

Compliance Assessment Report CAR_NRW0050640

Permit being assessed: NP3233XX.

For: Bridgend Waste Management Centre, **held by:** Tradebe Gwent Limited

At: Factory Lane, Pencoed, BRIDGEND, CF35 5BQ.

Type of assessment: Audit,

Reason: Routine.

On: 31/12/2025.

Parts of permit assessed: 1.1.1(a) and 3.5.1 and 3.1.2 and 4.3.1(b) and 4.2.2(a,b&c) and 1.2.1(a) and 1.3.1(a) .

NRW Lead Officer: Geraint Harris.

Report sent to: Site Manager , Site Manager , on 20/05/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.5.1(a)
IR1A - Installations - Management - General Management	C3 Minor	1.1.1(a)
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR4C - Installations - Information - Notification	C3 Minor	4.3.1(b)
IR1A - Installations - Management - General Management	Action only (X)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR4B - Installations - Information - Reporting	C4 No impact	4.2.3(c)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Action only (X)	
IR4C - Installations - Information - Notification	Action only (X)	
IR4B - Installations - Information - Reporting	C4 No impact	4.2.2(c)
IR4B - Installations - Information - Reporting	C4 No impact	4.2.2(a)
IR1C - Installations - Management - Energy Efficiency	Assessed (A)	
IR1D - Installations - Management - Efficient use of raw materials	Assessed (A)	
IR4B - Installations - Information - Reporting	C4 No impact	4.2.5

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

Total non-compliances recorded	Total non-compliance score
12	32.4

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
IR3E	Undertake an intensified 12 week monitoring programme to demonstrate that mercury emissions to water are consistently low and stable. Although the existing quarterly dataset suggests there may be potential for reduced frequency monitoring in the future, a robust evidence base is required before any variation can be considered. To support this, Tradebe will carry out a 12 week programme in which effluent samples are collected every 12 days and submitted to ALS for analysis. This timeframe is considered sufficient to capture the range of waste types typically received at the site and should reflect normal variability in effluent composition.	11/05/2026
IR1A	Action1: Tradebe must review, update, and implement its Management of Change (MoC) procedure to ensure that any change to monitoring methods, sampling plans, analytical arrangements, operational practices, or compliance related activities cannot be introduced without full regulatory assessment. Tradebe must submit the following to NRW: <ul style="list-style-type: none"> • A copy of the revised MoC procedure, • Evidence of how it has been implemented into the site management system, and • A brief statement explaining how the revised system will prevent recurrence of the non compliance identified under permit condition 1.1.1(a). 	13/03/2026

Criteria	Action needed	Complete by
IR3A(1)	Bring zinc emissions back into compliance	Already completed
IR3A(1)	Bring Zinc emissions back into compliance	Already completed
IR3A(1)	Bring Chromium emissions back into compliance	Already completed
IR4C	In the event of a breach of any permit condition the operator must immediately: <ul style="list-style-type: none"> (i) inform Natural Resources Wales, and (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time; 	Already completed
IR1A	Action 2: To fully determine the extent of the EMS failure in relation to regulatory notifications, NRW now requires Tradebe to undertake its own internal investigation into the adequacy and effectiveness of its management system. This should include a detailed review of the EMS sections dealing with incident management, non conformance, monitoring, and communication, with particular emphasis on whether a dedicated Regulatory Notification Procedure exists and is being followed in practice. Tradebe must identify any procedural gaps, governance weaknesses, or training deficiencies that have contributed to the missed exceedances and failure to notify NRW, and set out the corrective and preventative measures it will implement to ensure full compliance with permit requirements, including Condition 4.3.1(b). Completion of this review, along with evidence of improvements, should be provided to NRW by the 13th of March 2026.	13/03/2026
IR3A(1)	Bring AOX emissions back into compliance	13/03/2026
IR3A(1)	Bring AOX Emissions back into compliance	13/03/2026
IR4B	Resubmit the reporting forms with the highest AOX values for each quarter.	13/03/2026
IR1A	CAR_NRW0050273 Action 24: Please provide a detailed root cause investigation into the AOX exceedances recorded in 2025, including contributing factors, operational or process changes, and any corrective or preventative measures identified. Response due 13th March 2026.	13/03/2026
IR4C	CAR_NRW0050273 Action 23: Please provide a Schedule 5 Notice with the completed part B section for both AOX exceedances stating your measures taken, or intended to be taken, to prevent a recurrence of the incident.	13/03/2026
IR4B	Submit waster usage reporting form as soon as possible.	Already completed

Criteria	Action needed	Complete by
IR4B	Submit a revised version with the correct information.	Already completed
IR4B	Action 3: Tradebe are therefore required to review the Q2 and Q3 returns in full, identify the cause of the error, and resubmit corrected data. Tradebe must also provide an explanation of the steps taken to ensure that future reporting processes are robust and prevent similar occurrences. Due 13th March.	13/03/2026

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.

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

Mercury Monitoring

An onsite meeting was held with Tradebe Bridgend on 21st January 2026 to discuss the actions set out in CAR_NRW0050273 relating to mercury monitoring and compliance with Permit Condition 3.5.1. Tradebe provided additional information regarding their pre-acceptance and technical assessment processes, including how mercury-containing wastes are identified and screened. Further details were also provided on the analytical methods used for mercury monitoring both onsite and by their external laboratory.

1. Pre-Acceptance Procedures and Mercury Screening

Tradebe explained that all customers must declare the presence of mercury in any waste stream through the Material Assessment Questionnaire (MAQ). This declaration forms part of the pre-acceptance checks conducted by the Technical Assessment Department, who review the waste generation process to identify whether mercury may be present. Relevant extracts from the *Pre-Acceptance Analysis & Technical Evaluation Procedure* (PBLA 121 Issue 2), submitted as part of their improvement condition response, set out the following key controls.

