

Compliance Assessment Report CAR_NRW0052461

Permit being assessed: KP3135KV.

For: The Royal Mint, **held by:** The Royal Mint Limited

At: Llantrisant, Pontyclun, Rhondda Cynon Taf, CF72 8YT.

Type of assessment: Site Inspection,

Reason: Routine.

On: 22/07/2026 between 10:00 and 14:30.

Parts of permit assessed: Various.

NRW Lead Officer: Greg Gardner, accompanied by Regina Simmons.

Report sent to: SHE Manager, SHE Manager, on 14/08/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR3D - Installations - Emissions and monitoring - Noise and vibration	Assessed (A)	
IR3I - Installations - Emissions and monitoring - Fire	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
1	4

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
IR3A(2)	TRM shall undertake a comprehensive review of the A32 depopulation furnace extraction and abatement system and implement permanent engineering improvements to restore compliance with the particulate matter ELV of 5 mg/m ³ . The operator shall provide NRW with an updated compliance plan detailing the status of the proposed thermal oxidiser and spray tower installations, outcomes of an independent technical review, enhanced monitoring arrangements, Management of Change assessment findings, and a programme of verification monitoring. The plan must demonstrate how compliance will be achieved and maintained and include contingency measures should further exceedances occur.	25/09/2026

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

This report details the site visit made on the 22nd July 2026 to The Royal Mint Ltd site, permit reference number EPR-KP3135KV.

Natural Resources Wales (NRW) Senior Officer Greg GARDNER and South Central Industry Regulation Team Leader Regina SIMMONS attended the The Royal Mint (TRM), Llantrisant, Pontyclun, Rhondda Cynon Taff, CF72 8YT for a planned routine site inspection at 10:00am where they were met with TRM Ltd Management. The site was operational where the weather was dry, sunny and warm at the time of the inspection.

DISCUSSION OF PREVIOUS ACTIONS (CAR_NRW0049254) - 13/08/25

	Action	Update
1	A clear timeline for restoring compliance, including dates for system reconfiguration, selection and installation of additional filtration, and consultation with approved specialists. Interim measures to minimise environmental impact and protect sensitive receptors while the stack remains non-compliant. Proposals for additional monitoring, particularly during likely worst-case	TRM submitted a documented compliance restoration timeline to NRW on 26/03/2026, outlining the actions required to return Stack A32 to compliance with the permitted particulate matter emission limit. While this remains a live working document, early indications from the actions

	operating scenarios, to better understand the scale and variability of emissions. A schedule for reporting progress to NRW, including key milestones and contingency actions if further exceedances occur. An assessment of the likely mass emissions during the period of non-compliance, based on process type (continuous vs batch) and emission concentrations	implemented to date suggest that progress is being made towards restoring compliance. However, following emissions monitoring undertaken at the site on 07/07/2026 by an MCERTS-accredited contractor, the test results, which were shared with NRW on 05/08/2026, identified an exceedance of the particulate matter emission limit for Stack A32. The monitoring results recorded a particulate matter concentration of 15.5 mg/m³, exceeding the permitted limit of 5 mg/m³. Further investigative work is currently being undertaken to determine the cause of the exceedance and implement the necessary corrective measures to return the site to compliance.
2	Restore compliance of the A32 emissions stack through targeted maintenance activities and ongoing performance monitoring and report investigation findings as well as preventative / mitigation measures to NRW - Exceedance of particulate matter on stack A32 - permitted limit is 5mg/m ³ , actual was 11.2mg/m ³ on 22/08/25 - Q2	As per update within Action 1
3	Restore compliance of the A32 emissions stack through targeted maintenance activities and ongoing performance monitoring and report investigation findings as well as preventative / mitigation measures to NRW - Exceedance of particulate matter on stack A32 - permitted limit is 5mg/m ³ , actual was 19.5mg/m ³ on 17/11/25 - Q3	As per update within Action 1
4	Restore compliance of the A32 emissions stack through targeted maintenance activities and ongoing performance monitoring and report investigation findings as well as preventative / mitigation measures to NRW - Exceedance of particulate matter on stack A32 - permitted limit is 5mg/m ³ , actual was 10.5mg/m ³ on 29/01/25 - Q4,	As per update within Action 1

