# Compliance Assessment Report CAR_NRW0050893

**Permit being assessed:** LP3030XA.

**For:** Cardiff Energy Recovery Facility, **held by:** Viridor Trident Park Limited

**At:** Trident Park, Glass Avenue, Cardiff, CF24 5EN.

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

**Reason:** Routine.

**On:** 31/12/2025 between 14:20 and 16:15.

**Parts of permit assessed:** 1.1.1(a) and 1.1.1(b) and 4.2.2 and 4.2.3 and 3.1.2.

**NRW Lead Officer:** Geraint Harris.

**Report sent to**: Plant Manager, Plant Manager, on 17/03/2026.

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

| Part of permitted activity assessed (compliance criteria) | Assessment result | Permit condition |
|---|---|---|
| IR1A - Installations - Management - General Management | C3 Minor | 1.1.1(a) |
| IR3A(1) - Installations - Emissions and monitoring - Emissions to water | Assessed (A) | |
| IR3A(2) - Installations - Emissions and monitoring - Emissions to air | 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 |
|---|---|
| 1 | 4 |

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 |
|---|---|---|
| IR1A | Viridor must update their Management of Change (MoC) procedure to ensure all supplier initiated control system changes are captured, risk assessed, validated, and documented, throughout the MOC process and before plant | Already completed |

| Criteria | Action needed | Complete by |
|---|---|---|
| | restart. | |

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

**Q3 Monitoring Returns (Continuation of CAR_NRW0050183)**

**Carbon Monoxide Exceedance**:

On the 29th July 2025, Viridor Trident Park Ltd submitted a Schedule 5 Notification for a carbon monoxide (CO) exceedance on Line 2 at emission point A2. The full details of this non-compliance are documented in compliance report CAR_NRW0050183.

NRW concluded that the incident reflected weaknesses in Viridor's Management of Change (MoC) process and/or in its start-up and recommissioning arrangements following major maintenance works and control system upgrades. Several corrective actions implemented after the event, including logic synchronisation corrections and a reduced-load restart with enhanced monitoring, appear to be controls that would ordinarily be expected within pre-start validation or commissioning procedures. This raised questions regarding whether these measures had been proactively planned or were introduced reactively in response to the exceedance.

To clarify this, NRW issued Action 1 requesting that Viridor:

1. *Provide an overview of the processes applied prior to returning Line 2 to operation, including MoC steps and any start-up/recommissioning planning or validation checks.*
2. *Confirm whether the MoC process includes a requirement to review and update operating/commissioning procedures when changes are made, and whether this was done during the recent shutdown.*
3. *Explain whether the preventative measures applied post-incident (e.g., logic synchronisation checks, reduced-load restart with close monitoring) were originally planned or added reactively.*
4. *Supply copies of any procedures or instructions updated following the incident.*
5. *Describe how procedural updates arising from MoC or start-up planning are communicated, implemented, and verified on site (including relevant training/briefing records).*

**Viridor responded requesting that this is discussed in person on the 25th February 2026.**

During the meeting on 25th February, Viridor talked NRW through each of the points listed above. They then went on to explain that the recent control system changes formed part of their wider transition from Microsoft OPC Classic (DA) to OPC Unified Architecture (OPC UA). Viridor had previously completed an identical upgrade package at the Ardley facility and based on the success of that project, applied the same Management of Change (MoC) approach and supporting documentation for the Trident Park upgrade.

Viridor provided NRW with an overview of the MoC process that was followed prior to returning Line 2 to service, including pre-start checks, validation steps, and consultation with the combustion control system provider and the control system vendor. At Ardley, no operational issues had arisen from the upgrade and therefore there were no lessons learned that would have prompted changes to the Trident Park commissioning plan.

However, during the upgrade work at Trident Park, the combustion control system provider and the control system vendor agreed to implement an additional configuration change not envisaged during the original planning stage, namely the modification of the *"semi-auto mode"* function. Because this change had not been part of the Ardley upgrade, it was not captured within Viridor's MoC documentation or pre-start validation requirements for Trident Park.

Viridor explained that during start-up following the outage, due to an unforeseen issue in control system communications, the combustion system was unable to respond dynamically to combustion conditions and remained in a "frozen" state which led to combustion instability. When operators attempted to change control mode by selecting the system to 'semi-auto' mode during the instability, the function did not work and the system did not transition to "semi-auto" mode due to an incorrect configuration made during the earlier modification.