Material Declaration and Sampling:

Section 1.1.5 requires that an MAQ be completed for each waste stream, with a sample load evaluation carried out upon arrival at site. Sections 1.2–1.3 specify that a minimum 450ml sample must be provided with a completed questionnaire, with samples quarantined where declarations are missing.

Laboratory Analysis and Determinant Selection:

Section 2.1 confirms that pre-acceptance analysis includes quantitative testing for any constituents declared by the producer that may affect compliance with the PPC permit. Determinants for analysis are selected by the Technical Manager with reference to the FBLA 001 Analysis Matrix (Section 2.2). Sections 2.3–2.4 require that all analysis be carried out using agreed laboratory procedures and

recognised analytical methods.

Evaluation, Acceptance and Caveats:

Sections 2.6–2.9 set out that analytical results are reviewed by site staff, with acceptance decisions based on the technical evaluation. FBLA 009, *Caveats for Physico-chemical Treatment Material* includes the requirement “NIL Hg/Cd or prescribed substances” for all streams, with additional caveats applied where necessary.

Based on these processes, Tradebe stated that any waste suspected of containing mercury would be identified and assessed before acceptance, and may be rejected or attract surcharges where mercury is detected.

2. Mercury Monitoring and Analytical Capability

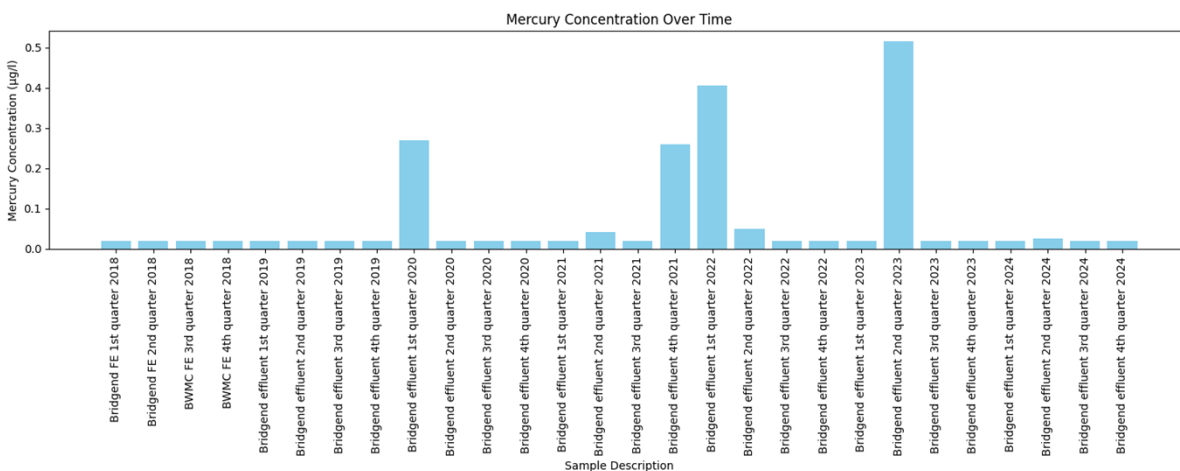
Tradebe’s Effluent Monitoring Programme commits to daily mercury monitoring, stating that mercury analysis is conducted using ICP-OES and atomic absorption spectrophotometry (DMA-80, ISO 12846). However, the onsite review identified several limitations.

2.1 Limitations of On-Site Analytical Equipment

The standalone mercury analyser has a limit of detection (LOD) of 20 µg/L, higher than the permit ELV of 10 µg/L, rendering it unsuitable for regulatory monitoring. The ICP-OES instrument is less sensitive still, with an LOD also above the ELV. Tradebe confirmed that their ICP-OES has never produced a mercury result above its detection threshold.

2.2 Reliance on External Laboratory Data

Due to these limitations, in 2025 Tradebe has relied on monthly analysis conducted by ALS, using TM183 (PSA cold vapour atomic fluorescence spectrometry), accredited to ISO 17025. ALS results for mercury consistently measured below 0.2 µg/L, well below the ELV. Previous quarterly monitoring data also showed consistently low concentrations, with the highest recorded value representing only 5.15% of the ELV. Tradebe also confirmed that mercury-containing wastes are screened out during pre-acceptance, further reducing the likelihood of mercury entering the treatment process.



Despite this, the substitution of daily monitoring with monthly or quarterly external analysis does not

meet the permit requirement for daily monitoring, and no written agreement was sought from NRW to reduce monitoring frequency.

3. Likelihood of Mercury Discharge

Taking into account the pre-acceptance controls, customer declarations, technical assessment procedures, caveats requiring “NIL Hg”, and consistently low external PSA monitoring results (<0.2 µg/L), NRW considers the likelihood of mercury having been discharged to sewer during the period in question to be very low. However, this does not mitigate the compliance breach, as the permit’s monitoring requirements must be met irrespective of the assessed environmental risk.

4. Compliance Assessment and Classification

Mercury was added to the permit on the 17th August 2022 in line with Waste Treatment BREF requirements. This means that for a period exceeding three years, the monitoring undertaken at the site did not comply with permit conditions. Under BAT Conclusions 7 and 20, the mercury ELV is mandatory wherever mercury is relevant. Although BAT 20 allows monitoring frequency to be varied where relevance is demonstrated, Tradebe Bridgend did not submit any relevance assessment, justification, or formal request to NRW to reduce the frequency of mercury monitoring or exclude mercury from the wastewater inventory. In the absence of such a request, the permit requirement for daily monitoring remained fully applicable.

