased by 19.6%—largely due to sludge tanker movements during the centrifuge outage—although several hazardous and general waste streams showed reductions. ISO 14001 and ISO 50001 audits reported no non-conformities. Overall, Sofidel’s performance indicates continued compliance with permit conditions, adequate operator responsiveness to issues, and a clear commitment to ongoing environmental improvement and decarbonisation initiatives. This was confirmed during a recent site

inspection where no areas of concern were identified.

Conclusion

This CAR was undertaken on 16 March 2026. However, to ensure that the CCS score is attributed to the correct financial year (for billing) the date on CARS has been altered to 31 December 2025.

Report compiled by:

Daren Pike
Senior Officer - South West Wales Industry Regulation Team
daren.pike@cyfoethnaturiolcymru.gov.uk

END OF REPORT

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.