

Mr. Richard Lewis
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CF34 9RS

**Our ref: PAN-030973
Your ref: EPR/EP3738NG**

Date: 02 July 2026

Sent via email to: richard.lewis@wepa.co.uk

**Application reference: PAN-030973 (EPR/EP3738NG/V007)
Operator: WEPA UK Ltd
Facility: Bridgend Paper Mill, Llangynwyd, Maesteg, Bridgend, Mid Glamorgan, CF34 9RS**

Dear Mr. Lewis,

Thank you for your application, submitted to us on 19/11/2025. We need to ask you for some more information before we can consider duly making your application.

We have provided further information below as to why we have made this request. Our request has been made in line with the following guidance: [Regulatory Guidance Note 3](#) and [Environmental Permitting: Core Guidance](#).

In line with the guidance we consider:

- An application is duly made if it contains the required components and sufficient information for it to begin to be determined.
- Paragraph 12(1) of Schedule 5 of EPR states that the regulator must grant or refuse a duly made application, therefore an application must be capable of being determined in order to be duly made.
- Applications should give all the information the regulator needs to make a determination.
- We complete a basic technical assessment to decide if there is sufficient information for us to determine the application. If it is clear after the basic technical assessment that we need significant additional information to determine the application, we consider the application not duly made. For example if there is substantial and obvious doubt over the basic adequacy of a key part of the application (e.g. environmental risk assessment) we consider the application not duly made.
- Specifically regarding information notices (Schedule 5 Notices during the determination phase) the guidance states they are not a way of repairing an

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Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

application that should not be duly made in the first place and we aim to serve only one Schedule 5 Notice.

We do not consider your application complete and capable of being determined as there are substantial parts of the application missing.

The additional information requested is summarised below:

1. Action: Provide an integrated timeline of Vesta commissioning and start-up, and Jupiter decommissioning.

It is unclear from the documentation submitted when Jupiter will be decommissioned. The timeline for this has an impact on the Vesta application and assessments.

2. Action: Provide confirmation of the installation design.

In the BAT Assessment of BAT 17 within the *EP Application Report* WEPA states that “*six months prior to the installation commissioning date, the Operator will confirm with Natural Resources Wales that the design of the installation has not changed from that submitted as part of the Noise Assessment.*”

3. Action: Confirm the maximum percentage of broke fibre to be used in Vesta.

Section 4.5 of the *EP Application Report* provides recycled material percentage but indicates both 30% and 100% are feasible. Confirmation of the maximum percentage WEPA intends to run in Vesta is needed.

4. Action: Provide a site plan which consolidates the required changes and shows all emission points (include list of emissions points).

Two site plans were submitted as appendices to the application (Appendices 21.2). Consolidate the two site plans and emission points, current and proposed, into a single site plan showing all emission points within the site boundary (marked in green).

5. Action: Confirm if any of the DAAs listed in your permit will change due to the installation and/or operation of Vesta.

Provide written confirmation of the existing Directly Associated Activities (DAAs), identifying any that will change and how.

6. Action: Provide a consolidated environmental risk assessment.

In line with [Natural Resources Wales / How to carry out a risk assessment for an Environmental Permit](#) the environmental risk assessment should identify and consider risks for your site. The initial assessment should utilise the source pathway receptor approach for the operational and decommissioning phases. In addition to the main environmental risks, fugitive emissions should be included.

It is noted that an environmental risk assessment is included in the *EP Application Report* and a copy of the *Environmental Statement VESTA 18-0302025* was received as appendix 27.1. However, these do not follow the required approach and do not provide a complete assessment of environmental risks required for the permit application.

7. Action: Provide the Habitats Risk Assessment (HRA) referenced in the application documents.

Provide a copy of the HRA submitted with the Planning Application noted as document ref 59200-0050 in Appendix 27.1 *Environmental Statement VESTA 18-0302025*.

8. Action: Provide a risk assessment of emissions to air and air quality modelling results.

The H1, or equivalent, air emissions risk assessment must cover total site-wide impacts while explicitly detailing the specific changes caused by the addition of Vesta. See [Risk assessments for specific activities: environmental permits - GOV.UK](#) for guidance and available tools.

