

Agenda – Petitions Committee

Meeting Venue:

Committee Room 3 – Senedd

Meeting date: 22 September 2025

Meeting time: 14.00

For further information contact:

Gareth Price – Committee Clerk

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1 Introductions, apologies, substitutions and declarations of interest

(Pages 1 – 32)

2 Evidence session (Panel 1) – P-06-1510 Direct NRW to revoke the environmental permit and ensure the closure of Enover's, Hafod Landfill Site in Wrexham

(14.00 – 15.00)

(Pages 33 – 158)

Panel 1: Wrexham Council & Natural Resources Wales

Natural Resources Wales:

- Sara Pearson, Operations Manager
- James McClymont, Industry and Waste Regulation Team Leader

Wrexham Council:

- Cllr Hugh Jones – Lead Member for Planning and Public Protection
- Charlie Pope – North Wales Minerals and Waste Planning Service
- Toby Zorn, Environmental Health & Housing Standards Team Lead

Break (10 minutes)



3 Evidence session (Panel 2) – P-06-1510 Direct NRW to revoke the environmental permit and ensure the closure of Enover's, Hafod Landfill Site in Wrexham

(15.10 – 15.55)

Panel 2: Enover

- Mark Silvester, Chief Executive Officer
- Ian Craven, Regional Manager

Break (5 minutes)

4 New Petitions

(16.00 – 16.15)

- 4.1 P-06-1515 Urgent installation of CCTV at Porth Train Station and bridge
(Pages 159 – 162)
- 4.2 P-06-1516 Enable Cardiff University to keep the Nursing degree course
(Pages 163 – 170)
- 4.3 P-06-1517 Help Cardiff University to keep their Modern Languages degree courses
(Pages 171 – 177)
- 4.4 P-06-1519 Implement safety measures at the A477 Red Roses junction to reduce accidents and stop any fatalities
(Pages 178 – 189)
- 4.5 P-06-1520 Stop all foreign aid payments from the Welsh Government including to "Size of Wales"
(Pages 190 – 200)
- 4.6 P-06-1531 Mandate Comprehensive and Specific Food Labelling to Support Dietary Needs and Allergies
(Pages 201 – 207)

4.7 P-06-1536 Introduce inflation cap to all Local Authority council tax increases in Wales

(Pages 208 – 217)

4.8 P-06-1539 Use English before (or instead of) Welsh in important public messages in Wales

(Pages 218 – 227)

5 Updates to previous petitions

(16.15 – 16.30)

5.1 P-06-1258 Make individuals in Wales with Hidden disabilities eligible for the Blue Badge

(Page 228)

5.2 P-06-1380 Make Blue badge Applications Lifelong for individuals who have a lifelong diagnosis

(Pages 229 – 253)

5.3 P-06-1525 Preserve the unique character of the Monmouthshire and Brecon Canal for the future generations of Wales

(Pages 254 – 262)

6 Papers to note

(16.30 – 16.35)

6.1 P-06-1391 Introduce regulation of the dog grooming sector, to protect the welfare of dogs and rights of owners

(Pages 263 – 264)

6.2 P-06-1527 Review dog walking restrictions on Welsh beaches and issue guidance to relevant bodies

(Pages 265 – 266)

6.3 P-06-1489 Legislate to ensure swift bricks are installed in all new buildings in Wales

(Pages 267 – 268)

6.4 P-06-1335 Welsh Government should take steps to ensure vulnerable adults without bank cards can pay with cash

(Pages 269 – 270)

6.5 P-06-1463 Continue to fund school police officers who educate children and support schools

(Page 271)

6.6 P-06-1528 Prevent Powys patients who are treated in English hospitals from facing increased waiting times

(Pages 272 – 273)

6.7 Correspondence to Mark Isherwood MS on Fifth Senedd Petition P-05-784

(Pages 274 – 276)

7 Motion under Standing Order 17.42(ix) to resolve to exclude the public from the meeting for the remainder of today's business

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P-06-1510 Direct NRW to revoke the environmental permit and ensure the closure of Enover't's, Hafod Landfill Site in Wrexham.

Y Pwyllgor Deisebau | 22 Medi 2025
Petitions Committee | 22 September 2025

Reference: SR25/11931-1

Petition Number: P-06-1510

Petition title: Direct NRW to revoke the environmental permit and ensure the closure of Enover't's, Hafod Landfill Site in Wrexham.

Text of petition:

The Hafod Landfill Site has caused community distress for 18 years, making it Wales' longest running environmental campaign. Despite efforts by residents and elected representatives, the site continues to emit noxious odours, creating an unacceptable statutory nuisance. NRW are responsible for environmental protection and has failed to take meaningful enforcement action, relying instead on technical justifications and vague assurances. This is not just regulatory inertia, but governance failure.

In 2024, the odour and air pollution reached distressing and crisis levels. Families were unable to open their windows, children are forced to play indoors. If NRW regulatory framework allows a site to emit persistent and overpowering odours whilst remaining compliant, then the regulations are clearly not fit for purpose. Their own last Inspection reported key failings such as a non-operational gas engine, increasing the release of landfill gases. Temporary capping of landfill cells that fail to contain odours. Persistent leaks from multiple area of the site. Delays in infrastructure upgrades, leaving the site vulnerable to excessive emissions. In May 2020, a substantial fire broke out, burning for several days and producing thick black smoke. NRW recorded air pollution levels 14 times above the permitted level. If NRW



cannot hold Enovert accountable, and they have failed to do so in 18 years, then an independent inquiry into their effectiveness as a regulatory body is urgently needed.

The text provided above is submitted by the petitioner. The petitions team make every effort to ensure it preserves their authentic voice. This text has not been verified for accuracy, or errors, and may contain unverified opinions or assertions.

1. Background

This briefing supports the Petitions Committee's short inquiry into the Hafod Landfill site. It updates the earlier briefing published for the Committee's first consideration of this petition on 28 April 2025.

Mersey Waste Holdings was granted permission to run the former Hafod quarry site as a landfill in 2004, following a public inquiry. Wrexham County Borough Council (CBC) had previously rejected the company's application. Since November 2008, it has been operated by Enovert North Ltd. (formerly Cory Environmental Limited). The landfill operates under an environmental permit (EPR-PP3139GB) issued by Natural Resources Wales (NRW). NRW regulates waste sites in line with its regulatory principles.

Hydrogen Sulphide (H₂S) is a gas that is released during the decomposition of organic matter and is associated with landfill odour. As set out in this April 2025 local authority scrutiny report, there were a significant number of complaints relating to odour from the site during 2024. The petitioner has called for NRW to revoke the site's environmental permit.

Direct NRW to revoke the environmental permit and ensure the closure of Enovert's, Hafod Landfill Site in Wrexham.

In a [February 2025 newsletter update](#), NRW explained the circumstances under which it is able to revoke an environmental permit:

Hafod Landfill operates under an Environmental Permit, which sets out the types and amounts of waste that can be accepted at the site. The permitting regulations do not allow us to include restrictions on where waste comes from.

We only revoke permits if we believe the operation poses a serious risk to the environment or human health, and if all other measures to reduce the odour have been exhausted. At present, the operators are still working through a number of actions to address the issues, and we are regulating them closely.

Closing the site would not immediately get rid of the odours, as leachate and landfill gas would still need to be managed to reduce the potential for offsite odours.

Our regulatory actions are guided by our published regulatory principles, ensuring a balanced and proactive approach.

NRW summarises the findings of its site inspections, audits, and monitoring activities in Compliance Assessment Reports. A [February 2025 compliance report](#) for the Hafod Landfill details 5 'non-compliances' of environmental permit conditions, relating to:

- leachate management;
- landfill gas;
- chloride monitoring; and
- surface water monitoring.

There were 26 instances of landfill methane emissions exceeding the permitted amount during the final quarter of 2024.

An [NRW webpage](#) outlines its ongoing regulatory actions for the site, including:

- regular site inspections;
- reviewing Enovert's management procedures and action plans; and
- working with Wrexham CBC to ensure air quality and monitoring meets [Welsh Government standards](#).

NRW says it told Enovert to take action to reduce long-term fugitive (unintentional) emissions in late 2024. It also [issued Enovert with an Enforcement Notice](#) on 21 December 2023, which included "several actions that needed to be taken to address the odour complaints reported between October and December 2023". NRW says Enovert complied with the notice, completed related works, and updated its action plan related to its management procedures.

Its March 2025 update says Enovert has installed new infrastructure to increase the volume of gas being collected from the site, and that further air quality monitoring equipment will be installed in the near future. On odour emissions to residential areas, NRW says:

“Under the conditions of the Environmental Permit, if the operator is taking appropriate measures to control odour, a breach of the permit does not occur, even if some odour is still detectable. The site operator has identified appropriate measures within their odour management plan to manage odour emissions; however, we understand that there continue to be impacts on the community. We are closely reviewing their plan to determine if any additional measures are needed to further mitigate odours.”

The Hafod Landfill Stakeholder Group was established in early 2025, following a rise in odour complaints. The Stakeholder Group includes Enovert, NRW, Wrexham CBC councillors and officials, and community council representatives. It had its first meeting on 21 March 2025. Additionally, the Hafod Liaison Group was established over 20 years ago as a forum for dialogue between the operator and the local community. It is chaired by a local councillor and includes Enovert, NRW, local Wrexham CBC councillors and officials, community councillors, and four local residents.

In its most recent (May 2025) update, NRW says the number of odour incidents has “shown a steadily decreasing trend as improvement works are completed”.

2. Written evidence submitted to inquiry

The Petitions Committee carried out a consultation with key Hafod Landfill stakeholders in July and August 2025. This section summarises the written responses the Committee received.

2.1. Enovert

Enovert's submission details its waste management role and how it is regulated. It says the degradation of waste in landfill produces landfill gas and leachate. The landfill gas is collected for use as fuel, whilst the leachate is stored in tankers for later processing at wastewater treatment facilities. Enovert provides detailed information on the types of waste it accepts and the source of that waste.

In relation to odour, Enovert says it takes complaints seriously and investigates and reacts to each one. It says it took remedial action both before and after it was issued a Statutory Notice by NRW in December 2023, and that it complied with all actions on agreed timescales. Its response includes a list of works it undertook between October 2023 and July 2025. Enovert says it installed four monitoring stations around the site, and it has appointed “leading independent environmental consultants” to assess the data. It says it

Direct NRW to revoke the environmental permit and ensure the closure of Enovert's, Hafod Landfill Site in Wrexham.

followed the consultancy's recommendation to install "additional diffusion tube monitoring devices to provide accurate detail in respect of actual exposure risk".

