

## Compliance Assessment Report CAR\_NRW0049387

**Permit being assessed:** BC0003001

**For:** GOWERTON WwTW, **held by:** DWR CYMRU CYFYNGEDIG

**At:** GOWERTON WwTW, VICTORIA ROAD, GOWERTON, SWANSEA, SA4 3AB.

**Type of assessment carried out:** Check Monitoring/Sampling,

**Reason:** Other.

**On** 31/12/2024.

**Parts of permit assessed:** Monitoring and Reporting

**NRW Lead Officer:** Sarah Bennett.

**Report sent to:** CARS@dwrwymru.com, CARS Mailbox, on 11/05/2026.

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

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
WQ-D3 - Water Quality - Information - Notifications	C3 Minor	3.3.8 Unless otherwise agreed in writing by Natural Resources Wales, after becoming aware, or following notification that a sample has not been taken on the schedule 3C Monitoring Programme pre-scheduled date, or is lost, or a result for that sample cannot be reported, the operator shall notify Natural Resources Wales of the missed

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
		event and the reschedule date as soon as reasonably practicable
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	Action only (X)	

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

## 2. What action is required?

Criteria	Action needed	Complete by
WQ-D3	Please keep NRW informed about the investigation into the ALS complaint and update us with the findings from the ALS report	Already completed
WQ-C1	Ensure that all the scheduled monitoring specified in the permit is carried out and reported.	Already completed

Action 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

**Please note: this CAR is dated 31/12/24 as any non-compliances relate to annual 2024 data, however for clarity a compliance assessment was carried out on 15/09/2025 and subsequently edited to include further information and re-sent on the 11/05/2026.**

On the 5 September 2025, you notified us of a lab error for UWW Crude and Final Effluent sample analysis of Total Nitrogen taken on the 9 February 2024 at Gowerton Wastewater Treatment Works.

You informed us that DCWW subcontract all wastewater analysis to Wessex Water's laboratory. Wessex Water duly further subcontract some of the analysis to ALS's 17025/MCERTS laboratory.

On 8 August 2025, Wessex's Quality Manager contacted DCWW to advise that ALS had been in contact with Wessex to advise that, due to a failure to follow their own AQC Policy, some previously reported results for Kjeldahl nitrogen would need to have deviation

comments retrospectively entered.

Under the usual arrangement, DCWW ask Wessex not to report any regulatory samples with deviation comments but rather to cancel them instead. An additional sample is then rescheduled to be taken. However, in this instance all the results affected had already been reported to DCWW and (in the case of the regulatory results) reported to us. Hence is the only the option for Wessex was to add the deviation comments themselves and in turn for DCWW to have the deviation comments added (via the usual direct result transfer process) to the results on our own Laboratory Information Management System (LIMS).

An indicative result test comment was added to the following sample results/tests by Wessex:

Sample	Site	Date/Time	Batch Code	Test
7859282	Gowerton WWTW - Crude	09/02/2024 @ 08:47	SU	Kjeldahl Nitrogen
7859982	Gowerton WWTW	09/02/2024 @ 08:32	MS	Kjeldahl Nitrogen

You informed us that Wessex raised a formal complaint with ALS and, as part of the response, ALS carried out an investigation.

We asked you to provide us with the following information which you have done.

- The root cause of the AQC policy failures
- How these failures affected the samples at Gowerton WWTW and Afan WWTW

My understanding is that, ALS confirmed that given the nature of the AQC breaches involved, reported results were indicative of the actual result, but without a fully passing AQC, it was not appropriate for them to report the result as ISO17025 accredited and they therefore took the decision to withdraw the accredited results affected by the AQC failures and replace it with an analyst's comment providing the result as indicative only.

The issue was also discussion in the OSM Liaison Meeting on the 23/10/2025 where you provided further information on actions that have been taken by ALS to prevent future errors in AQC reporting.

Compliance assessment against permit condition 3.3.8 relating to sample shortfalls:  
3.3.8 Unless otherwise agreed in writing by Natural Resources Wales, after becoming aware, or following notification that a sample has not been taken on the schedule 3C Monitoring Programme pre-scheduled date, or is lost, or a result for that sample cannot be reported, the operator shall notify Natural Resources Wales of the missed event and the reschedule date as soon as reasonably practicable

As the sample was not analysed to the correct standards it could not count towards the

UWW sample submissions for 2024. This means that there was an UWW sampling shortfall in 2024.

**Action: Please keep NRW informed about the investigation into the ALS complaint and update us with the findings from the ALS report. I have logged this action as completed because you are already aware of the non-compliance and are investigating the cause.**

**Action: Ensure that all the scheduled monitoring specified in the permit is carried out and reported.**

It is an offence under Regulation 38 (2) of the Environmental Permitting Regulations 2016 for a person to fail to comply with or to contravene an environmental permit condition.

The above actions required in this report were given as formal Advice and Guidance intended to bring the discharge back into compliance with the Permit. You have completed the actions, and we are satisfied that action has been taken to minimise any future non-compliances.

Thank you.

Ends.

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 to 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
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

**Full list of water quality action criteria (used in section 1 and 2):****WQ A: Management**

- WQ-A1 General management

**WQ B: Operations**

- WQ-B1 Permitted activities
- WQ-B2 The site
- WQ-B3 Operating techniques
- WQ-B4 Improvement programme
- WQ-B5 Pre-operational conditions

**WQ C: Emissions and monitoring**

- WQ-C1 Emissions to water
- WQ-C2 Emissions to land
- WQ-C3 Emissions of substances not controlled by emission limits
- WQ-C4 Monitoring
- WQ-C5 Installation of monitoring boreholes

**WQ D: Information**

- WQ-D1 Records
- WQ-D2 Reporting
- WQ-D3 Notifications

**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.