Permit Condition 3.5.1(a) requires monitoring to be carried out in accordance with Schedule 3 unless NRW agrees otherwise in writing. No such written agreement exists for this site. The decision to move from daily to quarterly monitoring appears to have been made unilaterally, based on an assumption that agreement under a different permit could be transferred to this permit. This assumption is invalid. It is also unclear whether any Management of Change (MoC) process was followed or whether Tradebe maintains an MoC process for decisions of this type. The absence of clear change-control processes further undermines compliance.

As a result, the failure to undertake daily mercury monitoring constitutes a breach of Permit Condition 3.5.1(a). **NRW therefore classifies this as a Category 3 Non-Compliance.** This classification is justified because a mandatory monitoring requirement was not met; mercury is a hazardous, high-risk substance subject to BAT-associated ELVs; Tradebe reduced the monitoring frequency without obtaining the required written approval; NRW was unable to verify compliance with the mercury ELV or assess environmental risk during the non-compliant period; the breach persisted for more than three years; and Tradebe may have realised an economic benefit by avoiding the cost of daily monitoring, which is relevant for CCS scoring.

5. Proposed Monitoring Approach Going Forward

Tradebe has proposed undertaking an intensified 12-week monitoring programme to demonstrate that mercury emissions to water are consistently low and stable. Although the existing quarterly dataset suggests there may be potential for reduced-frequency monitoring in the future, a robust evidence base is required before any variation can be considered. To support this, Tradebe will carry out a 12-week programme in which effluent samples are collected every 12 days and submitted to ALS for analysis. This timeframe is considered sufficient to capture the range of waste types typically received at the

site and should reflect normal variability in effluent composition.

Sample Preservation and Stability Considerations

Mercury in aqueous effluents is highly unstable due to volatilisation, adsorption onto container surfaces, and chemical transformation. Without proper preservation, significant losses can occur within days. To ensure reliable data:

- Container Material: Glass (borosilicate) or PTFE containers should be used, as plastic containers increase the risk of mercury loss by adsorption.
- Preservation: Samples must be acidified to pH <2 using HCl or HNO₃ immediately after collection. For higher-organic matrices, oxidising preservatives such as potassium permanganate–persulfate (KMnO₄–K₂S₂O₈) or bromine monochloride (BrCl) provide improved stability by maintaining mercury in the oxidised Hg²⁺ state.

These requirements reflect recognised best practice for low-level aqueous mercury preservation and are supported by research from the Royal Society of Chemistry and peer-reviewed literature on mercury speciation stability. Tradebe must therefore ensure that sampling, preservation, storage and transport throughout the 12-week programme comply with recognised standards so the dataset generated is robust, representative and suitable for regulatory decision-making.

6. Root cause

The EMS failure identified in this case is not the result of a formal, systematic audit of Tradebe's written procedures, including any documented Management of Change (MoC) process. Instead, the failure is demonstrated through the operator's actions and decision-making. There is no evidence that an MoC procedure was applied when daily mercury monitoring was reduced, and it remains uncertain whether such a procedure exists at all. Key decisions, particularly the unilateral downgrading of monitoring frequency, were taken without documented justification, risk assessment, or any form of internal governance, all of which would be expected under an effective EMS. The absence of any documented MoC decision-making for a change that directly affected regulatory compliance further demonstrates that the management system was not operating as required. In addition, the operator acknowledged that the decision had been based on an agreement under a different permit rather than any structured or controlled process within their own EMS.

Taken together, these factors show that the EMS has failed in practice, regardless of whether written procedures exist on paper. NRW assesses the effectiveness of an EMS on how well it is implemented and how reliably it ensures compliance, rather than on the mere existence of documented procedures. The reduction in monitoring frequency appears to have arisen from an oversight during parallel discussions with NRW in relation to similar matters at another permitted site, where Tradebe believed that a request for reduced monitoring frequency at Bridgend had been made and agreed but this was not formally confirmed in writing. While Tradebe has attributed this to human error, the absence of formal confirmation and permit-specific verification indicates a breakdown in the application of Management of Change (MoC) processes. Regardless of intent, this resulted in a change affecting permit compliance being implemented without the required regulatory agreement. This demonstrates a weakness in the implementation of compliance controls, particularly in ensuring that each environmental permit is treated as legally distinct and that changes are

subject to appropriate review and verification before being acted upon

On the other hand, even if staff misunderstood the regulatory framework, an effective MoC process should have prevented this error from leading to operational non-compliance. A functioning MoC system would have required the operator to review the permit, assess the regulatory implications of any change, evaluate associated risks, and obtain appropriate internal approvals before altering monitoring practices. The absence of these steps indicates that the inadequacy of MoC arrangements is the underlying structural weakness that allowed the misunderstanding to result in compliance failure. For these reasons, the management-system failure can be legitimately recorded as a root cause of the non-compliance. **Consequently a category 3 noncompliance is being issued against permit condition 1.1.1(a).**

Action1: Tradebe must review, update, and implement its Management of Change (MoC) procedure to ensure that any change to monitoring methods, sampling plans, analytical arrangements, operational practices, or compliance-related activities cannot be introduced without full regulatory assessment. Tradebe must submit the following to NRW:

- A copy of the revised MoC procedure,
- Evidence of how it has been implemented into the site management system, and
- A brief statement explaining how the revised system will prevent recurrence of the non-compliance identified under permit condition 1.1.1(a).

Please submit by the 13th of March 2026.