Enovert says that, following a meeting with the Wrexham CBC Homes & Environment Scrutiny Committee, it agreed to part-fund an air quality monitoring scheme. The scheme includes monitoring hydrogen sulphide gas on site and in the community. In relation to publishing that data, Enovert says:

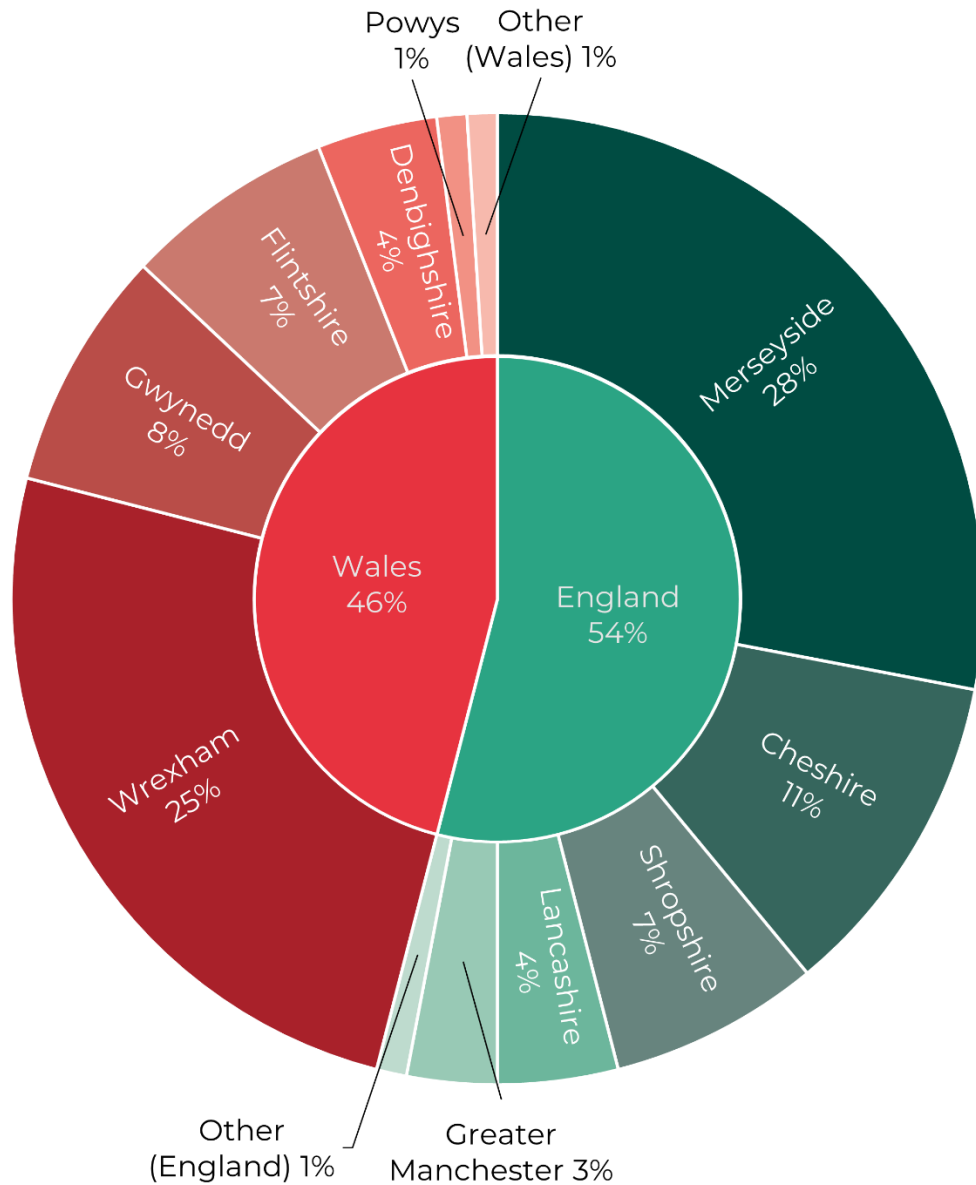
"The monitoring exercise needs to gather a sufficient body of data to allow proper assessment of the air quality environment. We are awaiting the data from the instruments for the third monitoring period at the time of writing. We have agreed to provide the latest monitoring data summary, with the benefit of the third round of monitoring detail, to the Senedd Petitions Committee by 15th September for inclusion in our evidence."

The latest data is not available at the time of preparing this briefing. However data for March 2025 can be found in a [report produced for the scrutiny Committee](#).

The response goes on to rebuke specific claims made in the petition. It also details the volume of landfill gas extracted from the site since November 2023, which has stabilised and (on average) fallen slightly.

Enovert provides information on the source of waste inputs to Hafod during 2024. It says around 10% of all waste is residual 'black bag' waste diverted from Energy from Waste plants. Just over half of the 2024 input (54%) came from England, with most of the remainder coming from north Wales. This is summarised below.

Hafod landfill 2024 inputs by nation and local authority area.



Source: Enovert

2.2. Public Health Wales

Public Health Wales (PHW) submitted evidence detailing its involvement with Wrexham CBC in relation to odour at Hafod.

PHW provides advice on guideline values for assessing public exposure to hydrogen sulphide over different time periods. It says it does not need to be informed of routine findings “unless the data shows significant concerns e.g.

concentrations are routinely above the exposure standards". It also advises that occupational exposure standards are inappropriate for assessing public exposure.

PHW also provides information on assessing the concentration of Volatile Organic Compounds (VOC) in air, which does not include hydrogen sulphide. It suggests benzene could be used as a conservative proxy for assessing the health risks of VOC unless Wrexham CBC can establish "an informed estimation of what VOCs are likely to be present".

2.3. Natural Resources Wales

NRW says Enovert's Environmental Permit "requires the operator to prevent odour off site or, where that is not possible, to keep it to a minimum". It says Enovert's Odour Management Plan describes how it will achieve this condition. And that any updates to its Plan must be assessed by NRW officers.

The response details NRW's approach to odour investigation, which includes site investigations and a odour intensity scale. It says a breach will only be recorded when on-site activities are likely to cause off-site pollution, and the operator is not taking all appropriate measures to control odour.

NRW says it can only initiate the closure of a landfill "when the management of an operational site is poor and further operation of the site may result in significant, long-term pollution". It says a closure notice is only used "when other enforcement options have been exhausted".

NRW provides a timeline of significant events in the regulatory history of Hafod, which are summarised in the table below:

Recent history of NRW's regulatory activity at Hafod

Date	Event
October 2023	Large increase in odour incident reports.
21 December 2023	NRW issued a Compliance Notice to Enovert to address odour.
31 January 2024	NRW satisfied that Enovert had complied with Notice.
8 March 2024	More gas emissions identified, Enovert proposes more remediation measure.
13 May 2024	NRW follow-up visit finds overall improvement, but some transient odours still detected.

Direct NRW to revoke the environmental permit and ensure the closure of Enovert's, Hafod Landfill Site in Wrexham.

November 2024	NRW's Landfill Emissions Reduction Project (LERP) team audits Hafod, gives recommendations and actions to Enovert in a Compliance Assessment Report.
December – January 2025	Escalation in odour incident reports. NRW officers confirm offsite odour is present.
After January 2025	Odour incidents reports decrease. NRW makes unannounced inspections and site audits. NRW considering additional enforcement on leachate.

NRW also provided a more [detailed history of recent enforcement action](#) to Wrexham CBC's Home and Environment Scrutiny Committee meeting on 29 April 2025.

2.4. Wrexham CBC

Wrexham CBC's submission to the inquiry describes the history of the site and the council's work in addressing community concerns about the landfill.

Its Homes and Environment Scrutiny Committee considered complaints about the site during meetings in June 2024 and April 2025. It also produced a report in October 2024. Key recommendations arising from the most recent meeting include:

- consideration of another update report in 6 months – the report should detail any site-related toxicity and associated health impacts;
- the council should explore expanding air quality monitoring in the community; and
- if monitoring shows odours “above accepted limits”, Wrexham CBC should explore its powers under the *Environment Protection Act 1990* (the 1990 Act) to tackle these.

Wrexham CBC says its officers have enforcement powers to tackle ‘statutory nuisance’ under the 1990 Act, but its policy is for the organisation with primacy (in this case NRW) to implement formal actions. It says any local authority-led prosecution would require the consent of the Welsh Ministers.

The Council says its officials determined the best options for air quality monitoring for hydrogen sulphide and volatile organic compounds. Four AQMesh Pod monitors were installed by Enovert around the Hafod Landfill in February and March 2025, and are operated by the company. An additional monitor was installed and is operated by Wrexham CBC at the Johnstown Community Centre, and a second monitor is due to be installed at the Johnstown and Nant Parc Bowling Pavilion. Data from monitors “can be checked in real-time by [Wrexham CBC] Public Protection, NRW and Enovert personnel”. However, Wrexham CBC qualifies the interpretation of this data:

"It is important to stress that the data from AQMesh Pods is qualitative. Quantitative data can only be provided when a stringent QC plan is in place with access to reference instruments. The options to implement this process is being pursued with Enovert and Geotechnology."

In addition to the AQMesh Pods, Wrexham CBC says hydrogen sulphide diffusion tubes have been co-located with the monitors and also deployed in other nearby locations. It says this is "to determine the accuracy of the real time monitors and check for other sources of H₂S".

Data interpretation is to be done through a company called Geotechnology, which is being employed by Enovert. It says reports are being provided to the Council, NRW, and Enovert, and "will be accessible to the public via NRW's citizen web pages". It is unclear whether the raw data itself will be published. Wrexham CBC says it has altered its interpretation of hydrogen sulphide thresholds following correspondence with Public Health Wales, and it will now compare readings to [World Health Organisation \(WHO\) air quality guidelines](#) and [Acute Exposure Guideline Levels \(AEGs\)](#).

Wrexham CBC officers conducted daily assessments of odour levels around Hafod Landfill from mid-July to mid-August 2025. In 85% of assessments, no odour was detected. When odour was detected, this was most commonly at one of 3 sites immediately adjacent to the landfill on its eastern boundary. Wrexham CBC says its results "indicate that no statutory odour nuisance currently exists, relating to the Hafod landfill site at the current time".

2.5. Wrexham councillors

Three Wrexham CBC councillors representing wards around Hafod Landfill submitted a joint response to the Committee's inquiry, they were:

- Cllr David A Bithell (Deputy Leader of the Independent Group);
- Cllr Steve Joe Jones (Independent Councillor); and
- Cllr Dana Davies (Leader of the Labour Group).

The response says there have been fewer complaints during 2025 compared to previous years and that Enovert has recently been more proactive in working with other stakeholders. However, it caveats this by saying public communication needs to improve "to rebuild trust and demonstrate that action is being taken when problems arise". The Councillors say they support "measures which will reduce odour, provide public health assurance, minimise complaints, and ensure accountability", emphasising the need for ongoing support and oversight.

2.6. Residents

The Petitioner wrote to the Committee asking for clarity from NRW and Wrexham CBC in five areas:

- the assessment of off-site health and nuisance impacts by NRW;
- the exercise of statutory powers by Wrexham CBC;
- the transparency of monitoring datasets;
- enforcement in relation to hydrogen sulphide levels; and
- perceptions of whether regulators are acting to protect the public.

Another resident responding to the Committee says that Enovert and NRW have sometimes attributed odours to agricultural activity, rather than the landfill.

Both the petitioner and other resident suggest that a recent decrease in complaint reporting to NRW may be attributable to “complain fatigue”, where residents no longer report odours “because they now feel that it is a waste of time”.

Residents expressed concern about their lack of representation in the Hafod Stakeholder Group, which was established earlier this year.

3. Welsh Government action

In his response to the petition, the Cabinet Secretary for Climate Change and Rural Affairs, Huw Irranca-Davies MS, says he met with NRW officials and Enovert senior management to discuss the Hafod landfill site on 19 March 2025. He says the site's issues are regulatory and operational, so NRW is “best placed to determine the appropriate regulatory action and I therefore do not feel it is necessary to direct NRW to revoke the permit.” Enovert's submission says the Cabinet Secretary wrote to the company after the visit:

“...to encourage Enovert to ensure compliance with the site's Environmental Permit through engagement with NRW, and the importance of engaging with the public regarding any necessary maintenance and infrastructure works at the site”

4. Welsh Parliament action

The Petitions Committee initially discussed this petition on 28 April 2025. On 16 June 2025, it agreed to hold a short inquiry into outstanding issues related to the

Direct NRW to revoke the environmental permit and ensure the closure of Enovert's, Hafod Landfill Site in Wrexham.

site. This involved inviting Enovert, NRW, and Wrexham CBC officials to give oral evidence to the Committee.

