

Compliance Assessment Report CAR_NRW0052111

Permit being assessed: CB3595HE.

For: Royal Mint Combined Heat and Power Facility, **held by:** Infinite renewables Group Limited

At: The Royal Mint, Llantrisant, Pontyclun, CF72 8YT.

Type of assessment: Audit,

Reason: Routine.

On: 15/06/2026.

Parts of permit assessed: 1.1.1.

NRW Lead Officer: Geraint Harris.

Report sent to: Operations Coordinator, Operations Coordinator, on 15/06/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Action only (X)	

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?

Criteria	Action needed	Complete by
IR1A	Please response to the actions in the main text by the 21st September 2026.	21/09/2026

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.

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

Royal Mint Combined Heat and Power Facility EMS Audit

The Environment Agency's guidance on management systems for environmental permits recognises that the level of detail should be proportionate to the complexity and risk of the activity. In this context, given the nature of the CHP plant and the potential environmental risks (particularly emissions to air), we would expect to see a management system that not only defines procedures, but also demonstrates how environmental risks are actively managed in practice.

For the purposes of our audit, we therefore need to see evidence that the Environmental Management System (EMS) is being implemented and is effective in controlling environmental impacts. This does not necessarily require full ISO 14001 certification; however, the system should reflect the key principles of a structured, risk-based EMS.

In practical terms, this means providing evidence of how the system operates in practice, rather than just documented procedures. This would typically include, where relevant and proportionate to the activity:

- Identification and assessment of environmental aspects and risks
- Arrangements to ensure compliance with permit conditions and relevant legislation
- Monitoring and review of environmental performance (e.g. emissions)
- Records demonstrating that controls and procedures are being implemented
- Arrangements for reviewing performance and identifying improvements
- Evidence of actions taken to address issues and improve environmental outcomes

Accordingly, we are looking for completed records, outputs, and examples of implementation, rather than procedures alone.

The documentation received to date demonstrates that procedures and controls are defined. However, further evidence is required to demonstrate that the EMS is operational, embedded, and effective in practice, in a manner proportionate to the risks posed by the activity.

Action 1: Provide the most recent EMS certificate such as ISO 14001, if applicable.

Action 2: Provide evidence that your EMS satisfies (as a minimum) the following guidance:

[Develop a management system: environmental permits - GOV.UK](#)

Both MCPD and Environment Agency guidance require monitoring to produce “reliable, representative and comparable results.” In this context, NRW requires further clarity on how robustness and representativeness of emissions monitoring is ensured.

In particular, further information is required on how the operator ensures that:

- Third-party emissions monitoring is conducted under conditions representative of normal plant operation
- Plant load and operating profiles during testing reflect typical operating regimes and permit assumptions
- Controls are in place to prevent non-representative test conditions, including load reduction during monitoring
- Testing contractors are subject to appropriate oversight and verification, including:
 - Confirmation of MCERTS accreditation and scope
 - Review of sampling methodologies and test conditions
 - Verification that testing is undertaken under stable, steady-state conditions
- Emissions data generated by third parties is subject to internal quality assurance, including review of:
 - Process conditions during testing (e.g. load, fuel input, oxygen levels)
 - Alignment with normal operational data (e.g. SCADA trends)
 - Any anomalies or deviations from expected performance

Strengthening arrangements in this area would improve confidence that monitoring results are reliable and representative, in line with regulatory expectations.

Action 3: Please provide documentation demonstrating how CHP operation and emissions are controlled in practice, including:

- Defined controls for:
 - normal operation
 - start-up and shutdown conditions
- Roles and responsibilities between the site operator and contractors
- How operational control is maintained where activities are outsourced

Action 4: Building on the monitoring data already provided, please clarify and provide:

- The monitoring plan or programme (parameters, frequency, responsibilities)
- How monitoring requirements are defined, including contractor arrangements
- Processes for:
 - emissions monitoring and reporting

- evaluation against ELVs

- Evidence of:

- review of monitoring results
- compliance assessments

Action 5: Provide evidence of how monitoring data is validated and assured, including:

- Definition of representative operating conditions during testing
- Evidence that plant load during testing reflects normal operation (e.g. engine parameters such as air:fuel ratio, ignition timing where relevant)
- Controls to ensure testing is representative
- Contractor competence (e.g. MCERTS accreditation/scope)
- Internal review of monitoring reports, including:
 - operating conditions
 - consistency with plant data
 - investigation of any anomalies

Action 6: Please demonstrate how emissions data is used in practice, including:

- Trending or review of results over time
- Use of data to optimise plant performance
- Links to maintenance, operational control, or emission reduction
- Any connection to objectives, targets, or improvement actions

Action 7: Provide details of the EMS is used to manage environmental incidents and non-conformities, including:

- How incidents/non-conformities are identified, recorded, and categorised
- Criteria for regulatory notification (e.g. NRW reporting)
- Root cause investigation processes
- Corrective and preventive actions
- How actions are tracked, closed, and verified
- How learning and improvements are captured and shared

Action 8: Provide evidence of how the EMS is evaluated and maintained, including:

- Internal audit programme and completed audits

- Management review records (if undertaken)
- Processes for evaluating compliance with permit and legal requirements
- How EMS performance is reviewed and improvements identified

The documentation received demonstrates that procedures and controls are defined, but further evidence is required to demonstrate that the EMS is fully implemented, operational, and effective in practice.

Please respond to the following actions by the 21st September 2026.

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.