Reliability of Hexavalent Chromium (Cr(VI)) Monitoring at Tradebe

Tradebe's permit requires daily monitoring of hexavalent chromium (Cr(VI)) in their effluent. Although BAT 20 allows monitoring frequencies to be adjusted based on relevance, any such change must be supported by robust evidence and formally agreed in writing with NRW. In their response to Improvement Condition 5, Tradebe explained that Cr(VI) analysis was undertaken quarterly by an accredited external laboratory. They reported that external results showed no detectable Cr(VI) in the trade effluent and therefore proposed that quarterly monitoring was sufficient. This was accepted in compliance report CAR_NRW0040524, which confirmed that Cr(VI) levels were considered sufficiently low and stable to justify quarterly monitoring.

However, Tradebe's later response to Action 4 (CAR_NRW0046371) revealed a significant issue: internal daily monitoring data showed repeated exceedances of the Cr(VI) ELV (CAR_NRW0050273). In total, 17 possible exceedances occurred within a single year. This is a substantial compliance concern and suggests a potential pattern of ongoing non-compliance. Hexavalent chromium monitoring was introduced into the permit on the 17th August 2022 under the Waste Treatment BREF, meaning this requirement has been in force for more than three years. While it is unclear whether similar exceedances occurred between 2022 and 2024, the 2024 dataset strongly indicates persistent issues.

These concerns were discussed with Tradebe on the 21st January at their Gwent offices in Newport.

During the meeting, Tradebe explained that throughout 2024 they were developing an internal analytical method for Cr(VI). They confirmed that the Cr(VI) method was still being established, adjusted, and optimised during this period, and that the results produced were therefore unreliable. Tradebe further acknowledged that ongoing procedural adjustments were required to account for analytical interferences, meaning the 2024 results were not representative of a validated method and should not have been submitted as monitoring data. This aligns with NRW's own assessment of the dataset.

Total chromium (Cr-total) is analysed at Tradebe using EN ISO 11885 (ICP-OES), as described in their Effluent Monitoring Programme. This method relies on atomisation of the sample in a high-temperature plasma, which destroys oxidation states and measures all chromium species collectively. As a result, total chromium data produced via ICP-OES is generally robust and chemically reliable. The dataset for 2024 supports this, with Cr-total results showing consistent behaviour across the year and only a single exceedance on 8th April 2024.

In contrast, Cr(VI) must be measured using a separate speciation technique, such as EN ISO 18412, ISO 10530, EPA 7196A, or EPA 7199, all of which are highly sensitive to matrix interferences, including turbidity, colour, organic content, redox conditions, preservation issues, and exceedances of holding time. Tradebe confirmed that their internal Cr(VI) testing was being actively modified in 2024 to address interference issues, and that the method had not been validated.

A key indicator of analytical failure is the fundamental chemical principle that Cr(VI) cannot exceed total chromium, because total chromium is the sum of Cr(III) and Cr(VI). Any instance where Cr(VI) exceeds total chromium is chemically impossible and indicates methodological error. Tradebe's own dataset shows six such occurrences in 2024, including cases where Cr(VI) exceeded total chromium by more than 300%. Additional inconsistencies include abrupt mid-year changes in Cr(VI) trends, frequent reporting of Cr(VI) at 80–100% of Cr-total, and erratic variation in Cr(VI) levels despite stable Cr-total values. These characteristics are typical of colour and turbidity interference, pH preservation failures, matrix effects, and incomplete method validation, all consistent with the developing analytical procedure described by Tradebe.

Based on Tradebe's confirmation that the Cr(VI) method was under development during 2024, the presence of multiple chemically impossible data points, the wider pattern of analytical inconsistencies, the well-known susceptibility of Cr(VI) methods to matrix effects, and the contrasting robustness of the total chromium results, it is concluded that the 2024 Cr(VI) dataset is not analytically reliable and cannot be used for regulatory compliance purposes.

Given this, no reliance should be placed on Tradebe's in-house Cr(VI) results for 2024. The fact that the method was still producing unreliable results as late as November 2025 also indicates that the current in-house procedure may still not be suitable for reporting. Tradebe should therefore continue to submit quarterly Cr(VI) results from the accredited external laboratory, as required. Until NRW is satisfied that Tradebe's in-house Cr(VI) method is fully validated, reliable, and free from interference, any exceedances identified through the internal method cannot be used for assessment against the permit ELVs.

Zinc and Total Chromium

The 2024 monitoring data shows that zinc emissions from Tradebe Bridgend exceeded the permitted limits on two separate occasions, as recorded under CAR_NRW0050273. Zinc concentrations of 2.24 mg/L on 6th February 2024 and 3.769 mg/L on 7th October 2024 were both above the site's emission limits. Despite this, NRW did not receive notification of either exceedance at the time.

In addition to the zinc breaches, monitoring results identified that total chromium exceeded its permit limit on the 8th April 2024, with a measured concentration of 0.43 mg/L compared with the permitted limit of 0.30 mg/L. Again, NRW received no notification relating to this exceedance.

The site's environmental permit requires Tradebe to measure both zinc and total chromium concentrations in accordance with ISO 11885, a requirement Tradebe confirmed they were following as part of their improvement condition response. During the meeting of the 21st January 2026, Tradebe stated that the elevated concentrations were obtained from the flow-proportional composite sampler. The site operates a batch-based treatment system and normally samples directly from the treatment tanks prior to discharge. Tank sample results from the days immediately before and after each composite exceedance were reportedly compliant.

However, the permit specifies that the authorised emission point for treated effluent is S1, the final effluent discharge point, and the elevated composite samples were taken from this location. Therefore, these results must be considered representative of emissions at the permitted point and constitute permit breaches.

NRW requested an explanation as to why these three exceedances, two for zinc and one for total chromium, were neither identified nor reported in accordance with permit requirements. This was formalised as Action 18, with a response due by the 2nd February 2026.