On 14 January 2025, Gareth Davies MS asked the Trefnydd for a statement related to the site, specifically raising constituent concerns about a large amount of waste being brought from England. He asked:

...could the Cabinet Secretary for climate change outline how the Welsh Government is working with the UK Government and local authorities in England to ensure that residents in north Wales do not have to pay for the failures of local authorities in the north-west of England?

The Cabinet Secretary for Social Justice, Trefnydd and Chief Whip, Jane Hutt MS, responded:

You've raised a very specific question and issue for the Cabinet Secretary and Deputy First Minister, and he will find an appropriate way to respond to that. Thank you for raising it.

On 28 January 2025, Mark Isherwood MS asked the Trefnydd for a statement on the Hafod landfill, citing Johnstown constituent complaints about smells and NRW's "apparent lack of action in stopping it". The Trefnydd said the point "will be recorded with the Cabinet Secretary for Climate Change and Rural Affairs".

On 10 June 2020, following a fire at the landfill site, Llyr Gryffydd MS asked the then-First Minister, Mark Drakeford MS, for an independent inquiry into the cause of the fire and for the landfill's closure in the meantime. The First Minister said multiple authorities have responsibilities to provide reports about the fire, and "the Welsh Government will consider those reports and then decide what further action may be needed."

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.

By virtue of paragraph(s) vi of Standing Order 17.42

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Senedd Inquiry Submission

Petition P-06-1510: Public Exposure to Hydrogen Sulphide at Hafod Landfill

Sumbitted : 21st August 2025

Prepared by: Steve Gittins – Resident of Wrexham On behalf of affected communities

Submitted to: Senedd Petitions Committee Welsh Parliament (Senedd Cymru)

Five Key Questions for the Committee

Residents remain exposed to Hydrogen Sulphide above World Health Organization (WHO) guidelines. Natural Resources Wales (NRW) and Wrexham Council have failed to close a glaring regulatory gap: NRW limits its role to permit compliance inside the site boundary, while Wrexham Council assesses off-site impacts using inappropriate occupational exposure limits (OELs). The result is that no authority is safeguarding the public under the correct WHO residential standard of 5 ppb.

The Committee must ask:

1. **Regulatory Gap:** Why does NRW refuse to address off-site health and nuisance impacts, claiming they are “**not a requirement of the Environmental Permit**”? Why has Wrexham Council compounded this failure by applying occupational exposure limits (OELs), designed for healthy adult workers, in a residential community, instead of adopting the WHO guideline of 5 ppb?
2. **Council Abdication:** Why has Wrexham Council deferred to NRW’s **narrow permit remit** rather than exercise its statutory duty under public protection law to investigate and act on off-site nuisance and health risks?
3. **Data Withholding:** When will NRW and Wrexham Council jointly publish the full, unredacted monitoring **datasets promised to residents**? How can the continued delay be justified when transparency is essential for independent scrutiny and public trust? Monitoring commenced on 1st March, and no data has been released from the perimeter of the Lanfill site since, and only one data set in March, which demonstrated non-compliance with WHO guidelines 23% of the time.
4. **Health Advisory Failures:** How do NRW and Wrexham Council respond to the statement by Kristian James of Public Health Wales — that residents should just vacate the area for “respite” when Hydrogen Sulphide levels exceed WHO guidelines, and why has there been no enforcement to eliminate the cause of these breaches?
5. **Status Quo Protection:** Given repeated expressions of concern by Council members, how do both NRW and Wrexham Council explain their reliance on vague technicalities that preserve the harmful status quo? Does this not create the impression that the operator is being protected rather than the public, by running with the foxes and hunting with the hounds.

1. The Regulatory Gap: Permit Compliance vs. Public Exposure

- **NRW’s position:** On 11 August 2025, NRW stated: “Hydrogen sulphide monitoring off-site is not a requirement of the Environmental Permit.” This allows the operator to claim compliance while residents are exposed to fugitive emissions.
- **Council’s position:** Wrexham Council Public Protection Officers defer to NRW’s “primacy” and assess exposure using OELs intended for occupational health, not the WHO community standard of 5 ppb (30-min average).
- **Effect:** Neither authority applies the correct benchmark. This leaves residents in a regulatory void where no public authority accepts responsibility for enforcing safe community standards.

Table: NRW’s Regulatory Principles vs. Hafod Reality

NRW Principle	Intended Purpose	Observed Reality at Hafod
Deliver outcomes	Improve well-being	Odours persist; outcomes undefined and unmet
Be intelligent	Challenge poor practice using evidence	Data shows breaches; no decisive action taken
Hold operators accountable	Enforce compliance and protect communities	NRW defers to technicalities; enforcement is absent
Use full range of tools	Apply legal and collaborative mechanisms	Permit remains intact; penalties not applied
Be flexible and clear	Adapt to conditions and communicate openly	Odour plans unchanged; responses vague and passive
Ensure transparency	Share data and decisions with the public	FOI barriers; updates infrequent and incomplete

2. Engagement or Evasion?

Claims of “community engagement” are contradicted by the following facts:

- **NRW updates:** Only four published in nine months, repeating platitudes with no new data.
- **Liaison Committee:** Described by members as a “waste of time.” Minutes are incomplete or missing. Councillor David Bithell admitted he had only “brief notes.”
- **FOI barriers:** Residents forced to constantly use FOI requests to access even partial records.
- **Complaint fatigue:** Residents openly stated they no longer report odours due to lack of feedback. NRW has refused to offer anymore updates, due to current investigations and improvement plan implementation. After 19 years of protests, they still prevaricate, and kick the can down the road.

This is not engagement — it is institutional evasion.

3. Human Rights and the Walleys Quarry Precedent

In *R (Matthew Richards) v Environment Agency and Walleys Quarry Ltd*, the High Court found that excessive Hydrogen Sulphide posed a risk to life and family life under Articles 2 and 8 of the European Convention on Human Rights.

Hafod presents an even stronger case, with nearly two decades of emissions. Residents report headaches, nausea, respiratory irritation, anxiety, and disrupted family life.

The failure of any authority to adopt WHO guidelines means that the State is failing in its positive duty to protect residents' health and well-being.

4. Rebuttal to Liaison Committee Minutes (17 June 2025)

- Declining complaints are cited as evidence of improvement, when in reality they reflect complaint fatigue.
- The 21 Dec 2023 NRW Enforcement Notice — a landmark action — is not even mentioned.
- Routine compliance works are misrepresented as improvements.
- Health concerns dismissed with “see your doctor.”
- Monitoring rollout is reactive, incomplete, and lacks independent oversight.

This is historical revisionism and institutional sanitisation, not genuine accountability.

Conclusion and Recommendations

The Hafod case demonstrates:

- A regulatory gap where NRW hides behind permit boundaries and Wrexham Council uses irrelevant OELs instead of WHO community thresholds.
- A failure of engagement, where residents face evasion, missing data, and FOI obstacles.
- A failure of regulatory principles, with NRW unable or unwilling to enforce outcomes.
- A breach of human rights, where families are left exposed for 19 years without remedy.

The Committee should:

1. Require NRW to address off-site impacts under its statutory duty of well-being.
2. Require Wrexham Council to apply the WHO 5 ppb guideline (not OELs).
3. Mandate publication of full monitoring data via a public dashboard.
4. Examine the accountability of Public Health Wales.
5. Recommend revocation of the Environmental Permit, as 19 years of fugitive emissions prove the operator cannot control this nuisance and residents cannot endure another 35 years.

Addendum to Submission – Senedd Inquiry Ref: P0-60-1510

In addition to the five questions already submitted regarding the oversight of Hafod Landfill, I wish to add the following question for consideration by the Inquiry:

Proposed Additional Question

Given that Hafod Landfill has operated since before the year 2000, when disposal of polychlorinated biphenyls (PCBs) was poorly regulated, can Natural Resources Wales, Wrexham Council, and Enovert confirm whether PCB-containing wastes were ever historically deposited at the site, and whether monitoring for persistent organic pollutants such as PCBs is included in current leachate, groundwater, soil, and air testing regimes, and if such monitoring is not undertaken, what is the justification for that omission?

Rationale for Question

- PCBs are internationally recognised as toxic, persistent organic pollutants under the Stockholm Convention, and were widely used in industrial equipment, paints, and construction materials prior to their prohibition in 2000.
- Landfill records and waste acceptance procedures prior to that date were significantly less stringent, creating the possibility that PCB-containing wastes may have entered Hafod.
- Unlike hydrogen sulphide, PCB contamination does not manifest as odour but poses serious long-term health and environmental risks through air, soil, water, and food-chain exposure pathways.
- It is therefore essential to establish:
 - Whether PCB-containing waste was historically deposited.
 - Whether NRW or the operator monitors for such pollutants.
 - If not, why this gap in oversight has been allowed to persist.

Petition P-06-1510 Direct NRW to revoke the environmental permit and ensure the closure of Enover's, Hafod Landfill Site in Wrexham

Submission by Wrexham County Borough Council

Dated 28th August 2025

1. Overview and Purpose

To brief Members of the Welsh Parliament, Petition Committee on the work undertaken by Wrexham County Borough Council in relation to concerns raised by the local community against Hafod Landfill Site, operated by Enover Ltd. The report will outline:

- Historical summary
- Community Engagement
- Wrexham Council Scrutiny Committee
- Wrexham Council Notice of Motion
- Wrexham Council's Regulatory Role
- Complaints received by Wrexham Council
- Environmental Monitoring & Assessment
- Conclusion

2. Hafod Landfill Site History Summary

2.1 Hafod Landfill site is a former clay quarry. The earliest planning permission for clay extraction dates to 5 November 1952. Further planning permissions relating to clay extraction were granted in 1959, 1973, 1979, 1988, 1992, 2001 and 2006. Mineral extraction from the site created the void that was subsequently utilised as a landfill site.

2.2 On 6 December 1990, a planning application was submitted to the former Clwyd County Council seeking planning permission to infill the void created by mineral extraction with domestic, commercial and industrial waste, the erection of an associated site control building, engineering operations and ancillary development, together with the restoration of the site to agriculture and amenity once landfill operations were completed. Clwyd County Council refused planning permission on 13 November 1991. The applicants exercised their statutory right of appeal, and their appeal was subsequently allowed by the Secretary of State for Wales on 10 July 1995.

2.3 Following the appeal decisions, further applications were submitted to Wrexham County Borough Council proposing the following:

- Relaxation of a condition imposed on the 1995 planning permission to allow additional time for the submission of certain reserved matters. Granted 17 September 1998.

- The formation of a new vehicular access (amendment to conditions imposed on the 1995 planning permission). Granted 17 September 1998.
 - Approval of matters reserved for subsequent approval by the 1995 planning permission, including details of Great Crested Newt translocation, wheel wash facilities, surface water management, site control area, fencing, dust control and landscaping. Granted 11 March 1999
 - Construction and operation of clear water storage lagoons. Granted 14 May 2002.
- 2.4 On 29 October 2003, two identical applications were submitted to vary a planning condition imposed on the 1999 reserved matters approval to substitute amended phasing, post settlement and restoration plans.
- 2.5 The Stryt Las a'r Hafod Site of Special Scientific Interest (which was designated after planning permission had been granted) and the (then Johnstown Newts Site Special Area of Conservation) occupied part of the area where landfilling works had originally been permitted. The amended plans proposed a reduced area of landfilling, this removing the SSSI/candidate SAC from the landfill area. The overall height of the pre-settlement height of the landfill site, once works were completed, was proposed to remain as previously permitted.
- 2.6 The first of the two applications was refused by Wrexham County Borough Council on 5 March 2004. The second application was subject to an appeal on the grounds of non-determination. The appeal was allowed on 26 August 2004; however the decision was later quashed by the High Court on 28 June 2005.
- Landfilling operations commenced at the site in 2006.
- 2.7 On 2 May 2007 two Modification Orders made under Section 97 of the Town and Country Planning Act 1995 were confirmed by Welsh Ministers. The effect of the Orders was to modify the landfill planning permission by excluding the area of the SSSI and the SAC (formally designated in December 2004) from the landfill area, which had both been designated since the grant of planning permission. The Modifications were sought by Wrexham County Borough Council in order to protect the integrity of the statutory protected sites.
- 2.8 Finally, planning permission was granted on 2 March 2009 for the installation of gas engines on the site. The gas engines utilise landfill gas to generate electricity and also form part of the on-site infrastructure for managing landfill gas.

