

Compliance Assessment Report CAR_NRW0052622

Permit being assessed: BT4885IT.

For: Shotton Paper Mill EPR/BT4885IT, **held by:** Shotton Mill Limited

At: WEIGHBRIDGE ROAD SHOTTON , DEESIDE, DEESIDE, CLWYD, CH5 2LL.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 03/08/2026.

Parts of permit assessed: Review of Q1 (January-March) 2026 monitoring returns .

NRW Lead Officer: Jamie Blythin, accompanied by Stuart Ross.

Report sent to: Environmental Advisor, Environmental Advisor, 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
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Action only (X)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR4C - Installations - Information - Notification	C3 Minor	4.3.1(b)
IR4B - Installations - Information - Reporting	C4 No impact	4.2.3

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

Total non-compliances recorded	Total non-compliance score
4	12.1

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)	Action 1: Provide NRW with an updated schedule 5 notification (parts A and B) for the ELV breach of carbon	01/09/2026

Criteria	Action needed	Complete by
	monoxide on 01/03/26. This should include, but not be limited to, a root cause analysis of the ELV breach and a more detailed explanation of how the proposed measures have been implemented to prevent reoccurrence.	
IR3A(1)	Recommendation: Investigate elevated pH and provide NRW with a written update, explaining the reasons for the elevated results and what measures have been put in place to prevent a breach of the permitted maximum pH	10/09/2026
IR3A(1)	Action 2: Investigate the exceedance of the permitted ELV for lead at emission point E1. Provide NRW with a Schedule 5 notification (parts A and B) outlining the reasons for this breach and the measures that have been put in place to prevent reoccurrence.	10/09/2026
IR4C	Action 3: Review procedures and staff training to ensure Schedule 5 notifications are submitted to NRW in accordance with the permit requirements.	10/09/2026
IR4B	Action 4: Ensure reporting forms are fully populated with information required by the permit, including test methods and measurement uncertainties.	31/08/2026

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

Shotton Mill Q1 Returns

This Compliance Assessment Report (CAR) follows a review of the routine quarterly emissions monitoring returns for Q1 (January-March) 2026.

Emissions to air (emission point A20)

A. Continuous Emissions Monitoring (CEM) data

Emissions were compliant except carbon monoxide (CO).

On 01/03/26, the returns data shows that there was an exceedance of the half hourly average for carbon monoxide whereby a value of 106mg/m³ was recorded Vs the permitted half hourly average Emission Limit Value (ELV) of 100mg/m³. NRW considers this a breach of permit condition 3.1.2 (IR3A(2)-Emissions to air) and a C3 non-compliance score has been applied.

A schedule 5 notification (part A) was submitted to NRW on 10.04.26 and the part B was submitted on 20.07.26. Within the schedule 5 notification the operator states the following reasons for the ELV exceedance

'Bed temps dropped to 840oC stopping the recirc fan. Fan re started as soon as op noticed but the CO spiked for 7 mins up to 117 mg/m³ during 30 min avg., this resulted in 30 min avg result coming in at 106.1 mg/m³. This was caused by an earlier turbine trip.'

In the part B, the operator states they have completed 'Additional operator training across all shifts to ensure consistent approach and procedures reviewed.'

This schedule 5 notification (parts A and B) does not currently provide sufficient information to explain the root cause of the issue and how this links to the measures that have been implemented to prevent reoccurrence.

Action 1: Provide NRW with an updated schedule 5 notification (parts A and B) for the ELV breach of carbon monoxide on 01/03/26. This should include, but not be limited to, a root cause analysis of the ELV breach and a more detailed explanation of how the proposed measures have been implemented to prevent reoccurrence.

B. Six monthly extractive monitoring data

No data submitted for this quarter (not required).

Emissions to surface water (emission point W1)

All emissions were compliant with the permitted ELVs. However, it should be noted that the maximum result for pH this quarter was recorded as 8.9. This is very close to the maximum permitted ELV for pH. (9)

Recommendation: Investigate elevated pH and provide NRW with a written update, explaining the reasons for the elevated results and what measures have been put in place to prevent a breach of the permitted maximum pH.

Emissions to sewer (emission point E1)

Emissions were complaint with the permitted ELVs except lead and its compounds, expressed as (Pb). This recorded a maximum value of 0.941mg/l Vs an ELV of 0.2mg/l.

NRW considers this a breach of permit condition 3.1.2 (IR3A(1)-Emissions to water) and a C3 non-compliance score has been applied.

Action 2: Investigate the exceedance of the permitted ELV for lead at emission point E1. Provide NRW with a Schedule 5 notification (parts A and B) outlining the reasons for this breach and the measures that have been put in place to prevent reoccurrence.

A schedule 5 notification was not submitted to NRW in relation to the ELV exceedance for lead. NRW considers this to be a breach of permit condition 4.3.1 (b) (IR4C-Notification) and a C3 non-compliance score has been applied.

Action 3: Review procedures and staff training to ensure Schedule 5 notifications are submitted to NRW in accordance with the permit requirements.

Reporting

On review of the reporting forms submitted, it was found that some information was missing e.g. Form W1 - not all test methods and measurement uncertainties included, Form S1- not all measurement uncertainties included. NRW considers this a breach of permit condition 4.2.3 (IR4B-Reporting) and a C4 non-compliance score has been applied.

Action 4: Ensure reporting forms are fully populated with information required by the permit, including test methods and measurement uncertainties.

Other return data

Form Residue 1 received, IBA LOI <0.2%

Form Performance 2 received – nil return.

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.