During the meeting, Viridor provided NRW with evidence of real-time attempts made on the day of the CO exceedances to diagnose the issue. When the instability persisted, the plant was taken off waste feed and subsequently shut down while the logic was corrected. Once the synchronisation issues were resolved, Line 2 was restarted at reduced load with enhanced monitoring to confirm stable performance.

Viridor acknowledged that the modification of the semi-auto mode and associated logic had not been anticipated, as this functionality had not been part of the Ardley upgrade. Consequently, it had not been risk assessed or incorporated into their MoC review, start-up planning, or commissioning procedures. This omission contributed to the logic fault going undetected until after the exceedance occurred.

During a meeting on the 25th February, Viridor identified a key lesson learned: where critical control signals are modified, in addition to a comprehensive signal check (like that had been undertaken a few days before start-up) being carried out, additional verification checks should be carried out immediately before start-up to confirm that all logic pathways function as intended. Had such checks been undertaken, Viridor may have been able to maintain effective combustion control and avoid the exceedance. The discussions on 25th February also highlighted limitations in Viridor's in-process Management of Change arrangements. Supplier-initiated adjustments were not consistently captured,

reviewed, or evaluated in real time, meaning that changes could be implemented mid-process without appropriate scrutiny or operational impact assessment.

It also appears that no effective post-implementation review took place with the third party contractors following completion of the upgrade. A robust review would typically confirm that all supplier-implemented changes had been fully documented, authorised, and functionally tested, and would likely have identified the discrepancy between the intended configuration and the actual installed logic. Instead, several critical checks relating to the "semi-auto" mode function were only performed after the exceedance. This demonstrates that important preventative controls, ordinarily embedded in MoC processes and commissioning procedures, were not applied until after an emission limit breach had already occurred.

The root cause of the CO exceedance therefore stems from deficiencies within the operator's management system relating to the control, assessment, documentation, and verification of changes to critical plant and software logic. The management system did not ensure that supplier-initiated changes could not bypass MoC controls, nor did it provide adequate assurance that commissioning processes reflected all modifications made. In failing to identify and evaluate this unplanned change, the operator did not manage the activity in accordance with permit condition 1.1.1(a). On this basis, and in line with NRW's compliance framework, this root-cause breach is categorised as C3 (Minor), as the reasonably foreseeable environmental impact of the management system deficiency is limited but credible, and cannot be lower than the category of the original emissions breach.

**Grate Downtime:**

Grate sifting blockages and repairs remain a recurring cause of downtime, with numerous events occurring on Lines 1 and 2 during Q3. Each event results in SU and SD periods, which are compliance-sensitive because combustion stability and oxygen correction make ELV control more challenging. NRW therefore sought assurance that these events were being actively reviewed to reduce their occurrence.

Two actions were put to Viridor in compliance report CAR_NRW0050183 relating to these downtime periods. In response Viridor reported that all periods of grate downtime in the Q3 report, whether due to blockages or grate damage, stemmed from the same underlying issue: an element in the fuel that triggered a thermite-type reaction on the grate. This reaction caused localised damage to the grate bar surface and resulted in nearby iron melting and running down through the grate. Once solidified, this material seized the grate movement and caused the subsequent downtime.

Viridor replied stating that they would be happy to discuss the investigation and its outcomes in more detail during an in-person meeting to support the discussion of Actions 2 and 3.

Viridor offered to discuss the investigation and its findings in greater detail in an in-person meeting to support Actions 2 and 3. This meeting took place on the 25th of February, during which Viridor presented NRW with a detailed technical explanation of the thermite-related events.

During the meeting, Viridor provided photographic evidence indicating the presence of molten waste residues, as well as images showing substantial damage to grate sections, including areas where the grate bars had been completely melted away. Viridor also conducted extensive research to understand

the mechanism behind these events. This included laboratory analysis of affected waste streams and consultation with the combustion plant OEM, to identify likely causes. In addition, Viridor contacted other European incinerator operators, whose reported evidence and experience closely matched Viridor's findings. Their combined analysis indicated the presence of reaction products consistent with thermite-type activity.

