

Compliance Assessment Report CAR_NRW0038845

Permit being assessed: BS6149IQ.

For: Pencoed Rockwool EPR/BS6149IQ, held by Rockwool Ltd

At: Rockwool Ltd , Bridgend , Mid Glamorgan , CF35 6NY.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 12/08/2021 between 10:00 and 14:00.

Parts of permit assessed: 1.1; 2,3; 3.1; 3.5; 4.1.2; 4.2; 4.3;

NRW Lead Officer: Richard Taylor, accompanied by Antony Leakey.

Report sent to: Victoria Hillman, SHE Manager on 24/11/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C2 - General Management - Management system and operating procedures	C2 Significant	1.1.1
E1 - Emissions - Air	C2 Significant	3.1.2
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C2 Significant	4.3.1
E1 - Emissions - Air	C3 Minor	3.1.2

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

Total number of non-compliances recorded	Total non-compliance score
4	97

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
C2	Review the Rockwool management system and approach to change control to identify gaps against current good practice. This should include, but not be limited to, changes to process and plant, control and data handling hardware and software, personnel numbers and seniority/competencies, maintenance regime, practices, and budget.	28/02/2022
E1	Review the current CEMs data handling and reporting systems against current good practice, including use of MCERTS DAHS and implementation of a rigorous data verification procedure.	28/02/2022
G4	Review Rockwool reporting procedures to ensure that all permit condition non-compliance, incidents, and events with	31/12/2021

Criteria	Action needed	Complete by
	potential for environmental impact are notified to NRW without delay. Implement any identified improvements and provide a summary of outcomes to NRW.	
E1	return to permit limits with immediate effect.	31/12/2021

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.

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

Rockwool Limited

Site inspection 12 August 2021, emissions and reporting review 21 September 2021

CEM data misreporting investigation

NRW was notified in October 2020 that during a period from June 2018 until July 2020 the reported CEMs data were incorrect and as a result 33 daily average periods exceeded the sulphur dioxide ELV on line 3 over this time frame. The issue was discovered when annual parallel measurement testing in June 2020 by a contractor showed that actual emissions were above the ELV for sulphur dioxide.

The delay in reporting the discrepancy to NRW was stated to be due to the time taken to reconcile the data errors. However, NRW should be informed immediately of such matters even if the root causes and extent of the problem is still under internal investigation. This enables NRW to make judgements on environmental impact and act if necessary.

The CODEL CEMs used at Rockwool can measure and report data in mg/m³ or parts per million by volume (ppmv) and carry out the necessary normalisation and oxygen correction calculations within the CEM software. Examination of the emissions processing data spreadsheet for June 2018 and the CODEL service engineer's work report for 7/8 June 2018 suggests that until 7 June 2018 the raw CEM data was exported in mg/Nm³ and only the measurement uncertainty subtracted before reporting. From 8 June 2018 the CODEL data export was configured to ppmv, but also unnecessarily corrected for temperature, as well as reference oxygen, but not converted to mg/m³ in the data processing spreadsheet. This is where the key error occurred.

For ideal gases to convert $\text{mg/m}^3 = \text{ppmv} \times \text{molecular weight of determinant/molar volume}$ at standard conditions ($22.415 \text{ m}^3/\text{kmol}$), so for SO_2 , $\text{mg/m}^3 = \text{ppmv} \times 2.86$

The additional temperature and pressure correction is approximately 2.1 $[(300+273.15)/273.15]$ times the CEM value, so as Rockwool believed the reading was in mg/m^3 , but it was actually in ppmv and corrected for temperature again (pressure correction is negligible), at the ELV of 2200 mg/m^3 the reporting spreadsheet and DCS showed $(2200 \times 2.1)/2.86 = 1615 \text{ ppmv}$, less the measurement uncertainty of 20% = 1292 ppmv, giving the impression that emissions were well within ELV. 300°C is the typical flue gas temperature for line 3.

The step change in the emissions data is clear to see in the reports but may not have been commented on as there was a concurrent problem with wet instrument air causing condensation on the CODEL IR optics leading to reading errors. New optics were fitted during the CODEL service visit and so the step change may have been attributed to this.

