

Compliance Assessment Report CAR_NRW0052591

Permit being assessed: XP3833UB.

For: East Bank Road Facility, **held by:** G D Environmental Services Ltd

At: Unit 18a East Bank Road, Felnex Industrial Estate, Newport, South Wales, NP19 4PP.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 05/08/2026.

Parts of permit assessed: See comments section.

NRW Lead Officer: David Thomson.

Report sent to: Redacted, HR and Compliance Manager, on 05/08/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.3.1
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR4C - Installations - Information - Notification	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
2	8

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	The operator shall undertake a review of emissions monitoring and verify that all parameters specified in	28/10/2026

Criteria	Action needed	Complete by
	Schedule 3 Table S3.2 are being analysed in accordance with the permit requirements	
IR1A	The operator shall review and, where necessary, revise its written management system and emissions monitoring procedures to ensure that permit monitoring requirements are correctly implemented and verified by third-party laboratories responsible for emissions monitoring.	28/10/2026

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

Assessment Details

This Compliance Assessment Report (CAR) is a record of Natural Resources Wales' (hereafter NRW) assessment of G.D. Environmental Services Limited's (hereafter the operator) Q1 2026 (January to March) S1 reporting form for emissions to sewer against the relevant environmental permit conditions for reporting, emissions & monitoring and notifications.

Documents provided by the operator

Reference 1 – 20231211-out-GDE-WT BRef reporting forms-SEWER-JAN-MARCH26_.pdf (submission date – 01 May 2026)

Reference 2 - Schedule 5 Notification - Breach of permit conditions 01.05.26.pdf (submission date - 11 June 2026)

Assessment Structure

Compliance Criteria (e.g., IR4B, IR3A and IR4C)

- (a) Permit Condition
- (b) Compliance Assessment
- (c) Consolidation of Non-Compliance Score
- (d) Root Cause Analysis (when applicable)

IR4B – Information – Reporting

(a) Permit Condition

Environmental permit condition 4.2.3 states:

Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by Natural Resources Wales, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 3 table S3.1;*
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in*

schedule 4 table S4.3; and

(c) giving the information from such results and assessments as may be required by the forms specified in those tables.

Table S4.1 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to water Parameters as required by condition 3.3.1	S1	Every three months	01 January 01 Apr 01 Jul 01 Oct

Note – although the reporting period is once every 3 months, some parameters (i.e., PFOS and PFOA) are only monitored once every 6 months, therefore it is expected that PFOS and PFOA will be reported six monthly.

Table S4.3 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.3 Reporting forms		
Media/parameter	Reporting format	Date of form
Sewer	Form sewer 1 or other form as agreed in writing by Natural Resources Wales	17/08/2022

Note – A new sewer 1 form was issued to the operator on 11 December 2023 (Form no. sewer1 / 01/01/2024).

(b) Compliance Assessment

Point Source Emissions to Sewer – S1

The reporting form for emissions to sewer was not submitted within 28 days of the end of the reporting period (see reference 1).

However, NRW has identified an error in permit condition 4.2.3(a), which creates ambiguity regarding reporting requirements. The condition incorrectly refers to the parameters and emission points specified in Schedule 3, Table S3.1, which relates to emissions to air and contains no reporting requirements. The relevant reporting requirements are instead contained within Schedule 4, Table S4.1, which identifies the emission point, parameters and reporting period for emissions to sewer.

Consequently, NRW has not assessed this matter as a permit non-compliance and no CCS score has been applied. NRW will undertake an administrative variation to correct the error.

Compliance Classification Scheme: There are no incidents of non-compliance with permit condition 4.2.3

Justification: NA

Action: no action required

(c) Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

(d) Root Cause Analysis

NA

IR3E – Emissions and Monitoring – Monitoring**(a) Permit Condition**

Environmental permit condition 3.3.1 states

The operator shall, unless otherwise agreed in writing by Natural Resources Wales, undertake the monitoring specified in the following tables in Schedule 3 to this permit:

(a) point source emissions specified in table S3.2

Schedule 3 Table S3.2 to the environmental permit is partially reproduced below.

Table S3.2 Point source emissions to sewer – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency 1,2	Monitoring standard or method
S1 on site plan in schedule 7 (emission to public foul sewer)	Site effluent treatment plant	Hydrocarbon oil index (HOI)	10mg/l	None set	Once every day	EN ISO 9377-2

Note – Following the completion of Improvement Programme Requirement IPC17 in Schedule 1 Table S1.3 of the environmental permit, NRW have revised the emission monitoring requirements as set in Schedule 3 Table S3.2 (for details see CAR_NRW0042709 – issued 10 November 2023). Schedule 3 – Emissions and monitoring, will be updated to reflect these changes during the next permit variation.