Viridor's visual and analytical evidence was characteristic of high-temperature attack and melting of steel grate elements. These thermite reactions are highly exothermic reductions of metal oxides (iron oxide) by reactive metals such as aluminium or magnesium can occur in waste incinerators when certain metals enter the furnace. These reactions can generate temperatures in excess of 2,500°C, which are capable of damaging incineration equipment.

Overall, these thermite-type reactions, whether driven by magnesium, aluminium, or a combination, represent a plausible mechanism for the observed grate melting, equipment seizure, and associated downtime.

Viridor explained that the thermite-type reactions occurred eight times during Q3 and have not been observed before or since. They therefore consider the incidents to have been triggered by a one off waste load that entered the bunker prior to the first event. Due to the large size of the bunker and the continuous mixing of waste, particularly following an extended shutdown, the reactive material was likely dispersed throughout the waste mass. This would explain why the reactions manifested on multiple, separate occasions as different batches of mixed waste reached the grate.

Because waste inputs were significantly reduced in the period leading up to the initial event, Viridor reviewed all incoming streams to identify any unusual or high-risk consignments that could contain elevated levels of aluminium or magnesium. One international waste stream was identified as a potential contributor, as it may have contained substantial quantities of aluminium cans. However, Viridor noted that this could not be confirmed with certainty. As a precautionary measure, the company has now ceased accepting this waste stream. No further incidents have occurred since, therefore no further actions regarding this matter are being issued.

**Q2 Monitoring (Continuation of CAR_NRW0050183)**

During Q2 monitoring, Viridor reported a VOC exceedance on Line 1 during start-up following major maintenance. Viridor shared their findings of their internal investigation into this incident with NRW. As part of NRW's root cause investigation, clarification was requested regarding Viridor's deployment of an agency crane driver during the night-shift start-up. NRW required evidence demonstrating how such personnel are integrated into Viridor's management system, including:

- Induction and site-specific training provided
- Competency assessment and documentation
- Supervision arrangements during critical operational activities

This information was required to demonstrate compliance with permit condition 1.1.1(b), which mandates the use of sufficient competent persons and resources.

Viridor, subsequently stated that the use of an agency crane operator during the outage was an additional control measure implemented in response to abnormally high bunker levels. Agency crane

drivers are fully integrated into Viridor's management system, receiving both role-specific competency training and site-specific induction and familiarisation. The operator involved has worked regularly at Trident Park since March 2023, with the most recent induction refresher completed in May 2025. During the start-up sequence, the crane operator worked from the control-room crane-operator chair under the direct supervision of both the Shift Operating Technician and the Shift Team Leader. This information supports NRW's assessment against permit condition 1.1.1(b), demonstrating that competent personnel and adequate supervision were in place. No further action is required.

**Q4 Monitoring Returns**

The Q4 monitoring returns were reviewed and found to be compliant.

Line 1, 15th December, downtime due to ash discharger blockage.

Line 2 Offline 6th October due to great blockage and repairs and the 2nd to the 5th of November due to urea port tube leak and grate repairs.

On the 25th February Viridor were asked the following: What were the causes of these incidents, and what learning or preventative actions have been identified from each event?

With regards to the great blockage on the 6th of October was identified as being the result of grate movement loss on certain sections of the grate. Such events require the incinerator going offline due to the build up of waste on the grates. With regards to the is incident Viridor were unable to identify the route cause and a visual inspection didn't indicate any damage.

Regarding the November downtime event, Viridor reported observing erratic combustion behaviour, followed by the identification of a tube leak originating from the urea port area. The unit load was reduced and the incinerator was subsequently brought offline.

Inspection confirmed that the leak resulted from a failure of a carbon-steel tube at the interface with the Inconel-protected section of the urea injection port. Several repair works were completed during the offline period, including replacement of the failed tube with an Inconel spiral-clad section. Viridor plan to upgrade all urea port tubes to spiral-wound Inconel inserts during the scheduled 2027 shutdown. All remaining urea ports on Line 2 were inspected during this outage and were found to be in acceptable condition. Viridor have also arranged for a spare urea port box to be stored onsite, in addition to the recently removed Line 2 unit, which will be refurbished and prepared for future use.