Nevertheless, upon requesting details of the Rockwool change management process followed as a result of the decision to make changes to the CEM reporting arrangements it became apparent that no formal procedures or process exists that examines and peer reviews plant and software modifications that do not affect product quality or are not part of larger project evaluation for SHE matters.

This is a potentially serious management system omission with wider implications for environmental protection, as well as health and safety management, in addition to ensuring data integrity for reporting to NRW and the public.

Training of personnel with responsibility for management of emissions monitoring and reporting was discussed. The Source Testing Association course for monitoring awareness: [Regulatory Monitoring Requirements for Process Operators](#) is included in training and development plans, although no recent refresher training has been undertaken.

Rockwool described how the immediate cause of the misreporting has been rectified. The CODEL CEM has been reconfigured to carry out normalisation and oxygen correction calculations internally minimising the manual data processing to be undertaken by Rockwool personnel. However, there is still no data integrity verification process and data during start up and shut down periods is excluded manually by reference to the oxygen level. This is normally carried out automatically by an MCERTS DAHS with reporting formats also generated automatically.

There were also elevated emissions data generated for line 3 NO_x , but this is alleged to be due to contaminated optics caused by the instrument air quality problems. The data issues have not been examined by NRW in detail, but subsequent emissions levels appear to support this claim. However, continuing acceptance of maloperation of a critical compliance instrument over this period is an indication that Rockwool was not managing this aspect adequately. NRW understands that regular servicing and replacement of the CODEL optics is now undertaken and instrument air drying improvements are being made.

A review of recent Rockwool air quality (AQ) modelling suggests that even at worst-case emission levels all the current AQ Standards for SO_2 will still be met (including the stringent

15-minute mean and annual habitats critical level), but the WHO 40 $\mu\text{g}/\text{m}^3$ 24-hour mean guideline could be marginally exceeded. However, the latter guideline is not currently used for regulatory purposes.

Calculation of the excess mass emissions during the period of misreporting suggests that an additional 10 tonnes of SO_2 was released, with a worst-case potential for an additional 350 tonnes. Overall mass release reporting to the E-PRTR database will also have been underestimated for the years 2018 and 2019 and 2020 if not corrected. This data will need to be reviewed and updated if necessary.

The ELV breaches constitute multiple category 3 non-compliance with permit condition 3.1.2 for actual and potential impacts, i.e. AQ impact couldn't have been much worse than it was because there was effectively no control over sulphur content being exercised in the raw materials fed to the cupola. However, the non-compliance associated with management of the CEMs and emissions data handling and reporting was potentially more serious (permit condition 1.1.1 category 2) because Rockwool lost control of their management of the CEMs data and good quality operator self-monitoring is an essential element of modern industrial emissions regulation. Furthermore, a robust management of change process is necessary to minimise the risk of errors and incidents with environmental implications and no such process is in place.

- **NRW award a Category 2 non compliance of permit condition 1.1.1 for change management and management of data for reporting purposes.**

The ELV category 3 non-compliances would normally have been allocated against each reporting quarter for each year, however, this has not been possible in this case as the ELV exceedances were undetected for a 2-year period. Given the cumulative extent of the ELV non-compliance (33 across 7 reporting quarters for a single pollutant);

- **NRW considers it to be appropriate to consolidate the cumulative SO_2 ELV exceedances into a single category 2 non-compliance with permit condition 3.1.2.**
- **NRW also issues a category 2 non-compliance with permit condition 4.3.1 for not immediately informing NRW of the incident.**

Failing to notify NRW immediately upon discovery of the potential misreporting of emissions data was considered to be potentially significant in its possible effects. The significant nature of this non-compliance is considered appropriate due to the potential for delays to prevent action to mitigate significant environmental impact under different circumstances.

A further potential non-compliance with permit condition 3.5.3 for failing to use an MCERTS certified DAHS has been disregarded on the basis that the CODEL SmartCEM and spreadsheet system used by Rockwool could be, but wasn't, implemented robustly to provide a similar, but not directly comparable, level of data and reporting integrity.