(b) Compliance Assessment

The operator did not undertake monitoring of hydrocarbon oil index at emission point S1 in Q1 2026 which represents non-compliance with the environmental permit.

On 24 April 2026, NRW received a query from the operator regarding discrepancies between the emission limit values specified in the environmental permit and the discharge limits specified in the Dwr Cymru Welsh Water trade effluent consent.

Following a review of the issue and an online meeting with the operator on 01 May 2026, it was identified that monitoring of HOI (Hydrocarbon Oil Index) was not being carried out as specified in Schedule 3 Table S3.2 of the environmental permit.

Instead, the third party laboratory responsible for analysing monthly effluent samples was measuring EPH (Extractable Petroleum Hydrocarbons) which was mistakenly being reported as HOI by the operator. Whilst both parameters relate to petroleum hydrocarbons, they require distinct analytical tests and are not directly interchangeable. The duration of this reporting error is unknown.

On 11 June 2026, the operator submitted a Schedule 5 Part B notification explaining that the root cause of the non-compliance was human error and that a new third party laboratory had been appointed to undertake the required analysis (see reference 2).

Compliance Classification Scheme (CCS): As a result of the non-compliance with permit condition 3.3.1, a CCS score [C3] has been recorded against compliance sub-criteria IR3E – Emissions and Monitoring – Monitoring.

Justification: A C3 score has been levied as it is reasonably foreseeable that the failure to monitor HOI could have have a minor impact or effect on the environment.

Action: The operator shall undertake a review of the emissions monitoring programme and verify that all parameters specified in Schedule 3 Table S3.2 are being analysed in accordance with the permit requirements.

(c) Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

(d) Root Cause Analysis

NRW has determined that the failure to ensure that monitoring is undertaken in accordance with the requirements of the environmental permit, including verification that the correct parameters are being analysed and reported, is attributable to a management system failure. This represents a breach of environmental permit condition 1.1.1 which states:

The operator shall manage and operate the activities:

(a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and

(b) using sufficient competent persons and resources.

Compliance Classification Scheme (CCS): As a result of the non-compliance with permit condition 1.1.1, a CCS score [C3] has been recorded against compliance sub-criteria IR1A – Management – General Management.

Justification: A C3 score has been levied as it is reasonably foreseeable that a management system failure could have a minor impact or effect on the environment.

Action: The operator shall review and, where necessary, revise its written management system and emissions monitoring procedures to ensure that permit monitoring requirements are correctly implemented and verified by third-party laboratories responsible for emissions monitoring.

IR3A (1) – Emissions and Monitoring – Emissions to Water**(a) Permit Condition**

Environmental permit condition 3.1.2 states:

The limits given in schedule 3 shall not be exceeded.

(b) Compliance Assessment

Emissions monitoring data submitted by the operator on 01 May 2026 demonstrates that all measured parameter results were within the permitted emission limits which represents compliance with the environmental permit.

Compliance Classification Scheme (CCS): There are no incidents of non-compliance with permit condition 3.1.2.

Justification: NA

Action: no action required

(c) Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

(d) Root Cause Analysis

NA

IR4C – Information – Notification**(a) Permit Condition**

Environmental permit condition 4.3.1 (b)(i) states:

*(b) in the event of a breach of any permit condition the operator must immediately
(i) inform Natural Resources Wales*

Condition 4.3.2 of the environmental permit states:

Any information provided under condition 4.3.1(a)(i) or 4.3.1(b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

(b) Compliance Assessment***Failure to Monitor HOI***

As soon as the operator was aware of a potential issue with HOI monitoring, an email was immediately sent to NRW. This was followed by an online meeting on 01 May 2026 to discuss the matter and potential implications for permit compliance.

Once confirmed that the required HOI monitoring had not been undertaken in accordance with permit requirements, the operator submitted a Schedule 5 Part A notification to NRW on 1 May 2026. NRW is satisfied that the operator complied with the notification requirements of the environmental permit once the non-compliance had been identified and confirmed.

Compliance Classification Scheme: There are no incidents of non-compliance with permit condition 4.3.1 (b)(i) and / or 4.3.2.

Justification: NA

Action: no action required

(c) Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

(d) Root Cause Analysis

NA

[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.