3. Community Liaison

- 3.1 The Hafod Liaison Group is well established and is over twenty years old. The group has been chaired by a local councilor. The group's attendees include:

The Site operator now Enovert
 Natural Resources Wales
 Local Members for Johnstown and Ruabon
 Rubaon Community Council
 Johnston Community Council
 Four local residents
 Wrexham Council Mineral's Planning & Public Protection Officers

- 3.2 The Group's purpose is to provide a forum for open and constructive dialogue between the Landfill operator and the local community. Ensuring that information regarding landfill operations, future plans and environmental performance is shared with the aim to build trust between the landfill operator and its neighbours.
- 3.3 The frequency of meetings for the above group was increased from 2 per year to 4 per year following the increase in odour complaints and concerns from the community.
- 3.4 It is good practice to establish Liaison Group's for sites such as landfills, and other sites within Wrexham County Borough also benefit from liaison groups to ensure continued dialogue between operators and the community.
- 3.5 Natural Resources Wales Citizen Page provides a dedicated space to collate all ongoing efforts to address the community's concern.

4. Wrexham Council's Homes and Environment Scrutiny Committee

- 4.1 Wrexham Council's Homes and Environment Scrutiny Committee role is to ensure that we are an environmentally responsible County Borough.
- 4.2 The Homes and Environment Scrutiny Committee agreed a topic selection form in respect of the Hafod Landfill site that was submitted to their June 2024 meeting. It was agreed that a report be considered regarding the site's compliance with the Environmental Permitting (England and Wales) Regulations 2016. A report was prepared for the meeting on the 14th October 2024, which included:
- Progress on mitigation interventions being taken at the Hafod Landfill Site to prevent continued public complaints as a result of activities being undertaken;
 - Consideration of National Resources Wales Enforcement Actions; and
 - Consideration of separate formal options available to the Council within statutory powers.
- 4.3 In line with the recommendations of the Committee at the June and July meetings, representatives of NRW, Enovert, WCBC Public Protection, Public Health Wales and Flintshire County Council have been invited to attend this meeting.
- 4.4 The full report and webcast of the meeting is available to view on Wrexham Council's website (www.wrexham.gov.uk), with weblink below (<https://moderngov.wrexham.gov.uk/ieListDocuments.aspx?CId=173&MID=9596&LLL=0#AI18860>)

The key recommendations:

- That an update report on the issues raised be submitted to this Scrutiny Committee within the next six months detailing the following –
 - The level of complaints;
 - Further information in respect of the monitoring of the air quality on site and the impact of carbon on site;
 - The air monitoring equipment data for on and off the site;
 - That all parties co-operate and work with each other; and
 - That Public Protection Officers endeavour to attend the Hafod Landfill Site Liaison Meetings on a quarterly basis.

4.5 The Homes and Environment Scrutiny met again on the 29th April 2025 to consider progress regarding enforcement, liaison and monitoring action at Hafod Landfill Site.

The full report and webcast of the meeting is available to view on Wrexham Council's website (www.wrexham.gov.uk) with the weblink below:

<https://moderngov.wrexham.gov.uk/ieListDocuments.aspx?CId=173&MID=9602&LLL=0#AI19826>

The key recommendations:

- That the report be noted and that the Committee support the ongoing work to reduce odour from the site and its impact on public health;
 - That a further update report be considered in 6 months;
 - That this report also contain details of any toxicity and any resultant impacts on the health of nearby residents;
 - That the Council explore the expansion of the monitoring stations in the surrounding community;
 - That if the monitoring data continues to show odours being above the accepted limits, the Council explores under its powers via the Environmental Protection Act to tackle any statutory nuisance caused by odours emitted by the site.
- 4.6 The scrutiny process has also availed an opportunity for the community to view progress on the work undertaken. It has provided a transparent opportunity for the public to assess the actions of the Council, Natural Resources Wales, Enovert Ltd and Public Health Wales.

5. Notice of Motion

5.1 A Notice of Motion was submitted to the Council for consideration on the 19th February 2025 by seven members. The report and discussion can be viewed on the Council's website (www.wrexham.gov.uk) and via the below weblink:

<https://moderngov.wrexham.gov.uk/ieListDocuments.aspx?CId=128&MId=9475&LLL=0>

The Council Motion is attached as Appendix A.

5.2 This Motion outlines a plan to support Natural Resources Wales to properly regulate and monitor the operations in line with the Environmental Permitting (England and Wales) Regulations 2016. This supports the recommendations of the Homes & Environment Scrutiny Committee held on 16th October 2024.

5.3 This Council resolved to undertake dedicated actions to support the Motion. A Hafod Landfill Stakeholder Group has since been established, to include WCBC local members, Lead Member for Planning & Public Protection, WCBC Officers, representative of Ruabon, Rhos Community Council, Natural Resources Wales, Constituency Member of the Senedd – Clwyd 5.4 South, Member of Parliament for Montgomeryshire & Glyndwr and representatives of Enovert. The Group have taken forward the actions committed to in the motion and will adjust strategies as needed based on ongoing assessments and community feedback. The group has met twice and the contents of this report outline the work undertaken thus far.

6. Regulatory Responsibility

- 6.1 Hafod Landfill site is permitted and regulated by Natural Resources Wales (NRW) for the landfilling of a wide range of domestic and commercial waste under the Environmental Permitting (England & Wales) Regulations 2016 (EPR). These regulations provide a regulatory regime for activities that have different types of industrial emissions generally to air, water or land. The Local Authority has a role for regulating smaller industrial activities with atmospheric emissions and then Natural Resources Wales regulate the larger industries including landfill sites.
- 6.2 The Chief Officer of Economy and Planning has delegated powers of enforcement to Public Protection Officers to enforce the provisions Environmental Protection Act 1990, and a wide range of Environmental Health based legislation. In addition, the planning permission for the site, includes a list of planning related conditions.

Enforcement Policy

- 6.3 The Council approach to enforcing Environmental legislation is outlined in the Council's enforcement policy. The policy outlines how good enforcement principles are embedded in practice. Our key regulatory aims include achieving less pollution from industrial sites and we will adopt a positive, proactive and balanced approach to ensure compliance.

The Council's Enforcement Policy is available to view via:

<https://www.wrexham.gov.uk/service/public-protection-service-enforcement-policy>.

- 6.4 During the period of elevated odour emissions and complaints (October 2024 to February 2025), Enover was subject to formal action, brought by NRW, requiring a large amount of physical and operational improvements.
- 6.5 Additionally, the policy states that: *'On occasion, it will be more appropriate for other agencies or other local authorities to deal with particular breaches of legislation. In carrying out shared duties, we will still comply with our Enforcement Policy, but the other agencies will maintain the right to take any action they consider necessary'*. As such, the policy dictates that the organisation with primacy (NRW) is the most appropriate to implement formal actions.
- 6.6 The Council's Public Protection Team considered that the only available formal action would have been to serve a section 80 Abatement Notice (should in-person monitoring have indicated there was a statutory nuisance occurring). The conditions required by such a Notice would have essentially mirrored the requirements imposed by NRW.
- 6.7 The regulatory landscape was considered by the Homes and Environment Scrutiny Committee in October 2024. The Council has reviewed its relevant enforcement powers and is committed to ensure that the local community are protected from nuisance odours.

Environmental Permitting & Statutory Nuisance

- 6.8 Due to the type of activities carried out by many regulated activities, such as those undertaken on the landfill sites, there the Local Authority may routinely receive complaints about Statutory Nuisances e.g. odour, dust or noise. However, where the same event might also be prosecuted by the regulator under the Environmental Permitting Regulation, a Local Authority must obtain the Secretary of State's or Welsh Ministers' consent before prosecuting under Part III EPA. Section 79(10) EPA states:

6.9 “A local authority shall not without the consent of the Secretary of State [or, in Wales, Welsh Ministers] institute summary proceedings under this Part in respect of a nuisance falling within paragraph (b), (d), (e), (fb) or (g) ... of subsection (1) above if proceedings in respect thereof might be instituted under ... regulations under section 2 of the Pollution Prevention and Control Act 1999’.

Environmental Protection Act 1990 (Part III) - Local Authority duties

The Local Authority must:

- Inspect their area from time to time, to detect anything that might be a statutory nuisance;
 - Take such steps as are reasonably practicable to investigate any complaint of a statutory nuisance made by a person living within their area; and
 - If satisfied that a statutory nuisance exists or is likely to occur or recur, serve an abatement notice (in accordance with section 80 EPA).
- 6.10 A local authority may then prosecute a person or a company who contravenes or fails to comply with an Abatement Notice without reasonable excuse. The statutory nuisances referred to by section 79(1) EPA refers to “any dust, steam, smell or other effluvia arising on industrial, trade or business premises, so far as they are prejudicial to health or a nuisance”.
- 6.11 For the issue to count as a statutory nuisance, it must unreasonably and substantially interfere with the use or enjoyment of a home or other premises; and / or injure health or be likely to injure health.

Considerations with section 80 of the EPA

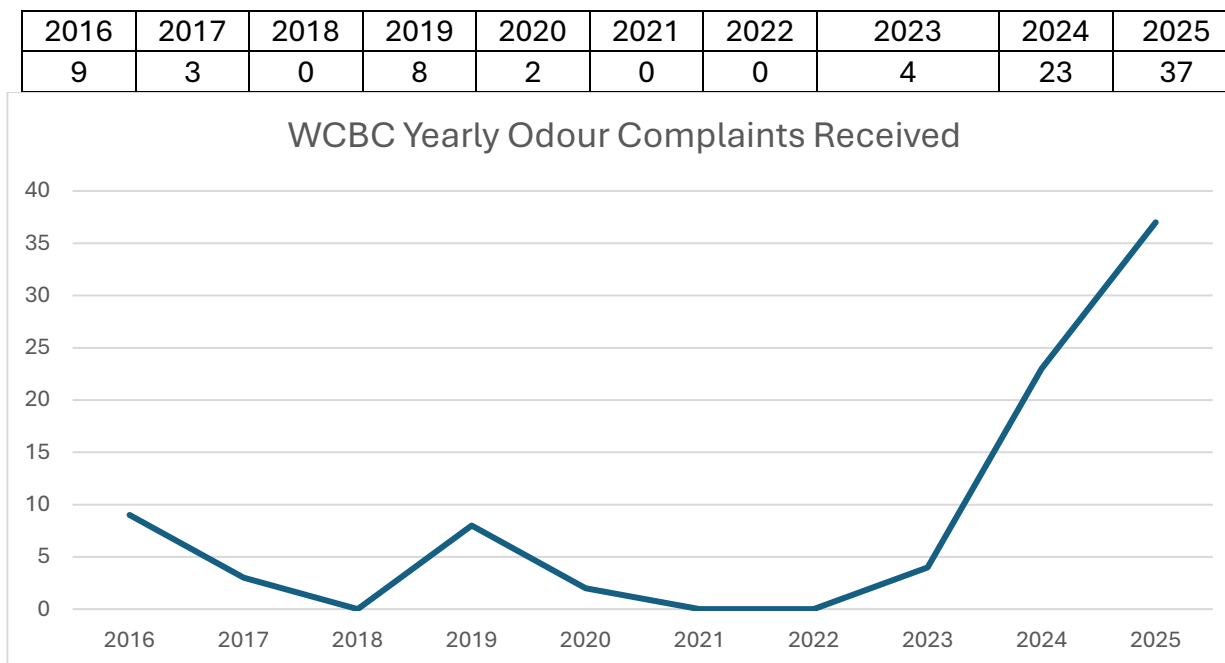
- 6.12 There is no fixed point at which something becomes a statutory nuisance. Councils will rely on suitably qualified Officers (generally an Environmental Health Officer, or EHO) to gather evidence. They may ask the complainant to complete diary sheets but would generally try to make site visits upon receipt of a complaint at the time the alleged nuisance is occurring.
- 6.13 Once the evidence-gathering process is complete, the EHO will assess the evidence. They will consider factors such as the timing, duration, and intensity of the alleged nuisance. The EHO will use their professional judgement to decide whether a statutory nuisance exists. If the EHO is satisfied that a statutory nuisance exists, a Notice can be served that prescribes actions necessary to abate the nuisance. There is no power to cease or prohibit actions, as the power to serve a Notice does not allow for this (unlike EPR).
- 6.14 However, there is a defence known as Best Practicable Means, which is a defence available to commercial activities who are essentially taking all steps to mitigate a problem. Consideration has to be given to the ability of the process operator to do something about the nuisance, as some activities will have inherent impacts that are not possible to eliminate.

