

Compliance Assessment Report CAR_NRW0050765

Permit being assessed: BT4885IT.

For: Shotton Paper Mill EPR/BT4885IT, **held by:** Shotton Mill Limited

At: WEIGHBRIDGE ROAD SHOTTON , DEESIDE, DEESIDE, CLWYD, CH5 2LL.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2025.

Parts of permit assessed: Routine Emissions Monitoring Returns and Annual Reports.

NRW Lead Officer: Stuart Ross.

Report sent to: Environmental Advisor, Environmental Advisor, on 19/03/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4C - Installations - Information - Notification	C3 Minor	4.3.2
IR4C - Installations - Information - Notification	C3 Minor	4.3.2
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR1A - Installations - Management - General Management	C3 Minor	1.1.1

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
7	28

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
IR4C	Review procedures and staff training to ensure Schedule 5 notifications are submitted to NRW in accordance with the permit requirements.	30/04/2026
IR4C	Review procedures and staff training to ensure Schedule 5 notifications are submitted to NRW in accordance with the permit requirements.	30/04/2026
IR3E	Provide NRW with an explanation as to the abnormal operating data presented in Form Performance 1 and a copy of the Boiler 7 abnormal operations log for 2025, to include an explanation as the reasons for each period of abnormal of operation.	30/04/2026
IR3E	Provide an explanation as to why all CEMs were out of service for 29 half hourly periods on 09/12/25.	30/04/2026
IR3E	Ensure all ELV exceedance during normal operations are reported to NRW.	18/03/2026
IR3A(2)	Remedial Action Complete	Already completed
IR1A	Remedial Action Complete	Already completed
IR3A(2)	Remedial Action Complete	Already completed
IR3A(2)	Remedial Action Complete	Already completed
IR1A	Remedial Action Complete	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

This Compliance Assessment Report follows a review of routine emissions monitoring returns for the period 01/01/25 - 31/12/25 as well as the 2025 annual report. As this period covers four monitoring periods (quarters) these have been assessed individually in accordance with NRW's compliance assessment guidance.

Q1 January - March 2025

1. Emissions to Air (Emission Point A20)

A) Continuous Emissions Monitoring Data

Emissions compliant.

B) Six Monthly Extractive Monitoring Data

No data reported for this quarter.

2. Emissions to Surface Water (Emission Point W1)

Emissions compliant.

3. Emissions to Sewer (Emission Point E1)

Emissions compliant.

4. Other Returns

Form Performance 2 received - nil return.

Form Residue 1 received - Incinerator Bottom Ash (IBA) Loss on Ignition (LOI) <0.2%.

Q2 April - June 2025

1. Emissions to Air (Emission Point A20)

A) Continuous Emissions Monitoring Data

During this period two Schedule 5 notifications were received for half hourly CO ELV exceedances.

- On 20/06/25 a Schedule 5 (Part A) notification was received for a single half hourly average recorded on 15/06/25 at 110.1 mg/Nm³ versus an ELV of 100mg/Nm³. The daily ELV was not exceeded. A Schedule 5 (Part B) notification was received 24/07/25.

The operator reported that the ELV exceedance was '*attributed to a fuel blockage within one of the fuel feeding streams. Waste ceased to be charged and the cause of the emission exceedance identified and resolved. The cause of the blockage has been identified and is attributable to a large piece of fuel. The source of the fuel has been identified and the matter investigated by the woodyard contractor. A root cause analysis has been completed and the source of the fuel identified. Quality control procedures have been reviewed and matter discussed with woodyard management to ensure corrective actions have been implemented to prevent further blockages in the fuel feeding screws. These procedures will continue to be audited*'.

This is a breach of permit conditions 3.1.2 and 1.1.1, each attracting a non-compliance score of C3. The operator has taken corrective action - no further action.

- On 24/07/25 a Schedule 5 (Part A) Notification was received for three half hourly averages recorded on 25/06/26 at 199.3, 111.1 and 103.1 mg/Nm³ versus an ELV of 100mg/Nm³. The daily ELV was not exceeded. A Schedule 5 (Part B) notification was received 24/07/25.

The operator reported that '*Waste ceased to be charged and the cause of the emission exceedance identified and resolved. The exceedances were found to have taken place when solid fuel delivery to the boiler was inconsistent due to the performance of the slewing screw. Initial actions resolved the matter temporarily and a detailed root cause analysis process was initiated to identify a robust, long term solution. The performance of the slewing screw was investigated and the root cause of the problem identified to be recurring issues with the ripper teeth. New slewing assemblies to be installed and ripper teeth have been replaced. Detail of maintenance routes and stock items have been reviewed to prevent further occurrences.*

This is a breach of permit conditions 3.1.2 and 1.1.1, each attracting a non-compliance score of C3. Scores are consolidated against each permit condition for this quarter. The operator has taken corrective action - no further action.

B) Six Monthly Extractive Monitoring Data

Emissions monitoring data was provided as required – emissions fully compliant.

2. Emissions to Surface Water (Emission Point W1)

Emissions compliant

3. Emissions to Sewer (Emission Point E1)

Emissions compliant

4. Other Returns

Form Performance 2 received - nil return

Form Residue 1 received, IBA LOI <0.2 %

6 Monthly CEMS Invalidation Log - No Issues**Q3 July - September 2025****1. Emissions to Air (Emission Point A20)****A) Continuous Emissions Monitoring Data**

Emissions compliant.