	2024/25	
--	---------	--

DISCUSSION OF PREVIOUS ACTIONS (CAR_NRW0050845) - 25/02/26

	Action	Update
1	Investigate the approach to the particulate matter limit at emission point A33 and identify any existing or planned mitigation measures to ensure that future emissions remain below the permitted limit. In addition, provide an update on the current and proposed mitigation measures for emission point A32, in continuation of the corrective actions required following the particulate matter exceedances recorded under CAR_NRW0049254.	Stack A33 (Precious Metals Recovery, PMR) had been non-operational since November 2025 and was recommissioned approximately two weeks prior to the inspection. At the time of the inspection on 22/07/2026, the PMR process was operational and is expected to remain so for several further weeks. TRM intends to undertake emissions monitoring of Stack A33 using an MCERTS-accredited contractor, with the results to be submitted to NRW upon completion of the testing programme. In recognition of the intermittent nature of site operations and the recent recommissioning of the process, NRW agreed to an extension of the associated action deadline pending completion of the monitoring and review of the results.

DISCUSSION OF PREVIOUS ACTIONS (CAR_NRW0052431) - 21/07/26

	Action	Update
1	Provide a revised CCRA to include the recommendations highlighted within the CAR Form and submit to Natural Resources Wales by 25/09/2026.	TRM required to submit revised CCRA (Climate Change Risk Assessment) following recommendations highlighted with CAR form by 25/09/26.

SITE DISCUSSIONS

TRM TRIALS

Discussions were held with various representatives of TRM regarding both planned waste trials and trials that have already been undertaken at sites across the UK.

During these discussions, it was noted that TRM had recently conducted a trial at a site in Wales operating under a D5 Waste Exemption. A D5 Waste Exemption permits the deposit and storage of waste samples where necessary for compliance with, or enforcement of, specified regulations, or where samples require testing and analysis for research purposes. TRM advised that the receiving site had classified the material as test material rather than waste and, on this basis, permitted the testing and analysis to proceed.

There is a potential Duty of Care due diligence issue regarding the transfer of waste to a site operating under a claimed D5 exemption. While waste transfer documentation was completed, a licensed waste carrier was used, and risk assessments were undertaken, it is unclear whether TRM sufficiently verified that the receiving site's authorisation covered the activity undertaken.

At present, there is insufficient evidence to demonstrate a breach of Permit Condition 1.1.1. However, the matter may indicate a management system weakness if TRM relied solely on assurances from the receiving site without independently confirming the scope of the exemption.

The issue is therefore currently considered a potential management system weakness relating to Duty of Care due diligence, rather than a confirmed permit breach. Further enquiries are required to establish what checks were undertaken by TRM. If no adequate verification was carried out, a Category 3 non-compliance against condition 1.1.1 may be warranted.

Based on the information provided by TRM, it appears that the processes undertaken would generally be considered physical treatment and recovery activities rather than the testing or analysis of waste samples. Although the trial was conducted over a two-day period, the reasonably foreseeable environmental impact associated with the activity was considered to be low, taking into account the following factors:

- The quantity of material involved was relatively small, approximately one tonne.
- The work was carried out indoors using enclosed processing equipment.
- A Royal Mint representative was present throughout the trial to oversee the activities.
- Dust extraction and collection systems were reportedly operational for the duration of the trial.
- The activity was limited to dry mechanical processing, with no chemical additions or thermal treatment involved.
- No evidence of pollution to air, land or water has been identified.
- Risk assessments were undertaken by both TRM and the receiving site.
- Following completion of the trial, the material was reportedly recovered and returned to The Royal Mint by a licensed waste carrier, with the appropriate waste transfer documentation completed.

During the discussion, it was agreed that, for any future trials, TRM would submit a detailed trial plan sufficiently in advance to allow NRW to review the proposal as soon as reasonably

practicable. This approach will help ensure that any regulatory or operational issues are identified and addressed at an early stage, enabling a timely decision on whether the proposed trial may proceed.

