

Compliance Assessment Report CAR_NRW0036837

Permit being assessed: BU7766IC.

For: Bryn Posteg Landfill , held by Sundorne Products (Llanidloes) Ltd
At: Bryn Posteg Landfill Site Tylwch Road , Llanidloes, Powys, SY18 6JJ.

Type of assessment carried out: Report/Data Review, Reason: Routine.
On 31/12/2019.

Parts of permit assessed: see report

NRW Lead Officer: Lara Cubley.

Report sent to: David Williams/Deborah Hall, Technical Manager/EH&S Compliance Manager on 12/08/2020.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C3 Minor	4.2.2, 4.2.3 and 4.3.2
E2 - Emissions - Land and groundwater	C2 Significant	2.7.1, 3.1.5 & 3.1.7
C1 - General Management - Staff competency/training	C2 Significant	1.1.1
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	C3 Minor	3.7.1 & 4.2.2
E4 - Emissions - Sewer	C3 Minor	3.1.2
E3 - Emissions - Surface water	C3 Minor	3.1.2
C2 - General Management - Management system and operating procedures	C2 Significant	1.1.1

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

Total number of non-compliances recorded	Total non-compliance score
7	109

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
G4	See Actions 1-3, 12-14, 16 and 19 and associated timescales so of which are with immediate effect.	31/08/2020
E2	See report Actions 4, 7 by 31/08/20 & action 11 by 31/10/20	31/10/2020
C1	See report Actions 5 & 6	31/08/2020
G1	See report Actions 8, 9, 17, 18 & 20 with associated varying	31/08/2020

Criteria	Action needed	Complete by
	timescales attached with some required with immediate effect.	
E4	See report Action 10	31/08/2020
E3	See Action 9 of CAR form CAR_NRW0036059 and report text (action still outstanding)	03/08/2020
C2	See report text Action 15 required with immediate effect. Action 10 of CAR_NRW0036059 outstanding.	07/08/2020

Action 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

Introduction

We have reviewed reports:

- Bryn Posteg Landfill Site Quarterly Monitoring Review October – December 2019 3913-CAU-XX-XX-RP-V-0304.A0-C submitted on the 11/02/20.
- Bryn Posteg Landfill Site Annual Monitoring Review January – December 2019 3913-CAU-XX-XX-RP-V-0304.A0-C submitted on the 11/02/20.

For the Oct – Dec 2019 and annual report an extension of 1 week was agreed on 31/01/20. Please note the requirement of Condition 4.2.3 requires the report to be submitted within 28 days of the end of the reporting period. **NRW is of the opinion this is a breach of Condition 4.2.3 (G4 = CCS4).**

Landfill Gas – Other monitoring requirements Table S3.8

The Operator has submitted in-waste gas collection monitoring data from the gas collection system. The Oct – Dec 2019 returns expressed this as minimum, maximum and average values which did not address the shortcomings as outlined in previous CAR_NRW0036059. NRW considers this a breach of **Conditions 4.2.3 (G1 Monitoring of emissions and the environment – CCS3) for quarter Oct – Dec 2019. ACTION 1: Operator to ensure such data is included in subsequent quarterly monitoring reports going forward with immediate effect.** This has been addressed in Jan-March 2020 monitoring returns and as such no CCS score applied for Jan - Mar quarter. Encouragingly, the Operator has also commented on efforts taken to address issues of oxygen levels exceeding 5% etc.

In Oct – Dec 2019 there were 24 monitoring points which exceeded 100ppm Carbon Monoxide (CO).

ACTION 2: The Operator shall provide an update of investigations into elevated levels of CO, measures being taken, or proposed by 31/08/20. The Gas Management Plan should be followed. The Operator must also provide 'Gas Run' calculator data/analysis to NRW by the 31/08/20 and assessment by Exea every 3 months as per Gas Management Plan.

ACTION 3: The Operator must follow their Gas Management Plan and provide an update to NRW in writing on investigations of air ingress, bag sampling, and associated actions where ratios of

CH4:CO2 are <1 by 31/08/20**Landfill Gas in external monitoring boreholes** Table S3.6

The Operator has submitted monitoring data for landfill gas in external boreholes at between 35 and 37 locations around the perimeter of the waste mass. Data on atmospheric pressure, temperature or meteorological data has been included from January 2020 as required by the Permit.

