Cyfoeth Naturiol Cymru
Natural Resources Wales

Compliance Assessment Report CAR_NRW0052119

Permit being assessed: BV5858IW.

For: Abril Industrial Waxes, **held by:** Abril Industrial Waxes Ltd

At: Sturmi Way, Village Farm Ind Estate, Pyle, Bridgend, CF33 6BZ.

Type of assessment: Report/Data Review,

Reason: Other.

On: 16/06/2026.

Parts of permit assessed: Climate Change Risk Assessment CCRA.

NRW Lead Officer: Richard Taylor.

Report sent to: Operations Manager, Operations Manager, on 17/06/2026.

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	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Climate Change Risk Assessment

We received the 'Abril Industrial Waxes Ltd Climate Change Risk Assessment' (CCRA) before the deadline. Thank you for submitting this on time. We now carried out a light-touch review following NRW guidance and are mainly satisfied that the assessment meets our current CCRA requirements under Regulation 61 and permit condition 1.1.1(a). There are several areas where the assessment goes beyond the current scope of the Requirement, and some areas where it could be improved further. These are listed below for clarity. As this is a live document it will be important to consider the remarks here for inclusion at the next uplift. We will shortly be contacting you regarding the next phase of the development of the CCRA plan.

The Abril CCRA is technically advanced, but has some areas which could be deepened and improved to fully meet with NRW compliance expectations. It has a strong methodology, structure, and a corporate-level analysis, but lacks on site-specific risk linkages, proportionality, and actionable adaptation planning.

1. Hazard Identification

There are several good points raised;

- A comprehensive hazard framework (temperature, wind, water, solid mass) which covers both acute (storms, floods, heatwaves), and chronic (temperature change, water stress).
- The CCRA uses IPCC-aligned taxonomy and a wide hazard list.

2. Use of Climate Projections / Forward Look

There is good use of IPCC scenarios (SSP4.5, 7.0, 8.5) in the CCRA. Time horizons (short / medium / long term) have been identified, and a full future risk escalation analysis has been carried out.

3. Risk Assessment Methodology used

There is a clear scoring system employed using Exposure (1–5) and Vulnerability (1–5)

A defined materiality threshold used (≥10) with good use of GIS datasets + structured vulnerability scoring is in place.

4. Site-Specific Risk Context

There is some site-specific commentary (e.g. coastal exposure, warehouse flood risk)

However, there are some shortfalls which could be considered for the CCRA.

There is no clear use of: NRW flood maps, local drainage/flood zone data, or groundwater vulnerability, Nearby receptors (watercourses, sensitive habitats) have not been identified in sufficient detail. Geographic reasoning is also set at a high company level and is too generic. It is more effective to be site specific and based upon on local datasets. Identified risks would e improved if they were clearly linked to actual site conditions.

5. Climate Hazards and Environmental Risk

Some shortfalls have been identified where the CCRA does not clearly connect climate hazards to permit-relevant consequences, such as:

- Pollution releases (e.g. flooding → loss of containment)
- Emissions breaches (e.g. heat → VOC control failure)
- Sewer overflow / contaminated runoff
- Fire/explosion risks from temperature changes
- Abatement system failure during storms

At present the CCRA is currently focussed on general business disruption, and financial impacts. An improvemet would be to include the comments above into the CCRA and link them to how climate change could affect the sites ability to comply with its environmental permit conditions.

6. Adaptation Measures

There is a good range of suggested adaptation measures, including nature-based solutions, engineering controls, and operational measures. However, further information could be included on measures which are: Generic (not site-specific), and not tied to specific scored risks. Additionally the adaptation measures identified should have ownership/assigned to somebody, have timescales, have a prioritisation, costing, and implementation status.

An example of this would be “Install barriers or floodwalls”. At present there is no confirmation of whether this is required, where it would go, or when it would be in place. Adaptation must be actionable and clearly linked to the identified risks.

7. Evidence of Existing Controls / Preparedness

At present this area is limited and could be developed further. There is some acknowledgement of site cooling systems, and safety procedures. However, there is limited detail on containment systems, drainage controls, and emergency response.

8. Integration into Management System

The CCRA forms part of the Management system and is integrated into it. At present there is a gap with links to the environmental permit conditions. NRW woud expect clear embedding into management system and day-to-day operations.

9. Monitoring, Review, and Governance

The CCRA would benefit from having a stated review frequency with listed events which could trigger a review (e.g. post-incident). No Key performance indicators have been used in the CCRA (KPI's). Additionally the responsible person for the review should be identified.

10. Over-Complexity vs "Light-Touch" Requirement

Ironically, the CCRA was found to be complex in modelling, but weak in its practical application. There is a reliance on GIS modelling and global datasets, but Insufficient focus on practical site risks, and simple site specific demonstrable controls.

11. Conclusion

The CCRA is technically robust but need to demonstrate climate resilience under its environmental permit. The measures listed should be used in the upcoming review as a means to improve the CCRA further as a living operational document. Site should consider improving;

1. Site-specific risk addendum
2. Flood maps, drainage, infrastructure
3. Site specific pollution pathway analysis
4. Climate hazard → pathway → receptor → impact
5. Detailed adaptation plan
6 Actions, owners, deadlines, KPI's
7. Integration into EMS
8. Procedures, maintenance, contingency plans
9. A review timeline / framework
10. References to sector guidance documents referenced when compiling the CCRA.

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.