Actions required by date below;

1. With reference to Permit condition 4.3.1; Review Rockwool reporting procedures to ensure that all permit condition non-compliance, incidents, and events with potential for environmental impact are notified to NRW without delay. Implement any identified improvements and provide a summary of outcomes to NRW. **Due Date 31st December 2021**
2. With reference to Permit condition 1.1.1;
 - a. Review the Rockwool management system and approach to change control to identify gaps against current good practice. This should include, but not be limited to, changes to process and plant, control and data handling hardware and software, personnel numbers and seniority/competencies, maintenance regime, practices, and budget. **Due Date 28th February 2022**
 - b. Implement any identified improvements and provide a summary of outcomes to NRW. **Due Date 31st August 2022**
3. With reference to Permit condition 3.1.2;
 - a. Review the current CEMs data handling and reporting systems against current good practice, including use of MCERTS DAHS and implementation of a rigorous data verification procedure. **Due Date 28th February 2022**
 - b. Implement any identified improvements and provide a summary of outcomes to NRW. **Due Date 31st August 2022**
4. Also; to correct outstanding data errors with EP RTR reporting; Review annual mass release reporting to the E-PRTR database for all relevant substances for the years 2018, 2019 and 2020 and update if necessary. Provide details of any data amendments to NRW. **Due Date 31st December 2021**

CEMs quality assurance

During a brief discussion about quality assurance procedures applied by Rockwool to the CODEL CEMs it was established that NRW guidance produced in 2016 is being applied which sets out how the principles of the QA standard EN 14181 should be used for processes not subject to IED Chapter III or IV (large combustion plant and incinerators).

The Rockwool approach is as follows:

- Annual functional tests including linearity checks
- Annual zero verification
- Annual parallel testing using 3 x 30-minute SRM measurements over 1 day to develop a valid calibration function
- No QAL3 programme is undertaken

NRW has not undertaken recent reviews of the CEMS performance against these checks, but given the performance issues described above relating to damp instrument air affecting IR optics it is likely that these basic checks are not providing sufficient confidence in the emissions data produced.

These are minimum standards for CEMs used for demonstration of compliance with ELVs and the guidance gives examples of where additional QA measures may be required depending upon the spread of measurement data compared to the ELV, for example. It is also noted that the footnote to the current Table S3.1 states that AST/QAL2 and QAL3 procedures should be applied to CEMs, albeit with scope for reduced parallel measurements if agreed.

NRW requires Rockwool to review their CEMs performance against the current checks undertaken and provide summary evidence that this performance is acceptable. Does the annual parallel testing show that the IED standard 95% confidence interval *uncertainties* specified in permit condition 3.5.5 *are being achieved*? If necessary, a review of additional requirements of the EN 14181 standard is required with proposals for implementation.

ACTION: Rockwool to provide NRW with evidence of CEM performance based upon current checks and review the need for additional application of elements of the EN 14181 standard for CEMs QA and provide an update at next compliance meeting.

Valid daily average reporting

NRW has previously accepted that a day with less than 43 valid 30-minute average (short term averages – STA) periods should be treated as an invalid daily average for reporting purposes. This is derived from guidance intended to apply to mass burn incinerators to provide mitigation for STA variability due to the heterogenous nature of the waste fuel.

IED does not state how many valid STAs are needed in any particular process to form a valid day, but it does say how many invalid STAs due to CEMs reporting invalid data for incinerators (>5 invalid ½ hour means) and that is what has been replicated in the Rockwool permit.

The recent Data Acquisition and Handling Systems (DAHS) standard EN 17255 sets requirements for validity of STA and valid daily averages:

8.12 Long-term averages

Daily averages shall be calculated as the arithmetic mean of all valid VSTA. At least 6 h of the day shall be covered by valid VSTA to form a valid daily average.

Other long-term averages (LTA) shall be calculated as the arithmetic mean of all valid SSTA with the appropriate uncertainty subtracted within the appropriate period (SSTA or LTA) as laid down in national legislation. If not specified otherwise, at least 10 % of the LTA period shall be covered by valid SSTA to form a valid LTA.

NOTE 1 Some regulations require the formation of LTA on the basis of VSTA or daily averages with a specified minimum number of valid values.

NOTE 2 According to different regulation the averaging can be block or rolling with periods of a day, a week, a month, a quarter of a year or a year, depending on the type and application of the plant.