In quarter Oct – Dec 2019 a total of 13 locations breached both the limits for Methane and Carbon Dioxide set under Condition 3.1.7 of the Permit and a further 15 locations breached only the Carbon Dioxide limits set by the Permit. **NRW considers Condition 3.1.7 of the Permit to be breached (E2 Emission Land – CCS = 2 Oct – Dec 2019).**

This monitoring data indicates that the landfill gas is migrating externally to the site posing a significant environmental risk. The Operator provided the report *Gas Extraction System Audit (Document Reference: 3913-CAU-XX-XX-RP-V-0302.A0-C1 November 2019)* on 12/02/20.

ACTION 4: The Operator should pursue the recommended actions within this report, submitting CQA plans where necessary prior to undertaking improvement works and follow the Gas Management Plan. An update on progress must be provided to NRW in writing by 31/08/20.

The Operator has provided a Part A and Part B notification for these exceedances in perimeter gas boreholes as required by Condition 4.3 of the Permit for the period November & December 2019. The Operator states that measures taken or intended to be taken, to stop the emission are '*a review of the current gas extraction system is being undertaken to assess the efficiency of the system and to identify improvements that can be made. Monitoring trends to be discussed during quarterly review meetings.*' The Operator states, '*No sensitive receptors at the locations where the emissions were detected.*'

NRW does not agree with this due to receptors being present at site offices and some residential properties within 500m of the site. There is the potential for a pathway through gravel lenses, cracks/fissures, and services.

Leachate Table S3.1/S3.4/S3.9

Monthly leachate levels for the monitoring points have been provided required by the Permit for the period Oct – Dec 2019. Leachate levels provided for the period Jan – Mar 2020 appear to have been based on different 'base depth', which would appear to be due to installation of new wells in June 2019. As such, the data used for base of wells in this reporting period is incorrect and requires correction and re-submission. Data provided must be expressed as mAOD and head above cell base/sump. **NRW are of the opinion this is a breach of Condition 1.1.1 (C1 Staff competency & training CCS = 2 Jan – Mar 2020)** with the potential for a significant risk to the environment. This demonstrates a lack of overarching management to ensure appropriately trained staff and supervision.

ACTION 5: The Operator must ensure all staff who have responsibilities for monitoring, review, compliance assessment and reporting with respect to leachate have been appropriately trained and are aware of the requirements of the Leachate Management Plan and Permit. It is also advisable that an appropriate level of quality assurance be established. The Operator must provide evidence to demonstrate such training has been delivered in writing by 31/08/20.

ACTION 6: The Operator must correct the data submitted for leachate levels for this period October - December 2019 and re-submit it in writing to NRW by 31/08/20 so that the public register can be updated.

Condition 2.7.1 requires leachate levels to be less than 1m above sump base. Leachate levels are considerably above this at all monitoring points throughout the period Oct 2019 – March 2020, apart from monitoring point LCP8 on 19/03/2020, measuring 0.79m and RMLP9B on 08/01/2020, measuring 0.71m. Leachate levels as high as 23.96m above base of sump have been recorded in RMLP9D, which is

uncapped. **NRW considers the Operator to have breached Condition 2.7.1 (E2 Emissions Land – CCS2 Oct – Dec 2019 consolidated) with the potential for a significant risk to the water environment. An Enforcement Notice(EN) was served (05/12/20) on the Operator with the aim of returning them into compliance with Permitted levels.**

ACTION 7: The Operator shall use suitable resources (Financial and technical) to reduce leachate heads in all landfill cells to below the 1m above sump base compliance limit listed in the Permit by the date required in the EN.

The Operator has reported monthly raw leachate quality data from the points specified in Table S3.9 of the Permit.