There are several plausible causes for the elevated results, including the exceedances reflecting true emissions, inadequate cleaning or maintenance of the composite sampler or sample container, insufficient mixing of the treatment tanks leading to unrepresentative sampling, laboratory error, or potential cross-contamination. None of these possibilities have been investigated to date, although some may be explored further during a future OMA audit. Nonetheless, as the samples were taken from the correct authorised sampling point, the results must be considered valid.

Consequently, the two exceedances for zinc and the single exceedance for total chromium are being scored individually against permit condition 3.1.2, as exceedances of different emission limit values cannot be consolidated. NRW's compliance assessment framework states that "*Exceedances of different emission limit values (ELVs) should be assessed separately and not consolidated together.*" Each exceedance therefore requires its own compliance assessment entry in line with the consolidation rules for monitoring data.

Each of these breaches are categorised as Category 3 (Minor) based on the reasonably foreseeable impact of the exceedances. Although chromium and zinc can both pose environmental hazards at elevated concentrations, the circumstances of these breaches, short duration, limited scale, and dilution at the receiving water, indicate a *minor or minimal reasonably foreseeable impact*, meeting the definition of Category 3 non-compliance.

- Total Chromium: Chromium emissions to water are of concern because hexavalent chromium [Cr(VI)] is a highly toxic, mobile and persistent form that can cause carcinogenic, mutagenic, and reproductive harm, and can adversely impact aquatic organisms even at low concentrations. However, based on the limited exceedance and the available contextual information for this discharge, the reasonably foreseeable impact in this instance is considered minor.
- Zinc: Although zinc is an essential micronutrient at trace levels, elevated concentrations are toxic to aquatic life. Zinc is a persistent metal that can accumulate in sediments, potentially affecting benthic species. In this case, the exceedances were short-lived and unlikely to result in significant or lasting harm, and therefore the reasonably foreseeable impact is assessed as minor.

Taking into account the toxicity profiles of chromium and zinc, the exceedance magnitudes, the nature of the receiving environment, and the definition of Category 3 within NRW's compliance assessment framework (potential for minor or minimal impact), the Category 3 classification is appropriate and proportionate for each exceedance.

It is of particular concern that these elevated emissions were not identified by the operator at the time they occurred. None of the exceedances were flagged internally, escalated, or raised during morning operational meetings. In addition, the absence of any notification to NRW represents a clear failure to comply with the permit's reporting requirements. These omissions raise significant concerns regarding the reliability of the operator's monitoring system, the robustness of their data review processes, and the overall effectiveness of their internal environmental compliance controls.

Tradebe failed to immediately notify NRW of these permit breaches, as required under condition 4.3.1(b). This constitutes a non-compliance due to the absolute nature of the notification requirement, which exists to ensure full regulatory oversight irrespective of the actual or perceived environmental impact. The lack of timely notification prevented NRW from assessing and responding to potential environmental risks when the exceedances occurred.

A similar incident took place in 2025, when the six-monthly monitoring return submitted on the 15th July 2025 reported an elevated AOX concentration of 3.11 mg/L against a permit limit of 1 mg/L. The sample was taken on 8th April 2025 at 15:30, yet NRW did not receive notification of this breach until Tradebe were instructed to submit a Schedule 5 Notice on the 11th September 2025. This repeated failure reinforces concerns about inadequate internal escalation and reporting systems.

Condition 4.3.1(b) establishes a clear procedural duty that applies independently of any environmental impact assessment. Its absolute nature is deliberate: it removes the operator's discretion to determine which breaches are "significant" and ensures that all non-compliances are brought to the regulator's attention promptly. This approach supports NRW's wider regulatory objectives, including early intervention, cross-agency coordination where required, and maintaining accurate and complete compliance records. That NRW identified these breaches through its own review, rather than through operator reporting further demonstrates deficiencies in Tradebe's internal monitoring and notification arrangements. This represents a systemic compliance management failure that could lead to more

serious consequences in future incidents.

These separate failures to notify NRW of ELV exceedances constitute non-compliance with permit condition 4.3.1(b). In accordance with NRW's compliance assessment framework, these notification failures are consolidated into a single non-compliance score, as they relate to repeated breaches of the same permit condition (3.1.2) and arise from a common underlying failure in the operator's internal monitoring and escalation procedures. The decision to score this notification failure **as a Category 3 non-compliance** is proportionate and consistent with NRW's compliance assessment framework. It underscores the importance of robust internal monitoring, effective review processes, and prompt reporting. Allowing operators to circumvent notification duties based on their own interpretation of environmental significance would create unacceptable regulatory blind spots and undermine the integrity of environmental oversight.

Going forward Tradebe said that they will update their spreadsheet so that all tank and effluent data can be reviewed simultaneously so that future exceedances will hopefully not be missed. Furthermore, the SHEQ and lab manager will review the data every morning, a 4 eyes approach as part of Tradebe's morning meetings.

Tradebe has indicated that it will update its spreadsheet so that tank and effluent data can be reviewed simultaneously, reducing the likelihood of future exceedances being missed. In addition, both the SHEQ Manager and the Lab Manager will review the monitoring data each morning, creating a "four-eyes" check within Tradebe's daily morning meetings.

Under NRW's regulatory framework, when we identify a non-compliance we must investigate the root cause, because the initial breach is often only a symptom of an underlying systemic issue. Many breaches arise from failures in staff competence, plant maintenance, or crucially deficiencies in the operator's management system, such as inadequate procedures or poor implementation. If we do not identify and address these underlying EMS weaknesses, the operator may correct the immediate issue but the same failures will continue to recur, potentially leading to further breaches or environmental harm. Properly identifying the root cause ensures that we record the management-system non-compliance separately and require corrective actions that address the wider system, not just the isolated event.