During the outage, Viridor undertook boiler cleaning and completed a number of additional maintenance tasks, including securing two loose tiles and carrying out grate repairs such as removing jamming points and replacing snapped grate bars. Viridor have also initiated refractory mapping following this breakdown. This is a critical activity for ensuring operational safety, extending the lifespan of the unit, and supporting forward planning for maintenance and repair interventions. No further actions.

**The Annual Surveillance Test (AST)**

In line with the updated Environment Agency guidance, additional reporting obligations now apply to

both Large Combustion Plants (LCPs) and waste incinerators/co-incinerators. Operators are required to submit detailed results from their Annual Surveillance Tests (ASTs) and QAL2 calibrations, ensuring that regulators receive clear and consistent information on the performance and validity of Continuous Emission Monitoring Systems (CEMS). This includes reporting whether the variability and calibration-validity elements of the AST have passed for each monitored pollutant, providing full details of any failures and subsequent investigations, confirming the dates of QAL2 tests, and specifying when any new calibration functions have been implemented within the Data Acquisition and Handling System (DAHS). For waste incinerators and co-incinerators, these are required to report information using the updated Air 9 forms, submitted within the relevant six-monthly reporting window.

In accordance with these strengthened reporting requirements, Viridor have submitted their AST data to NRW to ensure transparency, demonstrate compliance with EN 14181 quality-assurance obligations, and provide assurance that their CEMS calibration functions have been correctly assessed, maintained, and updated in line with regulatory expectations.

The annual surveillance test (AST) is a mini-QAL2 designed to verify whether the calibration functions determined during the original QAL2 remain valid over time. Although the AST uses the same functional tests as QAL2, it requires fewer repetitions of the standard reference methods (SRMs), typically five. If the AST confirms that the calibration function remains valid, no further action is required. However, if the calibration validity test fails, the operator must undertake a full QAL2. Failure of either test requires the operator to identify and investigate the cause of failure, implement corrective measures where appropriate, and complete a new QAL2. The resulting calibration functions must be installed in the data acquisition and handling system (DAHS) within six months.

Viridor carried out their 2025 AST programme for Line 1 duty and standby systems between the 29th of September and the 17th of October 2025. For Line 1 duty, HCl, NOx and CO each passed the variability element of the AST but failed the calibration validity test. Full QAL2s for each determinand were completed between 29th September and 3rd October 2025. For Line 1 standby, NOx, CO and $N_2O$ also passed variability testing but failed calibration validity; the corresponding QAL2s were undertaken between 6th and 17th October 2025. On Line 2 duty, HCl and NOx passed the variability checks but failed calibration validity, with QAL2s again carried out between 6th and 17th October 2025. For Line 2 standby, HCl, NOx and $N_2O$ showed the same pattern, variability passed, calibration validity failed, and new QAL2s were conducted within the same date range.

Upon discussion on the 25th of February 2026, Viridor are currently in the process of undertaking an internal review of the test data. Although the testing was undertaken in September and October of 2025, they did not receive the report until late January 2026. Viridor have consulted both with the testing company and Ricardo regarding the results and have some concerns regarding the SRM data. As it stands the new calibration functions haven't been inputted into the DAH. Viridor have a booked a two week window from the 18th of March where they can undertake a new set of QAL 2's should the need arise. Given the potential implications for compliance with ELVs, it is essential that Viridor continue to keep NRW updated on both the investigation into the AST failures and the outcomes of their internal review, including any corrective actions and timelines for implementing revised

calibration functions.

**R1 Performance Overview**

R1 energy efficiency at the Trident Park ERF was assessed across three reporting periods using the Environment Agency's approved method. In all years, the facility remained well above the 0.65 threshold required for recovery status. Calculated R1 values were 0.7489 (2023), 0.7905 (2024), and 0.7564 (2025), confirming continued compliance and stable recovery performance.

Variations in R1 largely reflected changes in electricity generation, export levels, and auxiliary fuel demand. The highest R1 value, 0.7905 in 2024, coincided with the strongest output of 316,851 MWh of gross generation and 281,497 MWh of export, which increased the Ep term in the R1 calculation. This was achieved despite unusually high auxiliary fuel use, including over 4.1 million litres of light fuel oil, indicating that operational conditions favoured high turbine output and export efficiency.