The 6 monthly raw leachate quality data fails to include parameters EC, NH₄-N, TON, TOC, BOD, COD, Ca and Mg for all monitoring points and Cyanide is missing for just RMLP9C. The annual List 1 screen was also provided, but Mercury is missing for a number of monitoring points and some parameters for RMLP9C. **NRW considers this a breach of Conditions 3.7.1 (G1 Monitoring of emissions & the environment – CCS3).**

ACTION 8: Operator to ensure such data is provided in subsequent quarterly monitoring reports and annually with immediate effect.

ACTION 9: The Operator must update plans/procedures, management and training to ensure such monitoring parameters required by the permit are included in monitoring plans and those with responsibilities are aware going forward. Please respond to NRW in writing to provide evidence of completing this action with updated plans/procedures by 31/08/20.

The Operator has reported monthly leachate quality data following treatment at the effluent treatment plant required by table S3.4, apart from Sulphate/COD for November and temperature for the period Oct – Dec 2019. This appears to have been resolved for the period Jan – Mar 2020.

On the 31/10/19 the treated effluent breached the pH limit of 6 – 10 with a reading of 5.8. **NRW is of the opinion this is a breach of Condition 3.1.2 (E4 Emissions Sewer – CCS = 3) on 31/10/19.**

ACTION 10: The Operator must provide Part B investigation into this incident as required by Condition 4.3. Please provide this investigation to NRW in writing by 31/08/20.

Groundwater Table S3.5/S3.10

The Operator has provided monitoring data as required by the permit for groundwater monitoring apart from that for:

- Monitoring point W1 – Monthly parameters for October.
- Monitoring point W10 – Quarterly parameters and monthly for October/November. The report advises that this monitoring point was remediated enabling sampling in December.
- Quarterly data for temperature, Arsenic, Antimony, and Bicarbonate at all monitoring points.

NRW considers this a breach of Conditions 3.7.1 & 4.2.3 (G1 Monitoring of emissions & the environment – CCS = 3 consolidated).

ACTION 8&9 (continued): Operator to ensure such data is provided in subsequent quarterly monitoring reports.

Condition 3.1.5 states that the trigger levels for emission to groundwater for the parameters and monitoring points set out in Table 3.5 shall not be exceeded.

- The Chloride concentration in W1 exceeded the permitted limit of 69mg/l throughout the monitoring quarter with a maximum concentration of 269mg/l.
- The Mecoprop concentration in W4 and W5 exceeded the permitted limit of 0.1ug/l with a maximum

concentration of 0.15ug/l. Such results are not concerning given that this determinand has been downgraded and the trigger level will be modified in the variation.

The Toluene concentration at W3, which was significantly elevated in the previous period was below the trigger level of 4ug/l, indicating that this could have been a spurious result.

NRW considers the Operator to have breached Condition 3.1.5 (E2 Emissions Land – CCS = 3 consolidated with leachate heads Condition 2.7.1) with the potential for a minor risk to the water environment.

ACTION 11: If the Operator believes W1 Chloride concentrations to be caused by road salt, appropriate measures to prevent contamination of the groundwater borehole should be implemented as far as reasonably practicable and a variation application should be submitted with enough evidence to demonstrate this is the case, suggesting updated trigger levels for this location by 31/10/20.

Annual analysis for priority hazardous substances has been provided.

Surface Water Table S3.3

Condition 3.1.2 states that the limits given in Table S3.3 shall not be exceeded. Monthly monitoring data has been submitted and showed that location P2 exceeded the permitted limit for suspended solids of 50mg/l in November with a concentration of 99mg/l.

NRW considers the Operator to have breached Condition 3.1.2 (E3 Emissions Water – CCS = 3) with a potential minor impact on surface waters.

Condition 3.7.1 (b) requires monitoring as per table S3.3, which includes location SW3. The Operator states that the proposed reed bed has not yet been commissioned. **NRW considers that the Operator has breached Condition 3.7.1 (b) as SW3 monitoring has not been included (G1 Monitoring of emissions & the environment – CCS = 3 consolidated).** The Operator has yet to install a surface water management system that prevents pollution of the watercourses. Plans did include a design with a reed bed but this was never constructed. The Operator has identified improvements required to the surface water system in response to Improvement Condition 7 (see report 'Byn Posteg Landfill Site Surface Water Management Review 3221-CAU-XX-XX-RP-V-0300-A0-C1 February 2018).