Grounds of appeal

- 6.15 A person who receives an Abatement Notice has a right to appeal in the Magistrates’ Court. There are a number of possible routes of appeal if a Notice is served including that there is no nuisance, that the authority is refusing alternative requirements or that the requirements are unnecessary. One could see the latter being used as the company may very well decide to appeal a Notice and highlight that they are already involved in enforcement and actions with NRW.

7. Complaints received by Wrexham County Borough Council

7.1 The table and graph below details odour complaints received from residents to Wrexham County Borough Council's Public Protection Service between 2016 and 20th August 2025;



7.2 Over the last 6 months, there has been a significant decrease in the number of odour complaints received following a peak in the Winter of 2024/25. The decrease in odour has also been noted by and commented on by the most frequent complainant.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2024	1	0	0	0	1	1	0	0	1	7	6	8
2025	31	4	0	0	0	0	1	2				

Detail for whole complaint period

7.3 In summary, the most frequent complainant contacted Public Protection (PP) 14 times, with the next most frequent contacting PP 6 times. [REDACTED]

[REDACTED] The street with the highest number of complaints is Hoel Kenyon, (16 contacts), with the next highest number of complaints from residents on Y Fron (7 contacts)

Hafod Landfill Site – Planning Enforcement

7.4 On 12 March 2025, a complaint was received relating to mud on the road and a potential breach of planning control regarding the requirement for vehicles to pass through wheel wash facilities prior to exiting the site.

7.5 The site was monitored by the Council's Planning Enforcement Officers over a period of 3 months, with a total of 8 site visits taking place over this this period. On no occasion was evidence of mud on the road was observed. The case was therefore closed on 28 May 2025.

8. Environmental Monitoring & Assessment

8.1 Since the initial community related concerns, Officers from Wrexham Council's Public Protection, Natural Resources Wales and Public Health Wales have worked together to address community concerns, meeting on several occasions to review current matters. The primary focus of all parties was to reduce the odour emission from the landfill site, ensuring the best available techniques are employed on site.

Air Quality Monitoring

8.2 It was agreed at the Housing and Economy Scrutiny Committee meeting of 16th October 2024 that an update report on the issues raised at the meeting was to be submitted to the Scrutiny Committee within the six months detailing the following:

- The level of complaints;
- Further information in respect of the monitoring of the air quality on site and the impact of carbon on site; and
- The air monitoring equipment data for on and off the site.

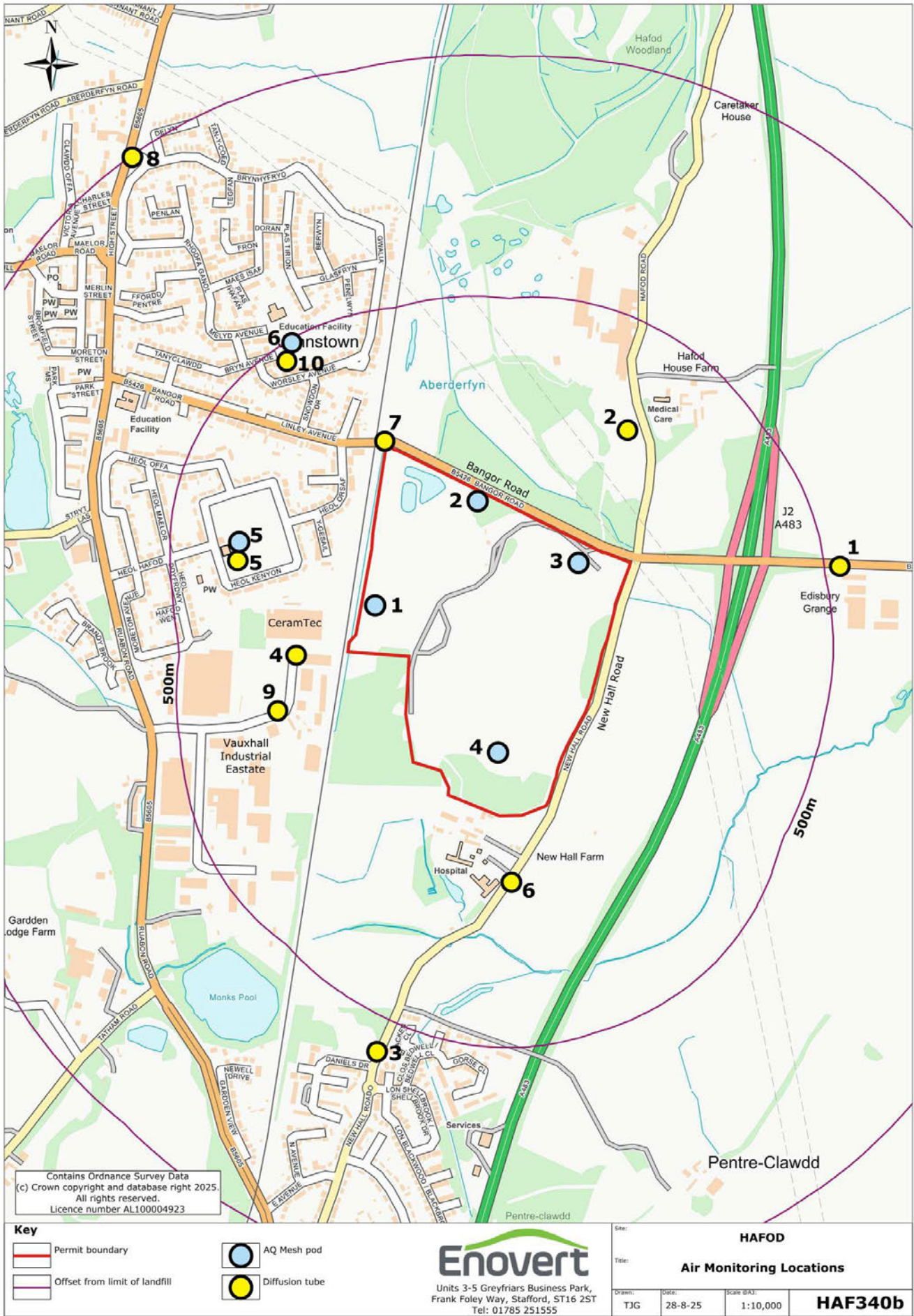
8.3 In response the Council's Public Protection Team undertook an investigation to ascertain the best type of air quality monitoring devices that were capable to detecting hydrogen sulphide (H₂S) and volatile organic compounds (VOCs) at extremely low concentrations, at short intervals (1/10/30 minutes etc.), 24 hours a day monitoring and remote internet access to data.

8.4 Three similar systems were considered, all employing electro-chemical analysers, which means that the Air Quality Monitoring (AQM) pods are both small, lightweight, low powered and can be easily located at sites with or without power. AQM pods designed and manufactured by AQMesh, a UK based company, were chosen and installed during late February and March 2025

8.5 Four AQMesh pods have been installed and operated by Enovert, being sited on the perimeter of the Hafod Landfill site. An additional pod has been installed and operated by Wrexham CBC Public Protection, sited at the Johnstown Community Centre. It is important to stress that the data from AQMesh Pods is qualitative. Quantitative data can only be provided when a stringent QC plan is in place with access to reference instruments. The options to implement this process is being pursued with Enovert and Geotechnology.

8.6 At the request of the local community, an additional pod (including an ultrasonic wind sensor that captures real time wind speed and direction) is to be installed at the Johnstown and Nant Parc Bowling Pavilion (position 6).

8.7 The location of the monitors, shown as blue circles, is shown on the map below. The individual pods measure H₂S in parts per billion (ppb) and also Total Volatile Organic Compounds (TVOCs) again in ppb.



- 8.8 The results from the monitors can be checked in real-time by Public Protection, NRW and Enovert personnel.
- 8.9 An image of the AQMesh pod system (together with the solar power pack and ultrasonic wind sensor) is shown below.



- 8.10 At the suggestion of Enovert's air quality consultants, H₂S diffusion tubes have been co-located with the Wrexham CBC air quality monitoring pods (and a number of other sites surrounding the landfill site) to determine the accuracy of the real time monitors and check for other sources of H₂S. The locations are shown on the Enovert map shown as yellow circles on page 9.
- 8.11 Assessment of all monitoring undertaken by Enovert and the Council is being provided to Geotechnology, consultants employed by Enovert. Reports have been and will continue to be distributed to the Council's EHO, NRW and Enovert and will be accessible to the public via NRW's citizen web pages. The monitoring undertaken in the community will be collated by the Council's EHO with further analysis undertaken with support from PHW and BCUHB. Monitoring results and assessments have been discussed with the Hafod Liaison Group.
- 8.12 Initially the odour threshold guidance standard (4.7ppb – 15 minute average) and Health and Safety Executive EH40 regulatory standards were taken to assess the first results contained in the Homes and Environment Scrutiny Committee report of 29th April 2025. Since this report Public Health Wales have advised that the most appropriate standards to apply to the gathered data should be:

Hydrogen sulphide (H₂S)

Source	Time period	Guideline value	Note
WHO air quality guidelines	30-minute (average)*	7 µg/m ³ (5 ppb)	Based on odour annoyance
	24-hour (average)	150 µg/m ³ (107 ppb)	Based on eye irritation in humans
Acute Exposure Guideline Levels (AEGLs)****	10 minutes	750 ppb	Notable discomfort, irritation, or certain asymptomatic non-sensory effects. However, the effects are not disabling and are transient and reversible upon cessation of exposure.

It is these standards that will be applied to all future and historical data. Other guideline standards are also being considered.