The available evidence strongly indicates that either such a procedure does not exist, or, if it does, it is not embedded or consistently implemented. The exceedances were not identified internally or escalated through operational meetings, and no notifications were submitted to NRW. The operator also demonstrated a misunderstanding of notification triggers, believing exceedances from composite samples were "not relevant" and therefore not notifiable. There appears to be no internal governance mechanism to ensure that breaches of emission limits or monitoring failures automatically generate a regulatory notification, as required by the permit. These issues point to either the absence of an adequate notification process or a failure to implement it, both of which constitute management system non-compliance.

Action 2: To fully determine the extent of the EMS failure in relation to regulatory notifications, NRW now requires Tradebe to undertake its own internal investigation into the adequacy and effectiveness of its management system. This should include a detailed review of the EMS sections

dealing with incident management, non-conformance, monitoring, and communication, with particular emphasis on whether a dedicated Regulatory Notification Procedure exists and is being followed in practice. Tradebe must identify any procedural gaps, governance weaknesses, or training deficiencies that have contributed to the missed exceedances and failure to notify NRW, and set out the corrective and preventative measures it will implement to ensure full compliance with permit requirements, including Condition 4.3.1(b). Completion of this review, along with evidence of improvements, should be provided to NRW by the **13th of March 2026**.

AOX – Assessment of 2025 Monitoring and Compliance Position

A review of all emissions-to-sewer monitoring undertaken by Tradebe in 2025 shows multiple exceedances of the Adsorbable Organic Halogens (AOX) emission limit value (ELV). As agreed and recorded in compliance report CAR_NRW0045335, AOX must be monitored monthly, with monitoring results submitted in accordance with permit condition 3.5.1 every six months. In 2025, however, Tradebe submitted monitoring data quarterly.

1. AOX Results Reported in 2025 Quarterly Returns

The following AOX concentrations were taken from Tradebe's quarterly monitoring submissions:

- Q1 – 13/01/2025: 2.09 mg/l
- Q2 – 08/04/2025: 3.11 mg/l
- Q3 – 13/09/2025: 2.38 mg/l
- Q4 – 14/10/2025: 1.90 mg/l

Each of these values exceeds the AOX ELV and therefore represents a breach.

2. ALS Data Presented During the Compliance Visit (21st January 2026)

During the compliance inspection on 21/01/2026, NRW were provided with four certificates of analysis for Tradebe's effluent. The following AOX results were observed:

- Sample received 31st May: 3.11 mg/l
- Sample received 31st May: 1.71 mg/l
- Sample received 13th September: 2.38 mg/l
- Sample received 13th December: 1.36 mg/l

3. Data Presented in Schedule 5 Notices by Tradebe

11th September 2025:

- 08/04/2025 3.11 mg/l

30th September 2025:

- 15/09/2025 2.38mg/l

7th January 2026:

- 09/09/2025 4.35mg/l
- 14/10/2025 1.9 mg/l (Same sample as 14/10/2025 above)
- 11/11/2025 1.52 mg/l
- 09/12/2025 1.36 mg/l (Same sample as 13th December above)

The May (3.11 mg/l) and September (2.38 mg/l) results reported by ALS align with the values included in the quarterly returns. The remaining two results were not included, which is likely due to the reporting rules on the forms used by Tradebe. These require operators to report the maximum value obtained during the reporting period (or the minimum where the ELV is expressed as a minimum), expressed in the same terms as the ELV. Where an ELV is expressed as a range, the operator must report the *minimum–maximum* measured values. It is therefore assumed that the two omitted results were not the highest values in their respective quarters.

Tradebe submitted the Q3 monitoring return for AOX; however, the result reported (2.38 mg/l) was not the highest AOX value measured during that reporting period. Monitoring undertaken on 09/09/2025 recorded an AOX concentration of 4.35 mg/l, as notified separately via a Schedule 5 submission (07/01/2026). This value was the highest measured in the quarter but was not included in the quarterly return, which listed only the lower value of 2.38 mg/l.

Permit Condition 4.2.3(c) requires the operator to submit monitoring reports using the specified NRW forms and to provide all information required by those forms, including reporting the maximum measured value where this is the reporting requirement.

By failing to include the actual highest AOX concentration recorded, the operator submitted incomplete and incorrect monitoring data, contrary to both the reporting instructions and Permit Condition 4.2.3(c). This constitutes a failure to provide complete and accurate monitoring information for the reporting period and hence is considered a breach of permit condition 4.2.3(c). **Consequently, Tradebe are being issued with a category 4 noncompliance against permit condition 4.2.3**

4. Compliance Scoring Under NRW's Regulatory Framework

NRW's compliance framework states that one non-compliance is recorded for each ELV breached within a quarter, regardless of how often monitoring is carried out or when the breach occurred within that reporting period. Based on this principle, Tradebe breached the AOX ELV in every quarter of 2025.

Two of these breaches (Q2 and Q3) have already been recorded and assessed in CAR_NRW0050273. Therefore, only Q1 and Q4 remain to be assessed and recorded.

5. Environmental Risk

Many synthetic AOX compounds are persistent organic pollutants (POPs), characterised by long environmental half-lives and resistance to biodegradation. Key environmental concerns regarding

AOX emissions include; accumulation in surface waters, sediments, soils, and the wider food chain. Some AOX species are toxic, mutagenic, or carcinogenic to aquatic organisms and humans. Documented effects include carcinogenic outcomes in fish and zooplankton, endocrine disruption, and developmental or reproductive harm. Conventional wastewater treatment provides only partial removal of AOX. As a result, a significant fraction passes through treatment processes into receiving waters, with some also partitioning into sewage sludge. Given these properties, strict regulation of AOX discharges is essential to prevent long-term environmental harm.