As per previous CAR_NRW0036059 – a variation to the permit will be required for changed surface water plans and action 9 is still outstanding.

Ambient Air Table S3.11

Monitoring data for particulate matter required by Condition 3.7.1(e) for the quarter was submitted. This confirms that the limit of 200mg/m³/day required by Condition 3.1.8 table S3.11 of the Permit was complied with.

General Management Condition 1.1.1

'Condition 1.1.1 requires the Operator to 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 and those drawn to the attention of the operator as a result of complaints; and*

b. *using sufficient competent persons and resources.*

NRW considers that the Operator has breached Condition 1.1.1 (C2 Management Systems – CCS = 2).

The root cause of many of the breaches in this Compliance Assessment Report are related to the Operator not managing and operating the activities in accordance with management systems.

See previous CAR_NRW0036059 (Action 10) - The Operator shall ensure that site activities are managed and operated in accordance with approved management systems with immediate effect. Improvements in site management are likely to lead to a reduction in compliance scores and pollution. The operator is currently developing an Environmental Management System for the site.

Notifications Condition 4.3

The following table summarises the notifications for the period October 2019 – December 2019, as required by Condition 4.3 of the Permit.

Date	Brief description	Actions/Recommendations
November & December 2019	Perimeter Gas Boreholes exceeding Methane & CO2 trigger level	Operator states, 'Specific actions will be submitted to NRW.' Please submit specific actions and update on progress against actions from recent audit.
November & December 2019	Groundwater W1 exceeding Chloride trigger	November recorded concentration of 269mg/l versus 69mg/l. December recorded concentration of 268mg/l. Part B states, ' <i>investigations to confirm the origins, thought to be road salt are ongoing.</i> '
December 2019	Groundwater W4 and W3 exceeding Mecoprop trigger	Continued monitoring and identification of trends are suggested by the Operator. No Part B notification has been received by NRW. See Action 12.
November 2019	Surface Water P2 exceeding Total Suspended Solids trigger	TSS concentration of 99mg/l versus the 50mg/l trigger. Operator suggests this is an isolated incident as the December sample was compliant. No Part B notification has been received by NRW. See previous CAR_NRW0036059 Action 9 still outstanding.
October – December 2019	Leachate levels exceeding 1m above sump base trigger	LCP1, LCP2, LCP3, LCP6, LCP7, LCP8 and RMLP9A, RLMP9B West, RLMP9C and RLMP9D all exceeded trigger level. Part B states, ' <i>pumps serviced and extraction has increased with decreasing trend in RLMP9B West, RLMP9C and RLMP9D.</i> '
31/10/19	Sewer Discharge exceeding pH limits	pH of 5.8 versus 6 – 10 limit. Operator states, 'that following monthly samples were compliant.' No Part B notification has been received by NRW. An investigation into why October 2019 sample was not compliant is required.

See previous comments/action of CAR_NRW0036059 relating to Notifications. Part B information required by Condition 4.3.2 (measures taken to rectify, limit or prevent pollution and prevent recurrence of the incident) should be supplied as soon as practicable. As per table above, 3 Part B's remain outstanding. **NRW considers this a breach of Condition 4.3.2 (G4 Reporting & Notifications – CCS3 consolidated).**

ACTION 12: Operator is to submit the three outstanding Part Bs by 31/08/20 taking into account

comments in table above.

Point Source Emissions to Air Table S3.2

It is believed the landfill gas flare was monitored on 15/01/20 as required by Permit Condition 3.7.1(b). However, emissions monitoring results as required by Condition 4.2.3 have not been reported.

NRW is of the opinion that Condition 4.2.3 has been breached as annual flare monitoring for 2019 has not been reported to NRW (G4 Reporting & Notifications – CCS = 3 consolidated).

Action 13: The Operator must submit the flare monitoring results to NRW in accordance with the Permit without delay.