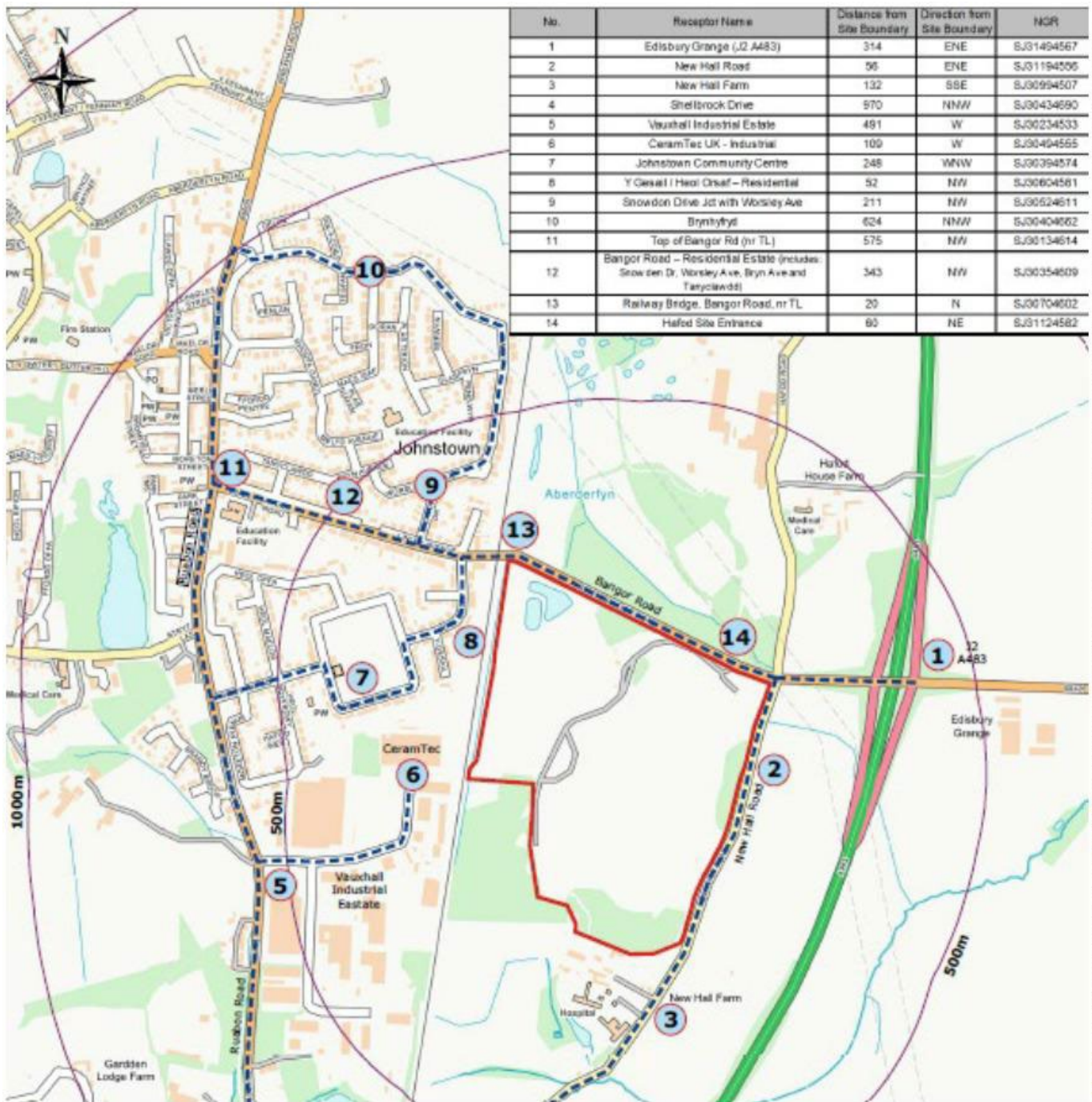
Officer Odour Monitoring 14 July 2025 – 15 August 2025

8.13 In order to assess the current situation in Johnstown, odour monitoring was carried out with regard to landfill odours, by Public Protection Officers at Wrexham CBC, at the below off-site locations:

These locations are:

- 1) Junction 2 - A483 slip road / Edisbury Grange
- 2) New Hall Lane
- 3) New Hall Farm
- 4) Shellbrook Drive
- 5) Vauxhall Industrial Estate
- 6) Ceram Tec UK
- 7) Johnstown Community Centre
- 8) Y Gesail/ Heol Orsaf
- 9) Snowdon jct Worsley
- 10) Brynhyfryd
- 11) Top of Bangor Road
- 12) Bangor Road (Linley Drive, etc)
- 13) Bangor Road Railway Bridge
- 14) Hafod Site Entrance

8.14 These positions are shown on the route highlighted below and an Odour Assessment is made at all 14 locations, with Officer recording their findings. To aid consistency and fair comparison, Officers used the same Odour Intensity Rating Scale as that identified in the AQ report. This is specified on page 13



Rating**Key**

0	No Odour
1	Faint and Intermittent
2	Faint and Continuous
3	Strong and Intermittent
4	Strong and Continuous
5	Very Strong and Intermittent
6	Very Strong and Continuous

8.15 The table below identifies the instances where odour was detected (i.e. 1 and above), dates and times, location and the rating applied using the Odour Intensity Scale

Date	Day	Time	Position	Rating	Location
14/7/25	Monday	10:44	2	4	New Hall Lane
			3	4	New Hall Farm
15/7/25	Tuesday	14:30	2	2	New Hall Lane
			14	4	Site Entrance
16/7/25	Wednesday	11:40	2	4	New Hall Lane
17/7/25	Thursday	16:30	2	3	New Hall Lane
			14	4	Site Entrance
18/7/25	Friday	09:08	14	3	Site Entrance
21/7/25	Monday	11:55	2	2	New Hall Lane
22/7/25	Tuesday	10:50	2	3	New Hall Lane
			3	1	New Hall Farm
			14	1	Site Entrance
23/7/25	Wednesday	13:48	3	4	New Hall Farm
24/7/25	Thursday	09:20	2	3	New Hall Lane
			3	4	New Hall Farm
28/7/25	Monday	14:20	3	4	New Hall Farm
			5	1	Vauxhall Ind Est
			13	1	Railway Bridge
29/7/25	Tuesday	13:30	3	4	New Hall Farm
30/7/25	Wednesday	08:50	2	4	New Hall Lane
			3	6	New Hall Farm
31/7/25	Thursday	14:40	2	4	New Hall Lane
			14	4	Site Entrance
1/8/25	Friday	18:30	1	2	Jct 2 A483
			2	4	New Hall Lane
			3	4	New Hall Farm
5/8/25	Tuesday	14:30	3	4	New Hall Farm
			3	2	New Hall Farm
			5	1	Vauxhall Ind Est
6/8/25	Wednesday	18:00	3	4	New Hall Farm
			14	3	Site Entrance
8/8/25	Friday	10:36	2	4	New Hall Lane
			3	1	New Hall Farm
			14	1	Site Entrance
11/8/25	Monday	10:45	9	1	Snowdon Jct
			13	3	Railway Bridge

Date	Day	Time	Position	Rating	Location
			14	3	Site Entrance
12/8/25	Tuesday	14:30	8	3	Y Gesail/ Heol Orsaf
			9	1	Snowdon Jct
			13	2	Railway Bridge
13/8/25	Wednesday	10:15	12	1	Bangor Road (Linley Dr)
			13	2	Railway Bridge
14/8/25	Thursday	11:00	2	3	New Hall Lane
			3	3	New Hall Farm
15/8/25	Friday	09:20	3	2	New Hall Farm

The points below summarise our findings:

- i. The assessments were carried out Monday-Friday each week from 14 July 2025 ending on 15 August 2025, totalling five weeks.
 - ii. 60% of the checks were carried out in the mornings and 40% in the afternoons but this did not seem to have any impact on the levels of odour detected.
 - iii. The wind direction for almost all of the days recorded, included westerly elements to some degree, NW, W and SW. There was only one occasion where the wind was recorded as having any level of easterly element, on 11/8.
 - iv. There were nine different locations where odour was recorded at some point within that five week period of checks. These locations are 1, 2, 3, 5, 8, 9, 12, 13 and 14 as shown on the previous list.
 - v. Our assessments have determined that over the period 14/7 to 15/8 the locations majorly impacted were 2 (New Hall Lane), 3 (New Hall Farm) and 14 (Site Entrance)
 - vi. Out of the 25 day period, 3 records are not available.
 - vii. Out of the remaining 22 records there was some level of landfill odour recorded each day. The locations 2 & 3 at New Hall Lane and New Hall Farm both recorded odour on over 50% of the days assessed. 55% at location 3 and around 60% at location 2.
- 8.16 The odour checks for Hafod Landfill, carried out by Officers from the Council, have found that levels on New Hall Lane and New Hall Farm are still recording as strong smelling with a mixture of intermittent and continuous landfill odour present. Additionally, there have been many occasions where the odour at the entrance to the Landfill site has also been recorded as strong smelling (a mix of both intermittent and continuous).

Location	Number of occasions odour recorded	Number of occasions odour NOT recorded	Odour level recorded
1	1	21	2
2	13	9	3-4
3	12	10	3-4
4	0	22	0
5	2	20	1
6	0	22	0
7	0	22	0
8	1	21	3
9	2	20	1
10	0	22	0
11	0	22	0
12	1	21	1
13	4	18	2
14	9	13	3-4

- 8.17 During the monitoring period of 22 days, all 14 locations were monitored giving a total of 308 occasions when monitoring points were assessed. On 263 monitoring occasions, NO odour was detected.
- 8.18 The Officer odour monitoring results indicate that no statutory odour nuisance currently exists, relating to the Hafod landfill site at the current time due to infrequency, odour level, area where the odour was detected. The monitoring outcome reflects the current low numbers in community odour complaints, which is welcomed.
- 8.19 Public Protection Officers will continue to carry out Odour Intensity Assessments over the coming weeks to try and ascertain any difference in levels to include more easterly wind. However, this is obviously weather dependent.
- 8.20 Officers will continue to assess alleged odour nuisance where complaint information allows. This cannot be undertaken where complaint is of a historical nature and there is no odour at time of the visit. The likelihood that a complaint could have been at a level considered to be a statutory nuisance can also be checked with reference to the data provided by the AQ monitors.

9. Conclusion

- 9.1 The effective and efficient running of the Hafod Quarry as a landfill site is essential to protect public health, preserve the environment, and enhance the quality of life for local residents. The Council has committed to a responsible and transparent monitoring process.
- 9.2 Failure to meet any necessary actions to safeguard and protect the health of residents and the local environment will result in the necessary plans being drawn up for the closure and effective restoration of the Hafod site to ensure environmental safety and community well-being.

END

Appendix A

Council Motion

We the undersigned submit this Motion to Full Council for debate and consideration:

Councillor David A Bithell, Councillor Steve (Joe) Jones, Councillor Paul Pemberton, Councillor John Phillips, Councillor Mark Pritchard, Councillor Fred Roberts, Councillor Alison Tynan

Notice of Motion:

Introduction: The Hafod Quarry, currently operated by Enovert as a landfill site, has raised significant environmental and public health concerns among local residents and stakeholders. The continued operation of the landfill poses risks such as groundwater contamination, air pollution, and negative impacts on biodiversity.

This motion outlines a plan to support Natural Resources Wales to properly regulate and monitor the operations in line with the Environmental Permitting (England and Wales) Regulations 2016 which supports the recommendations of the Homes & Environment Scrutiny Committee held on 16th October 2024.