6. Compliance Determination

In line with NRW's scoring principles:

- Each breach is assessed on its reasonably foreseeable environmental impact.
- AOX ELV exceedances are categorised as Category 3 (Minor) non-compliances, as they have the potential for minor environmental impact but still require corrective action.
- Non-compliance scores cannot be consolidated across different quarters; each quarter represents a separate reporting period.

Based on the above, **two Category 3 non-compliances are being issued for breaches of permit condition 3.1.2**, relating to:

- Q1 2025 AOX ELV exceedance
- Q4 2025 AOX ELV exceedance

These will be recorded as separate non-compliances in accordance with NRW's consolidation rules for periodic monitoring.

At this stage, NRW remains unable to confirm whether every monthly composite sample has exceeded the permit AOX limits; however, evidence to date shows that more than half of the samples taken have been non-compliant. NRW also notes that the required notifications were not submitted when these exceedances occurred, despite this being a clear permit requirement (discussed previously). Although Tradebe has recently started submitting these Schedule 5 notifications, earlier notifications had to be actively chased by NRW. The non-compliance relating to poor notification practices has already been captured above.

Going forward, Tradebe must inform NRW as soon as they become aware of any exceedance or breach, and this notification must be submitted in the form of a Schedule 5 notice, as required by the permit.

Tradebe is required to take action to return the installation to compliance. NRW has reviewed Tradebe's proposal to install a tertiary AOX polishing system consisting of sand filtration followed by lead-lag GAC vessels. As activated carbon adsorption is an established BAT technique for the removal of AOX and other halogenated organics, it is not considered novel or innovative and cannot be authorised under NRW's waste trials mechanism. Because the current permit does not include GAC within the operating techniques, the proposed treatment can only be introduced through a formal permit variation supported by revised operating techniques, an environmental risk assessment, updated

monitoring arrangements and confirmation of BAT.

Given the ongoing AOX exceedances, NRW is willing to allow early commissioning of the new treatment system, provided that Tradebe submits a permit variation application and agrees to a six-month Voluntary Improvement Plan (VIP) containing clear milestones, contingency actions, enhanced monitoring, monthly performance reporting, and NRW site verification visits. Early operation would apply only for the duration of NRW's determination of the permit variation, and NRW may suspend compliance scores during this period. Subject to these requirements being met, early use of the system is considered a proportionate and environmentally protective approach to reducing AOX emissions while ensuring appropriate regulatory control remains in place. NRW now awaits confirmation that a permit variation application has been submitted, along with a detailed six-month VIP for approval.

Where NRW identifies non-compliance, we are required to ensure that the operator investigates and establishes the root cause. Tradebe must therefore investigate and explain the significant increase in AOX ELV exceedances observed during 2025 compared with previous years. Therefore, NRW considers action 24 from compliance report CAR_NRW0050273 still pertinent and requires completing.

CAR_NRW0050273 Action 24: Please provide a detailed root cause investigation into the AOX exceedances recorded in 2025, including contributing factors, operational or process changes, and any corrective or preventative measures identified. **Response due 13th March 2026.**

With regards to action 25 of compliance report CAR_NRW0050273, NRW have made a revision to the monitoring requirements in Table 3 of that report .Therefore, NRW expects the following monitoring to take place:

Table 3

Parameter	Frequency
Daily Discharge	Continuous
Peak Flow Rate	
pH	Once every day
Adsorbable Organically Bound Halogen (AOX)	Weekly
Temperature	Once every day
Free Cyanide (CN ⁻)	Once every day
Arsenic (As)	Once every day
Cadmium (Cd)	Once every day
Chromium (Cr)	Once every day
Copper (Cu)	Once every day

Nickel (Ni)	Once every day
Lead (Pb)	Once every day
Zinc (Zn)	Once every day
Mercury (Hg)	Once every day until their 12 week investigation is complete
Hexavalent Chromium (Cr(VI))	Once every quarter
Benzene, Toluene, Ethylbenzene, Xylene (BTEX)	Once every quarter
Hydrocarbon Oil Index (HOI)	Once every quarter
PFOA	Once every six months
PFOS	Once every six months

With regards to action 23 of compliance report CAR_NRW0050273 this is copied below **and still needs completion.**

Action 23: Please provide a Schedule 5 Notice with the completed part B section for both AOX exceedances stating your measures taken, or intended to be taken, to prevent a recurrence of the incident.

Periodic Groundwater and Soil Monitoring (permit Condition 3.1.4)

During the meeting held on the 21st January, Actions 26 and 27 from compliance report CAR_NRW0050273 were discussed with Tradebe. The operator requested additional time to review and analyse the next set of groundwater and soil monitoring data before progressing the agreed actions.

NRW has agreed to temporarily suspend the deadlines for Actions 26 and 27. The position will be reviewed at the end of March to assess Tradebe's progress and determine the appropriate next steps.

Tradebe 2025 End of Year Report

In accordance with permit condition 4.2.2, the operator is required to submit a report, or reports, to Natural Resources Wales by 31st January each year (or on another date agreed in writing with Natural Resources Wales). These reports must include, as a minimum: (a) a review of the results of all monitoring and assessment undertaken in accordance with the permit, including an interpretive assessment of that data; (b) the annual production and treatment data specified in Schedule 4, Table S4.2; and (c) the performance parameters listed in Schedule 4, Table S4.3, submitted using the reporting forms specified in Table S4.4 of that schedule.