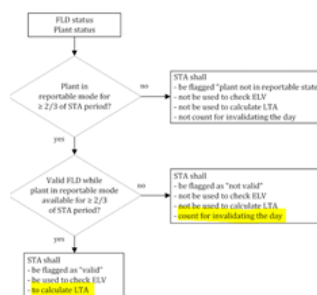


Figure 1 — Evaluation of validity of STA

Applying this standard to the Rockwool CO daily mean ELV exceedance on 11 March 2021,

the day was not invalidated due to >5 invalid STAs, there were 16 valid STAs when the plant was reportable and the plant was off for the rest of the day, so applying EN 17255-1 this could be considered a valid daily mean.

There may be a case to apply different requirements if emissions variability is inherent feature of the process. However, for stable process such as power stations valid daily means have been calculated based on 2 valid hours for gas turbines and 3 valid hours for coal plant, although these are now moving to the 6 hours specified in EN 17255-1. A brief review of Rockwool emissions data suggests that emissions variability is limited and driven largely by variation in oxygen levels which may be associated with raw material charging. UK regulators are starting to require adoption of the EN 17255 standard, and Rockwool will need to review the implications for CEMs data handling and reporting.

ACTION: Rockwool to review the implications of the EN 17255 standard for CEMs data handling and provide an update at next compliance meeting.

SO₂ emissions abatement

The 2200 mg/m³ ELV for cupola sulphur dioxide releases is permitted on the basis that process waste streams are recycled into the cupolas resulting in elevated emissions. This is understood to be the case at Rockwool except for pit slag which is lost from the process to prevent iron levels affecting product quality (see below).

However, NRW notes that compliance with the sulphur dioxide ELV is often achieved by reliance on subtraction of the uncertainty budget, especially for line 3, suggesting that there is insufficient headroom between process performance and the ELV. Rockwool confirmed that consideration is being given to provision of abatement to avoid loss of production associated with feed interruptions undertaken to avoid exceeding the ELV.

A cost benefit analysis of abatement costs against UK government environmental damage costs for sulphur dioxide may also demonstrate that abatement is cost effective.

ACTION: Rockwool to provide an update on sulphur dioxide abatement progress at next compliance meeting.

Pit slag review

Aspects of pit slag production were discussed to enable the material to be compared to iron-making blast furnace slag. Pit slag is primarily produced when iron is tapped from the cupolas and is itself high in iron content making it unsuitable for reprocessing into mineral wool. This suggests that it is a material that is discarded rather than produced to a particular specification for onward use, the iron content providing no advantage to the slag material for use as an aggregate and providing a purge stream to remove iron from the process.

Consequently, while the pit slag is similar to an iron-making blast furnace slag (BFS), NRW believes there are subtle differences between the Rockwool pit slag and blast furnace slag. Whilst the processes involved in the generation of pit slag are analogous to blast furnace slag, the material generated by Rockwool is mineral slag and requires its own individual assessment and consideration.

The steel slag Quality Protocol is not applicable as this material is very different to BFS. Quality Protocols were developed by a Government funded, Industry and Regulator collaboration project over 10 years ago and were for high volume wastes with multi-site producers and end uses. There are no plans to develop new Quality Protocols and many of the existing protocols are currently being reviewed by the Environment Agency. A Quality Protocol is unlikely to be considered for development for Rockwool pit slag due to the limited production volumes and largely single site source. It is also likely that any potential consideration of pit slag under this framework will take some time to complete and would incur a cost to your industry to fund the Regulator's contribution to their development and review. A bespoke, case by case assessment on the end of waste criteria can be undertaken by Rockwool and should achieve the same outcome as a Quality Protocol if the material is able to meet end of waste criteria. In addition to this, a Quality Protocol is for end of waste assessments and not for by-products.

Whether or not a particular material is regarded as a by-product or the end use has achieved "end-of-waste" is a decision for Rockwool to make based on its own interpretation of the legislation and case law, taking into account the environmental impact of any proposed use. NRW is comfortable that the onward use of the Rockwool slag as a water treatment filter bed material will not be considered a waste once leaving site and does not fall into the requirements of the Environmental Permitting regime. This results in the same outcome as if the material were considered to be a by-product, but with the additional stage of being considered a waste at the point it is discarded from the cupola furnaces, before potential processing into a secondary material product suitable for intended specific uses.

