

Compliance Assessment Report CAR_NRW0051865

Permit being assessed: BP0236601

For: Swansea Bay Wastewater Treatment Works, **held by:** DWR CYMRU CYFYNGEDIG

At: Fabian Way, Crymlyn Burrows, Swansea, SA1 8QP.

Type of assessment carried out: Report/Data Review,

Reason: Routine.

On 31/12/2025.

Parts of permit assessed: EDM Monitoring

NRW Lead Officer: Sally Sheehan.

Report sent to: CARS Mailbox, CARS Mailbox, on 18/05/2026.

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

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
WQ-D2 - Water Quality - Information - Reporting	C4 No impact	4.2.1 The operator shall send all reports and notifications required by the permit to Natural Resources Wales using the contact details supplied in writing by Natural Resources Wales.
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C2 Significant	3.3.1 The operator shall, unless otherwise agreed in writing by Natural Resources Wales, undertake the monitoring specified in the following tables

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
		in schedule 3 to this permit
WQ-A1 - Water Quality - Management - General management	C4 No impact	1.1.1 The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution so far as is reasonably practicable, including those risks arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints;
WQ-D3 - Water Quality - Information - Notifications	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-D2	Ensure that accurate information is reported by the deadline in the permit: Report to be submitted within 2 months of 1st January	Already completed
WQ-C1	<p>1. Please explain what action you will take to increase the EDM operational time to ensure compliance with the permit conditions.</p> <p>2. Please explain the root cause for non-compliance with EDM operational time. Including when the EDM monitor was back in operation and started recording.</p>	07/08/2026
WQ-A1	Please share your management procedure for EDM validation	07/08/2026

Criteria	Action needed	Complete by
	to NRW, highlighting the recent amendments.	
WQ-D3	<p>1. Please confirm if the trigger exceedance spill limit of 5 spills in the Bathing Water Season (15th May to 30th September inclusive) specified in Table S3.1 of your permit was exceeded in 2025?</p> <p>2. Has the lack of EDM data in 2025 affected the trigger event notification process? please explain.</p>	07/08/2026

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

During a routine compliance assessment check that we have carried out on 15/5/2026 it was noted that the EDM operational time for this asset was less than the minimum of 90% for the year of 2025. This report outlines the breaches of permit identified.

WQ D2 Reporting - Category 4 - Permit condition 4.2.1

On the 1st May 2026 you notified us that the result submitted to us in February 2026 for this site was wrong. The operational time provided in the 2025 EDM Annual return for BP0236601 Swansea Bay Wastewater Treatment Works was 99.9% however on the 1st May 2026 you notified us of an error in your original submission and that the accurate result for this site was 16.97%. You are in breach of this condition as the accurate result was submitted after the agreed deadline.

WQ C1 Emissions to water - Category 2 - Permit condition 3.3.1

16.97% operational time for 2025 is in breach of this condition.

Guidance for scoring the non-operational time suggests that this may have had a Category 2 impact: when the EDM is operational for 10.01-30% of the calendar year. The lack of data makes it unlikely that they can confidently say the SFT limit has not been exceeded. It also suggests that the overflow is receiving inadequate monitoring and therefore they are unlikely to have reacted adequately to any problems.

WQ A1 General Management - Category 4 - Permit condition 1.1.1

On the 1st May 2026 you notified us that you had discovered an error with your EDM validation process. The process caused the issue at this EDM monitor to go undetected, causing an error in reporting. You are in breach of this condition as your management of

the EDM validation process did not identify the issue in a timely manner and caused a breach of permit.

It is concerning that following multiple errors in your EDM submission last year and assurances to us that there were steps put in place to prevent this that there has been a further error. It is also a concern that for a bathing water site the EDM monitor has recorded for only 16.97% of the year and was not detected and rectified sooner. However I am reassured that you have put steps in place to make sure that this does not reoccur at this asset and for other high-profile assets and you are currently implementing a large scale improvement project for EDM assets across Wales .

WQ D3 Notifications - action only - permit condition 3.1.6

The permit requires you to notify us if the site spills more than 5 times in the bathing season. We note that this site has breached the trigger in previous years but we did not receive a trigger event notification for 2025. Has the lack of EDM data in 2025 affected this process?

Please respond to the actions above by the deadline.

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

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.