Tradebe is required to provide annual reports in line with condition 4.2.2. Although Tradebe submitted

most of the returns within the deadline, the water usage data was missing and was submitted late on the 10th of Feb 20206. As the completed returned were not submitted until after the 31st January deadline, **A category 4 non-compliance is being issued against permit condition 4.2.2c.**

A review of the information in Tradebe's performance report for 2025 identified the 'Trade Effluent Discharges' section to be factually incorrect. This description did not reflect the monitoring approach agreed with NRW or the requirements set out in Schedule 3 of your permit. As confirmed during previous compliance discussions, including those recorded in CAR_NRW0046371, Tradebe has moved away from quarterly composite sampling for daily and batch-based determinands and is required to undertake randomised 24-hour or single-batch composite sampling, in line with the Waste Treatment BREF and the monitoring requirements associated with emission point S1. Because this report forms part of the public register and must accurately describe the monitoring undertaken in accordance with permit condition 4.2.2(a), NRW required Tradebe to amend the report accordingly. This means the information submitted does not accurately describe the monitoring actually carried out in accordance with the permit, and therefore does not meet the requirements of permit condition 4.2.2(a). The incorrect information also forms part of the public register and must be accurate.

This represents a failure to provide a compliant interpretive review and is therefore recorded as a **Category 4 non-compliance against condition 4.2.2(a)**. Tradebe provided an updated version on the 10th of February 2026 which has been accepted.

A review of the information submitted has been undertaken and compared with data from previous years to provide appropriate context and to assess year-on-year performance. The multi-year data for Tradebe Cardiff, covering the period from 2019 to 2025, shows several notable operational and environmental trends relevant to ongoing regulatory oversight. Waste throughput has generally increased over time, rising from 27,910 tonnes in 2019 to a peak of 37,547 tonnes in 2025, which provides important context for evaluating the efficiency trends seen across key indicators. Despite the higher waste volumes handled in recent years, Tradebe has achieved clear improvements in some areas while performance in others has been more inconsistent.

Electricity use per tonne of waste treated has improved significantly over the reporting period. Specific electricity consumption has fallen from 3.21×10^{-3} MWh per tonne in 2019 to around 1.8×10^{-3} MWh per tonne in both 2023 and 2025, representing some of the most efficient years in the dataset. This consistent reduction, even during years when throughput was at its highest, suggests ongoing optimisation of site processes and energy control systems. These results indicate a positive overall direction of travel and do not point towards any emerging energy-related compliance concerns.

Raw material usage presents a more mixed picture, with efficiency generally improving but showing notable spikes in certain years. The specific use of ferric chloride and polyelectrolyte shows a pronounced increase in 2022 and again in 2024, reaching 9.79×10^{-4} and 8.03×10^{-4} tonnes per tonne of waste treated respectively. However, both 2023 and 2025 show markedly improved performance, with values around 3.78×10^{-4} and 3.75×10^{-4} , which are the lowest across the full dataset. These improvements suggest that the site has restored dosing efficiency following those peak years.

Residue generation has shown a gradual upward trend from 2019 onwards, increasing from 3.63×10^{-3} tonnes of residues per tonne of waste treated to peaks of 1.07×10^{-2} in 2022 and 1.20×10^{-2} in 2024.

While the value for 2025 decreases slightly to 9.91×10^{-3} , residue intensity remains higher than earlier years and may reflect shifts in feedstock composition, changes in process efficiency, or underlying operational constraints. Continued observation is appropriate, as increasing residue output can indicate reduced recovery efficiency or pressures on waste minimisation systems.

Sludge generation and oil recovery show contrasting trends. Sludge production per tonne of waste treated has steadily improved since 2021, falling from 7.93×10^{-3} to 2.58×10^{-3} in 2025, the lowest value reported across all years. This reduction supports waste minimisation objectives and suggests enhanced control of solids separation processes. Conversely, oil recovery efficiency fell sharply in 2025 after a very strong performance in 2024, where 8.10×10^{-3} tonnes of oil were recovered per tonne treated. In 2025, this figure dropped to 2.32×10^{-3} . This change may reflect differences in oil content of incoming waste rather than process changes.

Freshwater use showed a slight increase between 2023 and 2024, rising from a specific usage of 0.0265 m^3 per tonne in 2023 to 0.0284 m^3 per tonne in 2024. The 2025 data now submitted shows a reduction in specific usage to 0.0208 m^3 per tonne, indicating an improvement in water-use efficiency relative to both preceding years.

The ratio between wastewater treated onsite and effluent discharged to sewer remains relatively stable across all years, generally close to 1.0. This consistency indicates stable operation of wastewater treatment systems, with no evidence of significant deviations that could indicate system stress or under-performance.

Taken together, the data shows a broadly positive trend in energy efficiency, raw material efficiency in most years, and sludge minimisation.

Waste returns

The waste returns for 2025 have been reviewed. NRW's review of the quarterly waste returns submitted for Q2 and Q3 has identified that the figures provided for all EWC codes are identical across both reporting periods. This strongly indicates that the data submitted for at least one of these quarters is incorrect and does not accurately represent the waste accepted or removed from site during those periods. Under permit condition 4.2.5, the operator is required to submit accurate quarterly information on waste received and removed from the installation, using the form specified by Natural Resources Wales. The duplication of data therefore constitutes a failure to meet this reporting requirement.

Additionally, this error calls into question the adequacy of the operator's internal controls and record-keeping processes. The submission of duplicated quarterly returns is inconsistent with permit requirements, and this failure has been assessed as a non-compliance under compliance criterion IR4B – Reporting. In line with NRW's compliance classification guidance, the reasonably foreseeable impact of incorrect reporting has been assessed as a category 4 minor non-compliance against condition 4.2.5, unless subsequent information demonstrates that the error conceals or contributes to more significant compliance risks.

Action 3: Tradebe are therefore required to review the Q2 and Q3 returns in full, identify the cause of the error, and resubmit corrected data. Tradebe must also provide an explanation of the steps taken to ensure that future reporting processes are robust and prevent similar

occurrences. **Due 13th March.**

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.