The 2023 period returned an R1 of 0.7489, supported by solid generation (299,208 MWh) and low auxiliary energy demand. In contrast, the 2025 assessment showed reduced gross and exported electricity (266,581 MWh and 231,161 MWh) and increased imported energy (2,264.77 MWh), resulting in an R1 of 0.7564. Although auxiliary fuel use fell sharply from 2024 levels, it remained higher than in 2023, with 950,915 litres of light fuel oil consumed.

Across all three years, the ERF consistently met R1 recovery status. Fluctuations in annual R1 values were driven primarily by changes in operational availability, generation levels, and auxiliary fuel consumption. The slight decline in 2025 reflects reduced availability and higher reliance on imported electricity rather than any inherent reduction in process efficiency. The wider performance trend from 2022–2025 shows R1 rising to a peak in 2024 before easing in 2025, in line with reductions in output and confirmed outages that year. This demonstrates that availability constraints, not process inefficiency, were the main factor behind the 2025 R1 decrease.

Commercial operation of the heat network commenced on the 1st November 2025. Viridor did not include any exported steam data in their 2025 R1 submission. During the meeting on 25th February, Viridor stated that this omission was due to human error and confirmed that they plan to resubmit the return with the exported steam data included.

**Trends**

| Parameter | Units | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 |
|---|---|---|---|---|---|---|---|
| Total waste received | Tonnes | 379,404 | 378,402 | 360,189 | 404,285 | 410,379 | 356862.0 |
| Total waste combusted | Tonnes | 379,390 | 378,393 | 360,189 | 410,913 | 410,379 | 354332.0 |
| Power Generated | MWh | 260,289 | 285,706 | 277,522 | 296,880 | 316,631 | 266472.0 |
| Power Exported | MWh | 233,023 | 255,062 | 246,684 | 264,456 | 281,923 | 235763.0 |
| Power Used on site | MWh | 29,676 | 31,387 | 31,116 | 30,985 | 34,391 | Not on form |
| Power Imported | MWh | 899 | 746 | 1,232 | 1,439 | 318 | 2264.0 |
| Power Generated | KWh/T | 686 | 755 | 770 | 722 | 772 | 752.0 |
| Power Exported | KWh/T | 614 | 674 | 685 | 644 | 687 | 665.0 |
| Power Used on site | KWh/T | 78 | 83 | 86 | 75 | 84 | Not on form |
| APC Residues - produced | % | 1.50 | 2.30 | 1.10 | 1.10 | 3.00 | 2.9 |
| IBA - produced | % | 17.5 | 19.9 | 18.6 | 17.4 | 21.7 | 21.3 |
| Metals recycling | % | 2.6 | 1.9 | 0.3 | 0.2 | 0.2 | 0.2 |
| Mains Water | ltrs | 39,213,000 | 44,693,000 | 51,834,000 | 67,394,000 | 77,077,000 | 69475000.0 |
| Urea | ltrs | 443,640 | 466,000 | 477,320 | 436,460 | 600,000 | 433335.0 |
| Activated Carbon | kgs | 131,040 | 137,000 | 134,000 | 168,600 | 224,000 | 219248.0 |
| Lime / hydrated lime | kgs | 3,991,280 | 4,489,000 | 4,439,000 | 6,413,000 | 7,817,000 | 5854862.0 |
| Fuel oil | ltrs | 470,593 | 546,842 | 341,898 | 443,745 | 286,260 | 561283.0 |
| Mains Water | ltr/t | 103.36 | 118.10984 | 143.91 | 164.01 | 187.82 | 196.1 |
| Urea | ltr/t | 1.17 | 1.23 | 1.3 | 1.06 | 1.46 | 1.2 |
| Activated Carbon | kg/t | 0.35 | 0.36 | 0.37 | 0.41 | 0.55 | 0.6 |
| Lime / hydrated lime | kg/t | 10.52 | 11.86 | 12.32 | 15.61 | 19.05 | 16.5 |
| Fuel oil | ltr/t | 1.24 | 1.45 | 0.95 | 1.08 | 0.7 | 1.6 |
| Overall combustion Availability | % | 88.6 | 89.1 | 85.4 | 91.5 | 95.1 | 83.9 |
| Hours of turbine operations | % | 95.5 | 95.8 | 91.7 | 92.9 | 97.6 | 88.0 |

