

## Compliance Assessment Report CAR\_NRW0051584

**Permit being assessed:** ZP3032KQ.

**For:** Afan Combined Heat And Power Facility, **held by:** Dwr Cymru Cyfyngedig

**At:** Afan Combined Heat And Power Facility, Phoenix Walk, Port Talbot, SA13 1RA.

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

**Reason:** Routine.

**On:** 22/04/2026.

**Parts of permit assessed:** CCRA Submission.

**NRW Lead Officer:** Daren Pike.

**Report sent to:** James Camis, Environmental Regulation Specialist, on 22/04/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	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

Thank you for submitting your climate change risk assessment.

We have carried out a basic review of your risk assessment and are satisfied it meets our current climate change risk assessment requirements.

There is no further action required at this stage, however the CCRA is a live document and should be reviewed periodically as part of your EMS and after any significant climate change related events or near misses.

### Climate Change Risk Assessment – Light Touch Review

**Site:** Afan WwTW CHP Facility

**Operator:** Dŵr Cymru Welsh Water

**Assessment type:** Report / Data review

**Event type:** Routine

**Permit element assessed:** General Management – Climate Change Risk Assessment

**Compliance criteria:** IR1A Installations – Management – General Management

---

### Summary of review

A desk-based light touch review has been undertaken of the Climate Change Risk Assessment submitted in response to the Regulation 61 notice. The purpose of this review was to confirm that the document has the potential to meet NRW's current climate change risk assessment requirements, rather than to carry out a detailed technical audit.

The review confirms that the assessment is site-specific, structured, and clearly related to the permitted CHP and associated anaerobic digestion activities at Afan WwTW. It considers both current climate impacts and future climate risks, including short, medium and long-term timescales.

---

### Coverage and scope

The assessment demonstrates that a range of climate hazards relevant to the sector and location have been identified and considered, including (at a high level):

- Temperature extremes (hotter summers and warmer/colder winters)
- Increased rainfall intensity and changes in seasonal rainfall patterns
- Storm events and high winds
- Drier summers and water availability
- Sea level rise and coastal influences

The document references future climate projections and scenarios and applies these to the site context. It identifies assets, infrastructure, and operational activities that could be exposed to climate-related risks and provides a prioritised approach based on initial and

residual risk ratings.

---

### **Risk management and adaptation**

For higher and medium risks, the assessment outlines existing control measures and potential mitigation or adaptation actions intended to reduce residual risk to acceptable levels. Actions are proportionate and relevant to the type and scale of activity and are framed within existing management systems, inspection regimes and contingency arrangements.

The assessment recognises the role of ongoing monitoring and review, with provision for periodic reassessment and update in line with new data, emerging climate trends, or significant events, supporting continuous improvement within the operator's environmental management system.

---

### **Light-touch checklist conclusions**

Based on the NRW light-touch review criteria:

- The assessment is site-specific ✓
  - Climate hazards relevant to the sector and location have been considered ✓
  - Short, medium and long-term risks are addressed ✓
  - Current and future climate projections are referenced ✓
  - Exposed elements (assets, infrastructure, operations) are identified and prioritised ✓
  - Actions to manage higher risks are identified and broadly proportionate ✓
  - KPIs are included in the submission ✓
  - Arrangements for review and update are described ✓
- 

### **Compliance position**

On the basis of this **light-touch desk-based review**, the Climate Change Risk Assessment is considered to **meet NRW's current CCRA requirements** for the purposes of Regulation 61 and permit condition 1.1.1(a).

#### **Assessment result:**

**A – Assessed, with no evidence of non-compliance**

#### **Recommended enforcement action:**

No further action

**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 Waste compliance criteria (used in section 1 and 2):****1. Management**

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

**2. Operations**

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

**3. Emission and Monitoring**

- W3A(1) – Emissions to water
- W3A(2) – Emissions to air
- W3A(3) – Emissions to land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

**4. Information**

- W4A – Records
- W4B – Reporting
- W4C – 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.