Rockwool will need to make decisions on other suitable outlets for the pit slag, including a proposed use as a secondary aggregate in landfill construction.

Please note that if Rockwool pursue the landfill engineering recovery route NRW will want to scrutinise the engineering specification for the intended use and see a demonstration of how the pit slag meets that specification. Also, Rockwool may want to discuss potential landfill tax liabilities with the Landfill Disposals Tax Customer Manager at the Welsh Revenue Authority to be sure of what evidence the WRA will require to demonstrate that it is exempt from landfill tax.

Note that inventories of materials that may be considered wastes should not be accumulated for more than 6 months. NRW understands that the current stock pile is approximately 2 years old.

ACTION: Rockwool to provide an update on pit slag inventory reduction and recovery options at next compliance meeting.

Line 1 restart

Line 1 is scheduled to resume operation in late September and Rockwool requested that periodic emissions testing begin in 2022 as the remaining operating period in 2021 is only 3 months.

A review of the previous emissions data from early 2020 for line 1 cupola demonstrated that periodically monitored emissions were generally low.

Line 1 particulate probe has been checked by contractor Envea in August 2021 and the probe was found to be in good condition. Instrument self-checks were performed and were all within parameters. Line 1 probe will be reinstalled into the stack prior to restart as it was taken out of the stack whilst cupola 1 was mothballed to store it in a controlled environment.

CODEL were on site in August 2021 and completed a visual inspection of Line 1 CEMS unit for SO₂, NO_x and CO. The optics will be changed, and span gas checks undertaken prior to start up.

NRW will review emissions data following the restart and confirm that periodic emissions testing can begin in 2022 if appropriate.

Complaints and incident review

An odour complaint was received on 19 August 2021. Line 3 cupola was restarting around the time of the reported odour. A review of emissions data for line 3 and line 12 did not indicate any abnormally elevated emissions. A review of start-up operations is proposed by NRW to understand if there are potential areas for reduction of odour impact.

South Wales Industrial Cluster

During discussions on participation in the SWIC it emerged that a pilot trial is being undertaken using a PSA unit on a cupola exhaust stream to test carbon dioxide removal capability. While this may not have environmental impact implications, such plant modifications should be discussed with NRW in advance of implementation in case permit variation is required. Rockwool expect this project to commence in Q1 2022.

ACTION: Rockwool to provide an update on the trial at next compliance meeting.

Emissions review

An ammonia ELV exceedance on 28 June 2021 was reported following extractive monitoring of emissions from the afterburner release point A12. The result was 50% over the ELV, an indication that the unit was not operating as expected. Corrective actions identified included extensive cleaning and inspection of the plant suggesting that this has been neglected or not controlled though a planned maintenance programme. The 6-month interval between testing means that high emissions may have persisted for some time.

The release rate for this stack is low and review of air quality impact shows that short- or long-term environmental assessment levels will not have been exceeded. The incremental mass emission over the period is estimated to be around 300 kg and will not have contributed significantly to nutrient deposition rates. Therefore, the non-compliance with permit condition 3.1.2 is a minor category 3. The root cause remains unclear and a review of the plant performance and maintenance regime is required to ensure that a repetition does not occur.

- **NRW issue a Cat 3 non compliance of permit condition 3.1.2 for a breach of the ammonia ELV on Line 12 on 28th June 2021.**

ACTION: Rockwool to review release point A12 abatement plant performance and maintenance regime. Implement any identified improvements necessary and provide a summary of outcomes to NRW at next compliance meeting.

Monitoring data for Q3 and Q4 2020, 2020 annual performance indicators, Q1 and Q2 2021 and the annual report for 2020 (condition 4.2.2 compliance) has been reviewed and no breach of permit conditions was identified other than those already identified and discussed in this report or previous reports.

Waste reporting form refers to “controlled” waste, whereas this should be “non-hazardous” in accordance with modern legislation. Notes referencing any WM3 assessments that demonstrate that a particular waste stream is non-hazardous or hazardous should also be included in this form. Breakdown of waste stream by type/source should also be as narrow as possible and no waste streams should be deliberately mixed on site or during collection.

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 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.