PERMIT VARIATION

On 18/06/2026, NRW issued a varied environmental permit to TRM, increasing the site's capacity to receive and process additional WEEE (Waste Electrical and Electronic Equipment) materials. The variation also authorised the downscaling of existing operations and a significant reduction in on-site coin production activities, including the decommissioning of several processing lines.

IMPROVEMENT CONDITIONS

Further discussions during the site visit referred to TRM's outstanding Improvement Conditions (ICs), as set out in Section 2.4 of the site's Environmental Permit. To date, 22 of the 25 ICs have been completed. The remaining ICs are outlined below, together with an update on progress against each condition.

	Improvement Condition	Update
1 (IP22a)	The Operator shall undertake noise monitoring at the nearest local receptors. An addendum to the existing noise impact assessment for the site shall be submitted to Natural Resources Wales for approval. This shall: • Meet BS4142:2014+A1:2019 standards • Reference to the Welsh Government Noise and soundscape action plan 2018-2023 The Operator shall submit the revised noise impact assessment to Natural Resources Wales for approval.	These improvement conditions originate from Version 5 of TRM's Environmental Permit, which was issued in connection with the introduction of the Direct Brass plant. The Direct Brass plant was subsequently incorporated into Version 6 of the permit; however, shortly after the variation was granted, the plant was taken out of operation. The current permit version (Version 7) reflects the site's revised configuration and no longer includes the Direct Brass treatment line.
2 (IP23)	The Operator shall submit a noise management plan including any mitigations proposed under improvement program IP22b (if applicable). This shall be completed in line with the current relevant guidance. The Operator shall submit the noise management plan to Natural Resources Wales for approval.	The operational noise assessment has now been completed, and the final report from the contractor is awaited. The assessment will: • Confirm current noise impacts from the site's updated configuration. • Determine whether further noise mitigation measures are required. • Help establish whether a Noise Management Plan needs to be reviewed or prepared in line with

		IP23
3 (IP24)	The operator shall submit an inventory of wastewater and waste gas streams, as part of the environmental management system, and in accordance with BAT 3 of the EU BAT Conclusions on Waste Treatment published August 2018.	Ongoing - This is required to be submitted within 6 months after issuing of permit variation V007 (issue date 18/06/26)

DIGITAL WASTE TRACKING

On 01/10/26, operators of waste receiving sites must use the Digital Waste Tracking System. Digital waste tracking will make it easier to understand the waste created and what happens to it. Businesses can use this information to reuse and recycle more. Further information of the upcoming system can be found via this link - [Mandatory digital waste tracking system | GOV.WALES](#)

GENERAL OBSERVATIONS - SITE WALKAROUND

NRW personnel were escorted around the site, commencing at the depopulation facility, where Printed Circuit Boards (PCBs) are processed through a combination of manual and mechanical techniques to recover valuable materials, including precious metals. The facility was observed to be well organised, with clearly defined operational areas, appropriate signage, and high standards of housekeeping. No significant accumulation of waste materials or debris was evident within the areas inspected. Environmental management controls appeared effective, with no offensive odours, excessive noise, or visible dust emissions detected during the visit. Containers used for liquid storage were appropriately labelled and stored within secondary containment systems, minimising the risk of spills and potential environmental contamination.

The inspection then moved to the WEEE reception and processing area, where incoming units are assessed to determine their suitability for reuse. Equipment deemed suitable is refurbished and prepared for resale, while non-reusable units are dismantled, with PCBs removed and transferred to the depopulation facility for further processing and material recovery. The area was clean, orderly, and well maintained, with clearly defined operational processes and no evidence of uncontrolled waste storage or accumulation. Effective segregation between waste materials and products intended for reuse was in place, demonstrating good operational controls and material management practices. Environmental conditions were effective, with no detectable odours, excessive noise, or significant dust emissions observed during the inspection.