This Council resolves to take the following actions:

1. **Conduct a Community Concerns Assessment:**
 - Commission a community concerns assessment, which will capture health, ecological and environment as a whole and put the community first (following advice from Public Health Wales and BCUHB).
 - To ensure that local residents are included in a participatory stakeholder workshop as part of the assessment to gather all health related concerns.
2. **Review and demand on-going robust evidence of appropriate performance environmental monitoring and emissions regulation:**
 - Review and examine the evidence of all monitoring undertaken at the site to ensure it is in line with Environmental Permitting (England and Wales) Regulations 2016.
 - Review the evidence of actions taken following the recommendations of the Homes & Environment Scrutiny Committee held on 16th October 2024.
 - Assess the impact of the landfill on the local environment, air quality and local biodiversity.
 - Statutory Nuisance – Under the Environmental Protection Act 1990 Local Authorities (under Part III EPA) have a duty to ensure all legislative framework is followed.
3. **Full examination of potential Waste Management & Alternatives:**
 - Identify and establish alternative waste management solutions to reduce dependency on landfill disposal for local businesses.
 - Promote waste reduction, recycling, and composting initiatives within the business community.
 - Establish composition of waste analysis at Hafod Quarry Landfill Site.
4. **Full and Effective Community Engagement and Communication:**
 - Ensure transparent communication with the local community about the processes, timelines, and potential impacts, including regular updates on progress.

5. **Review and Report Progress:**

- Provide regular updates to the Homes & Environment Scrutiny Committee on the progress of measures included in this motion and the monitoring and activities.
- To establish a Hafod Landfill Stakeholder Group, to include WCBC local members, Lead Member for Planning & Public Protection, WCBC Officers, representative of Ruabon, Rhos Community Council, Natural Resources Wales, Constituency Member of the Senedd – Clwyd South, Member of Parliament for Montgomeryshire & Glyndwr and representatives of Enovert. The group can take forward the actions committed to in this motion and can adjust strategies as needed based on ongoing assessments and community feedback.

Conclusion: The effective and efficient running of the Hafod Quarry as a landfill site is essential to protect public health, preserve the environment, and enhance the quality of life for local residents. This Council commits to a responsible and transparent review process and any repeated failure of performance, call for all necessary actions to safeguard and protect the health of residents and the local environment.

Resolution: The Full Council adopts this Motion and instructs the relevant departments to initiate and work closely with NRW and partners to ensure the effective operation of the site. Failure to address this should result in the necessary plans being drawn up for the closure and effective restoration of the Hafod site to ensure environmental safety and community well-being.

The Petitions Committee
Welsh Government

Your Ref/Eich Cyf
Our Ref/Ein Cyf
Date/Dyddiad
Ask for/Gofynner am
[REDACTED]
[REDACTED]

DAB
20 August 2025
Councillor David A Bithell
[REDACTED]
[REDACTED]

Dear Chair and Members of the Petitions Committee

We are writing to you as Local Members in relation to the ongoing concerns raised by residents living near Hafod Quarry. The issue of odour from the site has been a persistent source of complaints and distress within our communities, and we wish to set out the current position from a local perspective.

Residents have long reported unacceptable odour levels, which have a direct impact on quality of life and public confidence in how the site is regulated. In December 2023, the site operator was issued with an Enforcement Notice for permit breaches which are recorded on the public register. Following the submission of a topic request on this matter in October 2024, Hafod Quarry was considered by the Council's Scrutiny Committee. Subsequently, in February 2025, a motion was submitted and passed at Full Council (copy attached) which called for stronger action, including:

- Improved and more transparent links to the established Liaison Committee.
- The creation of a new stakeholder group to strengthen accountability and ensure residents' voices are heard.
- Installing monitoring equipment and to carry out a health assessment.

Since then we have seen some progress. Complaints have reduced during 2025, with the operator working more proactively alongside key stakeholders. New monitoring equipment has also been installed, which has the potential to reassure the public that issues are being properly measured and addressed.

However, there is still a great deal of work to do. Better communication with residents is essential if we are to rebuild trust and demonstrate that action is being taken when problems arise. Residents need confidence that the systems in place and public bodies are effective and that their concerns are treated seriously.

As Local Members we remain fully committed to supporting measures which will reduce odour, provide public health assurance, minimise complaints, and ensure accountability. While there are signs of improvement, the situation remains fragile and ongoing support and oversight are essential.

We would, therefore, urge the Petitions Committee to note the progress made, but also to continue pressing for further action to ensure residents feel properly protected and engaged in the progress about Hafod Quarry.

Yours sincerely



Councillor David A Bithell
Local Member for
Johnstown and Pant Ward



Councillor Steve Joe Jones
Local Member for
Johnstown and Pant Ward



Councillor Dana Davies
Local Member for
Ruabon Ward

Motion to Council – Hafod Quarry Landfill Site

We the undersigned submit this Motion to Full Council for debate and consideration:

Councillor David A Bithell, Councillor Steve (Joe) Jones, Councillor Paul Pemberton, Councillor John Phillips, Councillor Mark Pritchard, Councillor Fred Roberts, Councillor Alison Tynan

Notice of Motion:

Introduction: The Hafod Quarry, currently operating by Enovert as a landfill site, has raised significant environmental and public health concerns among local residents and stakeholders. The continued operation of the landfill poses risks such as groundwater contamination, air pollution, and negative impacts on biodiversity. This motion outlines a plan to support Natural Resources Wales to properly regulate and monitor the operations in line with the Environmental Permitting (England and Wales) Regulations 2016 which supports the recommendations of the Homes & Environment Scrutiny Committee held on 16th October 2024.

This Council resolves to take the following actions:

1. **Conduct a Community Concerns Assessment:**
 - Commission a community concerns assessment, which will capture health, ecological and environment as a whole and put the community first (following advice from Public Health Wales and BCUHB).
 - To ensure that local residents are included in a participatory stakeholder workshop as part of the assessment to gather all health related concerns.

2. **Review and demand on-going robust evidence of appropriate performance environmental monitoring and emissions regulation:**
 - Review and examine the evidence of all monitoring undertaken at the site to ensure it is in line with Environmental Permitting (England and Wales) Regulations 2016.
 - Review the evidence of actions taken following the recommendations of the Homes & Environment Scrutiny Committee held on 16th October 2024.
 - Assess the impact of the landfill on the local environment, air quality and local biodiversity.
 - Statutory Nuisance – Under the Environmental Protection Act 1990 Local Authorities (under Part III EPA) have a duty to ensure all legislative framework is followed.

3. **Full examination of potential Waste Management & Alternatives:**
 - Identify and establish alternative waste management solutions to reduce dependency on landfill disposal for local businesses.
 - Promote waste reduction, recycling, and composting initiatives within the business community.
 - Establish composition of waste analysis at Hafod Quarry Landfill Site.

4. **Full and Effective Community Engagement and Communication:**
 - Ensure transparent communication with the local community about the processes, timelines, and potential impacts, including regular updates on progress.

5. **Review and Report Progress:**
 - Provide regular updates to the Homes & Environment Scrutiny Committee on the progress of measures included in this motion and the monitoring and activities.
 - To establish a Hafod Landfill Stakeholder Group, to include WCBC local members, Lead Member for Planning & Public Protection, WCBC Officers, representative of Ruabon, Rhos Community Council, Natural Resources Wales, Constituency Member of the Senedd – Clwyd South, Member of Parliament for Montgomeryshire & Glyndwr and representatives of Enover. The group can take forward the actions committed to in this motion and can adjust strategies as needed based on ongoing assessments and community feedback.

Conclusion: The effective and efficient running of the Hafod Quarry as a landfill site is essential to protect public health, preserve the environment, and enhance the quality of life for local residents. This Council commits to a responsible and transparent review process and any repeated failure of performance, call for all necessary actions to safeguard and protect the health of residents and the local environment.

Resolution: The Full Council adopts this Motion and instructs the relevant departments to initiate and work closely with NRW and partners to ensure the effective operation of the site. Failure to address this should result in the necessary plans being drawn up for the closure and effective restoration of the Hafod site to ensure environmental safety and community well-being.

Written Evidence – P-06-1510 Hafod Landfill Site

Written evidence for Members of the Senedd Committee ahead of the meeting on Monday 22 September regarding *P-06-1510 Direct NRW to revoke the environmental permit and ensure the closure of Enover's, Hafod Landfill Site in Wrexham.*

Background

Environmental Permit

Hafod Landfill Site is regulated by Natural Resources Wales under Environmental Permit EPR-PP3139GB.

The permit includes a condition that requires the operator to prevent odour off site or, where that is not possible, to keep it to a minimum. The operator will describe how it will achieve this in a document called an Odour Management Plan (OMP). The OMP must be kept up to date and each revision is assessed by our officers to ensure it covers all the key areas of operations in relation to odour management. Officers assess compliance with the odour condition by:

- Verifying the presence, type and intensity of odour in the vicinity of a permitted site,
- Identifying whether the site is the likely source of the odour, and if proven, going on site to determine the causes of any odours and whether the operator is taking appropriate measures to control the odour.

Odour investigations

Officers carry out odour investigations (including off-site odour assessments) in accordance with our guidance and by reference to published odour management guidance.

Odour intensity describes the strength of the odour as perceived by an individual officer. We record odour intensity using a scale of 0 to 6, where 0 = no odour, 3 = distinct odour and 6 = extremely strong odour. A permit breach will only be recorded where:

- Odour due to activities on the site at a level likely to cause pollution outside the site boundary is substantiated by an officer, and
- The operator is not taking all appropriate measures to control that odour.

If the operator is taking appropriate measures, then no breach of the permit has occurred, even if there is some odour. We would expect the operator to identify appropriate measures in its Odour Management Plan (OMP), but we may require additional measures if serious odour pollution occurs.

The operator is informed about any odour reports we receive that relate to the site, but we do not release personal data, so they cannot identify individual reporters. The operator is

expected to respond to reports of odour in accordance with its OMP for the site, and to advise us of any resulting changes to operations.

It is our role to assess compliance with the permits and to take appropriate regulatory action if we identify any breaches. We do so by reference to our enforcement and prosecutions policy, and with appropriate regard to the Regulators' Code.

Our regulatory team assess compliance with the permit conditions at Hafod Landfill in several ways including site inspection, audit, off-site odour assessments, and review of reports and monitoring data.

We charge all permit-holders subsistence fees, which cover the cost of these routine regulatory activities. Subsistence fees do not cover provision of a constant officer presence on any permitted site.

A Compliance Assessment Report (CAR) is used to record the findings of our site inspections, audits and monitoring activities, reviews of monitoring and other data/reports. We use our guidance on assessing and scoring environmental permit compliance to score permit breaches in accordance with our Compliance Classification Scheme (CCS). The risk category and score we give a non-compliance reflects the potential impact it could have if it were not addressed promptly and adequately. The only exception is for non-compliances relating to amenity conditions - odour, dust, noise and pests. We categorise the risk and score these according to their actual (rather than potential) impact. There are 4 risk categories of non-compliance. Each risk category is scored. The scores are accumulated during the compliance year. Further information about how we score permit breaches, and how this impacts on the sites annual subsistence fees is set out in our guidance on our charging schemes.

Landfill odours

Landfill operations will always have periodic odours but this should not be a sustained event. There are two main sources of odours at a landfill site:

- The waste as it is deposited can produce an odour like a household dustbin.
- Gases produced by the degradation of the waste over time.

When waste is disposed of at the site it is done in phases (known as cells). Once a cell is full of waste it is capped off (sealed) with an impermeable covering. This prevents rainwater getting into the cell and aids the collection of the landfill gas which is produced when the waste starts to break down.

Landfill gas typically contains methane (approximately 65%) and carbon dioxide (35%) which are not odorous gases. There will typically be a range of other compounds at relatively low concentrations within the landfill gas known as trace gases. These trace gases can contain substances which cause landfill gas to be odorous, such as hydrogen sulphide (H₂S). Hydrogen Sulphide is a trace gas that can cause the 'rotten eggs' smell, it can be smelt at much lower concentrations than the levels that can cause harm. Any gases will

have undergone significant dilution by the time they are smelt within the local proximity, and it is very unlikely to impact human health.

Landfill gas odours can be the result of several factors: some of these may be a result of management failures, others are the result of planned and necessary works such as the installation of new gas extraction infrastructure.