A six-year trend data shows power generation per tonne increases steadily from 686 kWh/t in 2020 to a peak of 772 kWh/t in 2024, before easing to 752 kWh/t in 2025. Power export follows the same broad trajectory, rising from 614 kWh/t to 687 kWh/t by 2024 before dropping in 2025. These trends indicate progressive optimisation through to 2024, followed by a temporary contraction in the final year that aligns with the operational events affecting plant availability. Resource consumption indicators reinforce this interpretation. Mains-water usage rises consistently across the period, increasing from 103 L/t in 2020 to 196 L/t in 2025, suggesting greater cooling and process water demand as throughput and operational intensity grew. Urea use fluctuates modestly but generally tracks combustion stability, peaking during the high-output year of 2024. Activated carbon consumption shows a consistent upward trend, while hydrated lime use increases more sharply through 2024 before declining in 2025, suggesting fluctuations in acid gas load or the effects of process optimisation. In this case the reduction was led by a process optimisation whereby a significant improvement has been achieved following the switch of lime supplier, with excess lime in the air pollution control residues (APCR) reduced from 3.4% to 2.2%, indicating more efficient reagent utilisation and reduced wastage.

Fuel-oil consumption decreases between 2021 and 2024, then increases notably in 2025, a pattern consistent with increased start-ups and operational interruptions during a year with more downtime. The availability metrics provide the clearest explanation for the 2025 downturn.

Overall combustion availability increases from 88.6% in 2020 to a high of 95.1% in 2024, before dropping sharply to 83.9% in 2025. Turbine operating hours show the same pattern, improving to 97.6% in 2024 and then falling to 88.0% in 2025. These reductions correspond directly with the planned maintenance outage undertaken between the 18th May and 29th July 2025, during which

extensive maintenance and equipment repairs were completed. The outage inevitably reduced operational hours, constrained turbine availability, and increased the frequency of start-ups, factors which collectively reduced energy output per tonne and elevated auxiliary consumption, including fuel oil.

In addition to the extended outage, 2025 was shaped by the completion and commissioning of the district heating connection. Viridor finished on-site works in July, followed by cold and hot commissioning and a two-week reliability test in October. This large-scale integration work, together with the outage, temporarily affected generation efficiency, availability, and resource use, leading to the dip seen in several 2025 performance indicators.

By contrast, 2024 shows the strongest overall performance, with high availability, strong turbine output, and stable process conditions producing the highest power-per-tonne figures. The 2025 downturn is therefore best understood as the result of planned operational constraints rather than any reduction in underlying plant efficiency. Performance stability across 2020–2025 continues to demonstrate operational resilience and provides a solid platform for further optimisation as the district heating scheme becomes embedded.

The power used onsite data has been omitted from the E.A's reporting form and so is no longer required**.**

**Reported Efficiency Improvements in 2025**

Viridor reported the following efficiency improvements in 2025:

- Turbine hall high-bay fluorescent lighting changed to LED (Feb '25).
- ID fans replaced with most up-to-date energy efficient motors and VFDs to operate within energy efficient performance zone as part of major maintenance outage – completed July 2025
- Boiler feedwater pumps replaced with most up-to-date energy efficient motors and VFDs to operate within energy efficient performance zone as part of major maintenance outage – completed July 2025.

**Heat Network**

Construction works were completed in February 2025, including the connections to both the existing ERF plant and the off-site heat network. Further testing was carried out during the major maintenance outage in July 2025, followed by a period of cold commissioning. Once the off-site network was ready, hot commissioning on steam and functional testing were completed, culminating in a two-week reliability test in October 2025. All testing was successfully concluded, and the completion certificate was signed on the 31st October 2025, with commercial operation commencing on the 1st November 2025.

**Waste Returns**

Waste returns have been reviewed and accepted for 2025. The totals are as follows:

- Waste Received Q1 – 101381.36 tonnes.
- Waste Removed Q1 – 23587.881tonnes.
- Waste Received Q2 – 66526.301tonnes.

- Waste Removed Q2 – 17363.22 tonnes.
- Waste Received Q3 – 77206.42 tonnes.
- Waste Removed Q3 – 18420.18 tonnes.
- Waste Received Q4 – 111841.045 tonnes.
- Waste Removed Q4 – 27277.81 tonnes.

**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.