

Compliance Assessment Report CAR_NRW0052426

Permit being assessed: DP3333TA.

For: Pembroke Power Station , **held by:** RWE Generation UK plc

At: Pembroke Power Station , Pembroke, PEMBROKE, Dyfed, SA71 5SS.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 20/07/2026.

Parts of permit assessed: Condition 2.4.1, Table S1.3, Improvement Condition 8.

NRW Lead Officer: Alex Bowder.

Report sent to: RWE Generation UK plc, Environmental Engineer, on 20/07/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2E - Installations - Operations - Improvement programme	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

Improvement Condition 8 - Review of Black Start Response Plan

The operator has submitted the following documents to discharge the requirements of Improvement Condition 8 (IC8):

- **Black Start Response Plan (October 2020)**

Condition 2.4.1 from the permit variation EPR/DP3333TA/V005 states:

“The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by Natural Resources Wales.”

The Improvement Condition 8 in schedule 1, table S1.3 specifies:

IC8	The operator shall produce and submit a written Black Start Response Plan to Natural Resources Wales, for approval. The plan shall contain an impact assessment demonstrating that there is no significant environmental risk associated with black start operations and: • propose a methodology for minimisation of environmental impact during such a period of operation; and • include the procedure for the notification of black start operation and its duration. The methodology for operation and reporting set out in the report shall be implemented by the Operator from the date of approval by Natural Resources Wales.	02/01/2021
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Commentary

The plan explains that Black Start Events are rare but significant electricity system failures where National Grid ESO may instruct generating plant to operate in order to restore and stabilise the electricity network. During such events, plant may be required to operate outside its normal optimised conditions, including circumstances where emissions abatement systems are not fully effective or where plant loading profiles differ from normal operation. As a result, temporary exceedances of permit emission limit values (ELVs) may occur.

Environmental Impact Assessment

In response to the first requirement of IC8, the report contains an environmental impact assessment drawing upon an industry-wide study commissioned for UK environmental regulators. The assessment considered a range of plant types and Black Start scenarios,

including gas-fired CCGTs, OCGTs, biomass and coal-fired generating units. The findings conclude that Black Start operations present either no risk or a very low risk of causing non-compliance with relevant National Air Quality Objectives. The report therefore concludes that the environmental impacts associated with Black Start Events are generally insignificant and that no significant environmental risk is posed, provided emissions remain within the assumptions of the underlying assessment.

The plan also satisfies the requirement to propose a methodology for minimising environmental impacts. Although the report notes that opportunities to reduce emissions may be limited during National Grid instructed operations, the operator commits to using best endeavours to minimise environmental impact where practicable. Measures include preferential use of units with compliant environmental performance where operationally possible, avoiding operation of units known to have abatement or combustion faults, and minimising periods of operation in higher-emission modes. The report recognises that maintaining electricity system restoration is the primary objective during a Black Start Event, but nevertheless establishes a clear expectation that environmental impacts will be minimised wherever this can be achieved without compromising grid recovery.

The report further provides a comprehensive approach to emissions reporting. It explains how emissions data associated with Black Start Events should be distinguished from normal operating emissions, how any exceedances should be recorded, and the reporting forms that should be used. This ensures transparency and consistency in the treatment of emissions arising from these exceptional operating circumstances.

Notification

In response to the final requirement of IC8, the plan includes a clear notification procedure. The regulator is to be notified within seven calendar days of the conclusion of any Black Start Event that results in excess emissions. Supporting emissions data and an air quality risk assessment are to be submitted within fourteen calendar days. The plan also sets out arrangements for annual reporting of Black Start operating hours.

Compliance Summary

Overall, the submitted Black Start Response Plan contains the environmental impact assessment, environmental mitigation methodology and notification procedures required by IC8. The report provides an established industry framework for the management and reporting of Black Start operations.

On this basis, IC8 is considered to have been satisfactorily addressed and can be regarded as complete, subject to continued implementation of the methodology and reporting arrangements set out within the approved plan.

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.