The final area inspected was the PMR facility. Similar standards were observed throughout, with the facility appearing well organised and operational areas clearly delineated and appropriately signed. Housekeeping standards remained high, with no notable accumulation of waste or debris. Environmental controls appeared effective, and no offensive odours, excessive noise, or visible dust emissions were identified during the inspection. Liquid storage containers were correctly labelled and located within suitable secondary containment systems, further demonstrating the site's commitment to environmental protection and good housekeeping practices.

A32 DEPOPULATION STACK - PARTICULATE MATTER EXCEEDANCE

On 05/08/2026, TRM submitted a Schedule 5 notification to NRW reporting an exceedance of the particulate matter (PM) emission limit on Stack A32, located within the depopulation section of the plant.

The PM exceedance recorded on 07/07/2026 by an MCERTS-accredited contractor recorded a PM concentration of **15.5 mg/m³** during a one-hour emissions test on Stack A32, exceeding the permitted emission limit value (ELV) of **5 mg/m³**.

Whilst the result represents an exceedance of the permitted limit, there remains no evidence of significant off-site impacts, deterioration in ambient air quality, complaints from sensitive receptors, or exceedances of National Air Quality Standards. The environmental effect is therefore considered minor, localised and limited to the immediate vicinity of the installation, consistent with a Category 3 impact.

This latest exceedance is of particular concern as it follows several previous PM breaches from Stack A32. These are detailed in CAR Form - CAR_NRW0049254. The recurrence of the issue indicates that previous corrective actions have not been sufficient to achieve sustained compliance and suggests that the underlying causes have not been fully identified or addressed.

The following factors have been considered in assigning the non-compliance score:

- The PM concentration of **15.5 mg/m³** exceeded the permitted ELV by a factor of three.
- This is a repeat non-compliance for Stack A32, following previous reported exceedances.
- Previous maintenance and operational improvements have not delivered sustained compliance.
- The operator has previously identified limitations within the extraction and filtration systems, indicating an ongoing systemic issue.
- Continued exceedances increase the risk of cumulative environmental impacts and undermine confidence in the effectiveness of the site's emission control arrangements.

Accordingly, the breach has been assessed as a **Category 3 non-compliance**, reflecting the limited environmental impact observed whilst recognising the significance of repeated failures to maintain compliance with permit conditions.

ROOT CAUSE ANALYSIS

Previous investigations identified that PM emissions from Stack A32 are generated by the Depopulation Furnace process and that increases in operational throughput and changes in feedstock characteristics may have exceeded the effective operating range of the existing extraction and filtration systems.

The recurrence of the exceedance in July 2026 suggests that:

- Existing abatement systems remain inadequately sized or configured for current operating conditions.
- Previous corrective actions have addressed symptoms rather than the root cause.
- Management of Change (MoC) arrangements may not have adequately assessed the impact of operational, throughput or feedstock changes on environmental performance.

- Control measures and operational monitoring have been insufficient to identify declining abatement performance before permit limits were exceeded.

The recurring nature of this non-compliance suggests that the issue extends beyond isolated operational or technical deficiencies and may indicate underlying weaknesses within the site's environmental management and control systems.

Given the repeated exceedances, NRW would reasonably expect the operator to demonstrate that the root causes have been comprehensively identified and understood, and that effective, permanent engineering solutions are being implemented, validated and managed through a robust programme of monitoring and performance verification to ensure and demonstrate sustained compliance through at least two consecutive compliant MCERTS emissions tests following implementation of permanent engineering improvements. Should these issues persist, NRW may consider the use of formal enforcement powers where appropriate.

ACTION: TRM shall undertake a comprehensive review of the A32 depopulation furnace extraction and abatement system and implement permanent engineering improvements to restore compliance with the particulate matter ELV of 5 mg/m³. The operator shall provide NRW with an updated compliance plan detailing the status of the proposed thermal oxidiser and spray tower installations, outcomes of an independent technical review, enhanced monitoring arrangements, Management of Change assessment findings, and a programme of verification monitoring. The plan must demonstrate how compliance will be achieved and maintained and include contingency measures should further exceedances occur.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012

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.