The flare emissions monitoring for the 2019 period was delayed until January 2020 due to maintenance requirements on engines and as such to allow all emissions monitoring to be completed in one visit. This has also been late previously. The Operator has stated that such emissions monitoring will be planned for September in case any issues arise which may cause delay. It is encouraging to see that the Operator is looking to resolve the potential for non-compliance with monitoring requirements.

Landfill Gas from Capped Surfaces Table S3.7

Annual emissions monitoring from capped surfaces for the period 2019 is believed to have taken place on the 3rd & 4th February 2020. However, emissions monitoring results as required by Condition 4.2.3 have not been reported to NRW. The monitoring for the period of 2019 was delayed and conducted in the following year.

NRW is of the opinion that Condition 4.2.3 has been breached as annual flare monitoring for 2019 has not been reported (G4 Reporting & Notifications – CCS = 3 consolidated).

NRW is of the opinion that Condition 3.7.1 has been breached as monitoring for 2019 was late having been conducted in February 2020. In being late conducting and managing such monitoring, NRW is also of the opinion that Condition 1.1.1 of the permit is breached (C2 Management Systems CCS = 3 consolidated). The root cause of many of these breaches can be attributed to management failure.

ACTION 14: The Operator must submit the FID monitoring results to NRW in accordance with the Permit without delay.

ACTION 15: The Operator is to ensure that monitoring from capped surfaces and other monitoring requirements for the period 2020 are conducted in a punctual manner without delay. The Operator is advised to book such monitoring well in advance and earlier rather than later so that some contingency is built in for any unforeseen circumstances.

Landfill Gas – other monitoring requirements Table S3.8

Annual trace gas analysis is believed to have been conducted for the period 2019 according to the annual report. However, we have not received the monitoring data as required by condition 3.7.1. **As above this is a breach of Condition 4.2.3 (G4 Reporting & Notifications – CCS = 3 consolidated).**

ACTION 16: The Operator must submit the trace gas monitoring results to NRW in accordance with the Permit without delay.

Annual Report Condition 4.2.2 Table S4.2/S4.3

Energy consumption at the site has been reported as required by Condition 4.2.2(b).

Annual production/treatment as required by Condition 4.2.2 (c) was provided. However, the normalised cubic metres combusted in the flare and gas engines has been estimated and reported as one combined figure.

NRW is of the opinion that this is a breach of Condition 4.2.2(b) (G1 Monitoring of emissions and the environment CCS = 3 consolidated). See Actions 8 & 9 above.

ACTION 17: The Operator must submit the landfill gas combusted in the flare and engines separately as per permit requirements. The Operator must also provide the basis for the estimation provided. Please provide these requirements to NRW by 31/08/20.

ACTION 18: The Operator must update plans/procedures, management and training to ensure such figures are provided separately as required by the permit in the future. Please respond to NRW in writing to provide evidence of completing this action with updated plans/procedures by 31/08/20.

A topographical survey required by Condition 3.7.3 was completed on 5th & 6th February 2020 and submitted to NRW on 31/03/20. The submission appears incomplete with sheet 3 of 3 missing. The survey provided does not include any features, i.e. cover height of leachate wells etc. The total settlement for areas that didn't receive waste required by Condition 4.2.2(f) has been given as 9,520.778m³.

The additional volume of the landfill void that is occupied by waste required by Condition 4.2.2(e) has not been provided. This may be because the landfill has not been accepting waste into the landfill, although waste from on-site activities has been accepted.

As above NRW is of the opinion that Conditions 3.7.3 and 4.2.2 have been breached (G1 CCS = 3 and G4 CCS = 3 consolidated). See Actions 8 & 9 above.

ACTION 19: Please provide Sheet 3 of 3 of the topographical survey and the landfill void data required by Condition 4.2.2(e) to NRW by 31/08/20.

ACTION 20: The Operator must put measures in place to ensure the next annual survey is conducted on time and provided by 31/01/21 as required by the Permit. The survey must also include features such as cover height of leachate wells etc. and any new features. Please respond to NRW in writing to provide evidence of completing this action with updated plans/procedures by 31/08/20.

End of Report

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 only relating to the activity assessment
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.

What are suspended scores?

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 and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at 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.