Given the addition of point sources for emissions to air it is likely WEPA will then need to undertake air quality modelling after completion of the H1 risk assessment. See [Air emissions risk assessment for your environmental permit - GOV.UK](#) for guidance and available tools.

9. Action: Provide an updated BAT assessment which provides technical detail as to which applicable BATc conclusions are applied and an assessment of any relevant secondary BAT conclusions.

A BAT assessment was provided in Section 6.2 of the Document *Application for a Variation to Environmental Permit Number EPR/EP3738NG* and although supporting information has been provided via appendices and references to other sections within the application document it does not provide sufficient clarity.

The assessment should identify which BAT conclusions apply to each specific activity and how WEPA will follow that BAT conclusion, including how any specified BAT-associated emission level will be met. If BAT is not applicable the reason should be stated in the assessment. If BAT is not going to be followed, justification should be included in the BAT assessment.

Secondary BAT can be found in the relevant horizontal BREF and BAT documents.

10. Action: Provide further information on the basis of the noise model.

- a. Confirm if the noise assessment modelling is based on ISO9613:1996 or ISO9613:2024.
- b. If the model was based on ISO9613:1996 it needs to be re-modelled to ISO9613:2024 and re-submitted for the purposes of this application.
- c. Provide evidence of the competency of the persons that completed the modelling.

For further guidance refer to [Noise and vibration management: environmental permits - GOV.UK](#).

11. Action: Provide a chemical inventory, including chemical names and maximum quantities to be stored within the Vesta development.

The Pulp and Paper BATc and CIRIA736 are applicable and should be considered when completing this action. Include descriptive specifics of the containment systems to be used for each named chemical to support interpretation of the appendices provided with the application. If a chemical to be used meets or does not meet BAT indicate this in the chemical inventory.

12. Action: Provide a copy of the latest version of the Fire Prevention Management Plan (FPMP).

It is noted that two design documents related to fire prevention were submitted. Please submit the overall FPMP as well. If necessary, see [Natural Resources Wales / Fire prevention and mitigation plans](#) and consider the *Confederation of Paper Industries Guidance*.

13. Action: Provide an updated accident management plan

Vesta introduces significant structural change to the WEPA site. An updated accident

management plan is required. See How to Comply with your Environmental Permit guidance <https://cdn.cyfoethnaturiol.cymru/680335/how-to-comply-with-your-environmental-permit.pdf>.

14. Action: Update the OPRA Spreadsheet to reflect all existing and planned activities, including DAAs, permitted emission points and planned emission points.

The OPRA spreadsheet and subsequent score should include all activities on site, including proposed activities and emissions points per the VESTA application. Guidance and the latest OPRA spreadsheet V2.6 2026/27 can be found here: [Natural Resources Wales / Our charging schemes](#).

15. Action: Submit ISO50001 Certificate OR Energy Balance for site, including Vesta.

Section 4.8 of the *EP Application Report* outlines energy efficiency measures that WEPA intends to utilize, and reference is made to ISO50001. For clarity either provide ISO50001 certificate or an energy balance taking account of this guidance - [Energy efficiency standards for industrial plants to get environmental permits - GOV.UK](#).

16. Action: Provide the current ISO14001 certificate.

We recognise that this application was submitted in advance of the expiry date noted on the certificate. Please provide the current certificate as evidence that an EMS is in place.

17. Action: Submit an amended Form C3.

A typographical error on question 3c on Application Form C3 refers to Neptune rather than Vesta.

Please reply within 10 working days from the date of this letter. If we don't hear from you, we must return your application and fee. We will keep 14% of the charge to cover the cost of the assessment work done.

If you email or write to us, please quote the application reference **PAN-030973** on any correspondence and send it to the relevant address below. When we receive the missing items, we'll continue to check the details in your application. If there's enough there for us to begin the process of deciding whether or not we can grant your application we say the application is 'duly made' and we'll let you know this by letter. Please quote our reference if you contact us. If you have any questions, please email me at emily.lloyd@cyfoethnaturiolcymru.gov.uk.

Regards,
Emily Lloyd
Lead Specialist Permitting Officer
Installations and RSR Permitting Team