B) Six Monthly Extractive Monitoring Data

No data reported for this quarter.

2. Emissions to Surface Water (Emission Point W1)

Emissions compliant

3. Emissions to Sewer (Emission Point E1)

Emissions compliant

4. Other Returns

Form Performance 2 received - nil return

Form Residue 1 received, IBA LOI <0.2 %

Q4 October - December 2025**1. Emissions to Air (Emission Point A20)****A) Continuous Emissions Monitoring Data**

A single Schedule 5 notification was received 27/02/26 for numerous CO ELV exceedances during this period.

- On 26, 27, 28, 29 and 30 November a number of half hourly averages exceeded the ELV of 100mg/Nm³. The daily ELV of 50 mg/Nm³ was also exceeded 26 and 28 November.

The operator reported that '*This period was during and post start-up following a major month long maintenance shutdown. The exceedances above were identified to be attributed to variation in fluidised bed air pressure, which was addressed on the 30th November. Mechanical attachment of the piping to the ducting was immediately repaired upon identification. The exceedances were not reported immediately as they were thought to have occurred during start up and shutdown conditions and when waste had ceased to be charged, and were therefore incorrectly identified to be during 'other than normal'*

operating conditions. Upon review of the quarterly monitoring returns, it has been identified that the exceedances listed above did occur during normal operating conditions, and are therefore reportable.

Half hourly ELV exceedances are consolidated, as are the daily ELV exceedances, each is in breach of permit condition 3.1.2 attracting two separate non-compliance scores of C3. Failure to maintain the plant in a condition that ensures emissions compliance is breach of permit condition 1.1.1 and attracts a non compliance score of C3. The operator has taken corrective action - no further action.

As per previous Compliance Assessment Report actions, and as of 02/03/26, the operator has submitted new start-up and shut-down definitions for boiler 7 for agreement with NRW. The operator is due to install MCERTs certified Data Acquisition and Handling Software during Q3 2026 that will incorporate process logic derived from the start up and shut down definitions. This will prevent any ambiguity as to whether or not the plant was in start-up or shut-down.

Action 1 - Ensure all ELV exceedances during normal operations are reported to NRW.

Refer comment below regarding Schedule 5 Notifications.

B) Six Monthly Extractive Monitoring Data

Emissions monitoring data was provided as required – emissions fully compliant.

2. Emissions to Surface Water (Emission Point W1)

Emissions compliant

3. Emissions to Sewer (Emission Point E1)

Emissions compliant

4. Other Returns

Form Performance 2 received - nil return

Form Residue 1 received, IBA LOI <0.2 %

6 Monthly CEMS Invalidation Log - the log reports that 29 invalid hours were recorded 09/12/25. Following a review of the CEMS data log for December it is noted that this applies across all the CEMS i.e. particulate monitor, multi gas analyser and FID. The comments section states 'Socotec Q2 data'. It is noted from the 6 monthly extractive monitoring report that Socotec were present on site 09/12/25.

Action 2 - Provide an explanation as to why all CEMs were out of service for 29 half hourly periods on 09/12/25. Please do so by 30/04/26.

2025 Annual Returns

1. Form Performance 1

Boiler 7 - The report states that during 2025 there were three 'occasions' of abnormal operation with a cumulative annual total of 41 hrs.

As stated in permit condition 2.3.9(c), a single period of abnormal operation cannot exceed 4 hours. Therefore this reported data does not correlate with the permit requirements.

As detailed in Schedule 5 of the permit "*abnormal operation*" means any technically unavoidable stoppages, disturbances, or failures of the abatement plant or the measurement devices other than continuous emission monitors for releases to air of particulates, and CO, during which the concentrations in the discharges into air and the purified waste water of the regulated substances may exceed the normal emission limit values.

Action 3 - Provide NRW with an explanation as to the abnormal operating data presented in Form Performance 1 and a copy of the Boiler 7 abnormal operations log for 2025, to include an explanation as the reasons for each period of abnormal of operation. Please do so by 30/04/26.

2. W1 - Priority Hazardous Substances (PHS) Screen

The 2025 PHS screen was received, the report includes a significant number of additional determinands.

It is noted that the report is marked 'preliminary/interim' with some results missing but these do not include any PHS. Please ensure future submissions are the final version.

All PHS were detected at less than the limit of detection (<LOD) with the exception of mercury and PAHs. The operator should continue to monitor for any trends.

2025 Annual Report

The operator submitted an annual report that includes a review of monitoring data for the Boiler 7 emissions and discharges to surface water from W1. Given no paper making activities are underway no other emissions are considered in the report.

Schedule 5 Notifications

All Schedule 5 notifications submitted to NRW in 2025 regarding emission limit exceedances for Boiler 7 were received late, in breach of permit 4.3.2. This attracts a non compliance score of C3 and a score has been applied for each quarter where notification was late.

Action 4 - Review procedures and staff training to ensure Schedule 5 notifications are

submitted to NRW in accordance with the permit requirements. Please do so by 30/04/26.

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.