Odours are the result of complex interactions within the site. Whether they can be smelt off-site, and where they will be smelt, is often a result of local weather conditions. If you notice the smell one day but not the next this could be because of a change in temperature, wind speed or direction or a change in atmospheric pressure. For example, gasses will always move toward an area of lower pressure, as a result we are more likely to experience odours when the atmospheric pressure is low or falling. Similarly, on colder or still days the odours are not dispersed as quickly which means we are more likely to experience odours.

NRW have been fortunate to work closely with other UK Environment Agencies to share an odour training pathway, developed to provide training for staff who permit and regulate industrial sites. The pathway has four sequential levels and will take a candidate from a basic knowledge of odour to competent and then onto local expert. The first three levels are online packages and the final stage is a face to face session delivered by the Environment Agency. We are allocated a small number of places for the face to face sessions, so we target our resources based on the need in specific operational areas of Wales and the availability of our staff.

To supplement this training pathway, we also undertake face to face sniff testing. The sessions give regulatory officers an indication of how their sensitivity to odour compares to the general population. It must be stressed that the purpose of these sessions is not to “train” or “calibrate” officers’ noses. Instead, the objective is to raise awareness of the wide range of normal odour sensitivity found across the population and to assess where our officers’ odour sensitivity falls within this range.

Landfill Closure

There are two ways that a landfill can be formally closed under the Environmental Permitting (England and Wales) Regulations 2016 and the Landfill Directive:

1. Operator-initiated closure - When the operator of an operational landfill permanently stops accepting waste, it can start the closure procedure. It must be compliant with the permit and have appropriate infrastructure, operating techniques, and management plans in place to manage the site through the aftercare phase.
2. Regulator-initiated closure - When Natural Resources Wales decides that a site must close and issues a Closure Notice. This will normally be when the management of an operational site is poor and further operation of the site may result in significant, long-term pollution.

A Closure Notice is normally used as a last resort once other enforcement options have been exhausted. Under a Closure Notice, the operator must still comply with its permit conditions and remains responsible for maintaining active pollution control measures.

Regulatory History

All Compliance Assessment undertaken under the Environmental Permit can be viewed on our [Public Register](#).

The graph in Figure 1 below shows the monthly total of odour incident reports reported to Environment Agency Wales / Natural Resources Wales between 2007 and 2025.

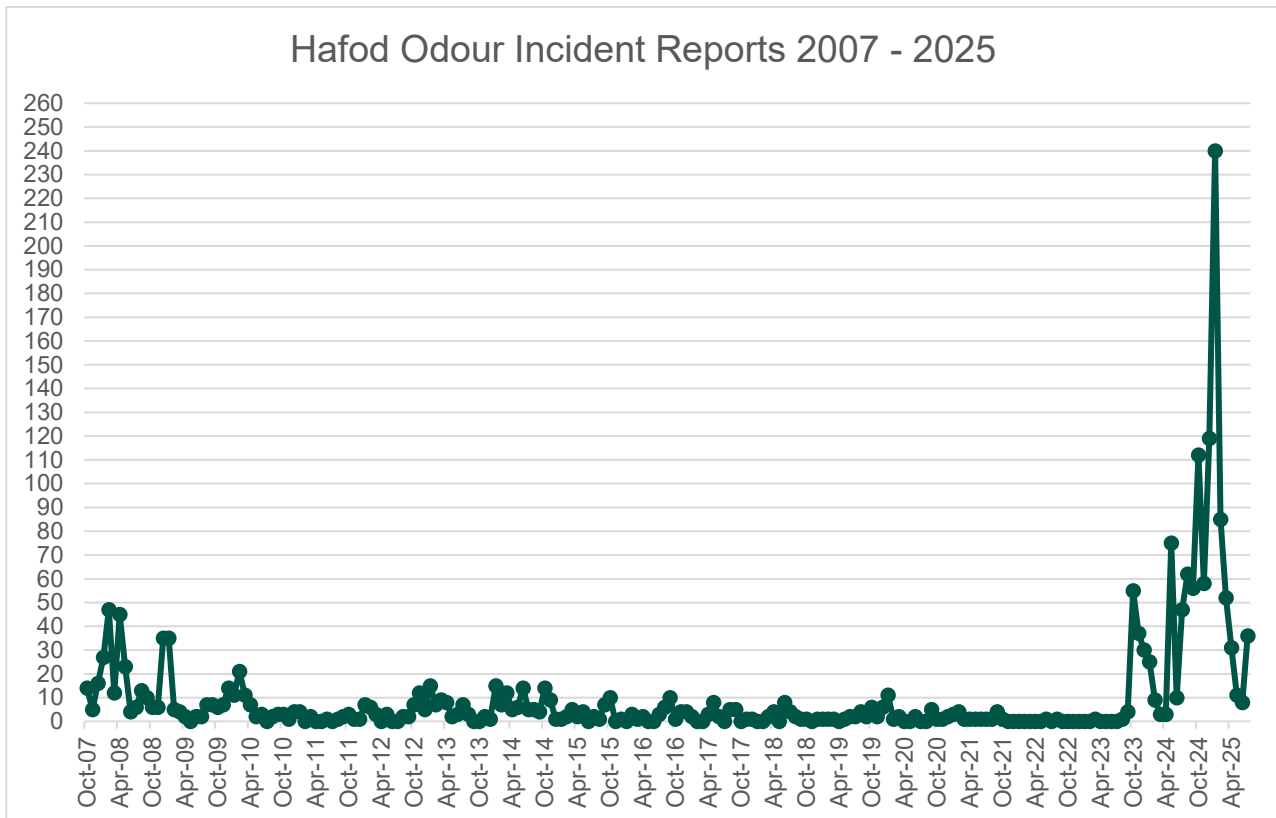


Figure 1: Odour incident report numbers – Hafod Landfill

The graph shows that odour incident reports have varied over time, but report numbers were particularly low between January 2020 and September 2023.

In October 2023, we received a spike in odour incident reports, up from 4 in September 2023 to 55. Our Officers have attended a number of incidents and substantiated an offsite landfill gas odour. Following a site inspection, the operator provided us with an Action Plan to address the odour reports. We then issued a Regulation 36 Notice to the operator on the 21st of December 2023 with a number of actions required to address the odour reports. The deadline for these actions was midday on the 31st of January 2024.

Our officers visited the site on the 31st of January 2024 and were satisfied that all steps of the Notice had been complied with and the operator had implemented appropriate measures to reduce the potential for fugitive gas emissions and odour.

Our officers completed a follow-up audit on the 8th of March 2024, and some localised gas emissions were identified. To address these emissions, the Operator proposed a further

series of remedial measures. Our officers visited the site on the 13th of May to assess progress with the remedial measures. Some transient landfill gas odours were detected but overall, there seemed to be an improvement since the last inspection. We continued to closely monitor the landfill over the summer months.

In November 2024, our specialist Landfill Emissions Reduction Project (LERP) team carried out a landfill gas audit at Hafod Landfill. Following the audit a number of recommendations were given to the operator and actions required in a CAR. The main actions focussed on increased temporary capping, provision of additional gas infrastructure-wells & pin-wells, re-sealing some gas/ leachate wells, areas of existing temporary capping, implement measures to reduce emissions around leachate wells/ towers.

There was an escalation in odour incident reports during December 2024 - January 2025. Our officers have confirmed the presence of offsite odour during this period, and we dedicating significant resources to ensure that the site operator complies with the requirements of the LERP audit CAR.

Odour incident reports peak in January 2025, at 240, and we have seen a decreasing trend in complaints since then, as improvement works have been undertaken at the site. Some of these improvements were already planned but our regulatory work has given focus and strict timescales for completion.

The Environmental Permit is clear of our expectations. Compliance scores have been applied where permit breaches have been identified, and enforcement action is considered in line with our policies.

We continue to undertake unannounced inspections and site audits. Some leachate levels are in breach of the Permit requirements and we are considering further enforcement action.

At present the site operator is still working through several actions which we believe are addressing the issues at the site. In the meantime, we will continue to regulate them closely.

Stakeholder Engagement

We have been keen to keep local residents and other stakeholders informed about our regulatory work.

We attend every Hafod liaison meeting, which serves as an important platform for community representation. These meetings will continue to provide opportunities for residents to engage, receive updates, and share their concerns.

To enhance communication, we have launched a Citizen Space page. This page is regularly updated with information about our regulatory work and the actions being taken by the operator to address community concerns.

Please find the relevant links below:

Cymraeg: <https://ymgynggori.cyfoethnaturiol.cymru/north-east-gogledd-ddwyrain/sut-rydym-yn-rheoleiddio-safle-tirlenwi-hafod-wrec>

English: <https://ymgynggori.cyfoethnaturiol.cymru/north-east-gogledd-ddwyrain/how-we-are-regulating-hafod-landfill-wrexham>

Associated with the CS page is the opportunity for residents to sign up to a regular newsletter.

In March 2025, we met with Deputy First Minister Huw Irranca-Davies AS/MS to discuss our regulatory work. The research briefing produced by Senedd Research for the Petitions Committee here:

[Research brief.pdf](#)

In March 2025, we attended the first Hafod Landfill Stakeholder Group. Following the meeting a joint statement was released. Further information here:

[Hafod landfill site update – March 2025 - Wrexham Council News](#)

In April 2025, we attended the Wrexham County Borough Council Homes and Environment Scrutiny Committee meeting to discuss the odour complaints.

The Homes and Environment Scrutiny Committee agreed several recommendations following a meeting held on 16 October 2024 in respect of odour from Hafod Landfill site. It was agreed that an update report on the issues raised at the meeting be submitted to the scrutiny committee within the next six months. The meeting on the 29 April 2025 was to discuss the update report. Further information here:

[\(Public Pack\)Item 5 Agenda Supplement for Homes and Environment Scrutiny Committee, 29/04/2025 10:30](#)

At the meeting, we provided an update on NRW regulatory actions undertaken at Hafod Landfill over the last 6 months. It is encouraging that there has been a decreasing trend in complaints, following regulatory actions, however it is recognised that odours are still being experienced.

We are to continue with pro-active regulatory work to ensure that further improvements are achieved promptly, including enhanced leachate management.

Evidence Submitted by Enovert North Limited

Reference Petition P-06-1510 – Direct NRW to revoke the environmental permit and ensure the closure of Enovert’s, Hafod Landfill Site in Wrexham.

Enovert are grateful to the Senedd Petitions Committee for the opportunity to provide evidence in respect of operations at our Hafod landfill site. We further welcome the opportunity to answer questions at the meeting scheduled for the 22nd September 2025.

Background

Enovert are a leading UK waste and resource operator with facilities, including landfill sites, composting facilities, waste transfer and treatment and renewable electricity generation assets (landfill gas generation and solar) across England and Wales. Our waste management facilities are regulated facilities permitted under the Environmental Permitting Regulations as regulated by The Environment Agency in England and Natural Resources Wales for our Welsh sites.

We are committed to environmental, health and safety and operational excellence. Our operating systems are certified to the following internationally recognised standards as verified by independent accredited auditors:

- ISO 14001 - Environmental Management Systems
- ISO 45001 - Health & Safety Management
- ISO 9000 - Quality Management System
- ISO 50001 - Energy Management

Enovert was formerly a part of the Cory Environmental group, who purchased the Hafod site in 2008. Enovert was formed in 2018 when the Cory landfill and gas generation business was sold, resulting in our acquisition of the Hafod Landfill site. Cory staff transferred to the Enovert business ensuring continuity of operations, retention of historical knowledge and maintenance of links between the business and the local community for the Hafod site and all other of our facilities.

Hafod Landfill Site

The Hafod site is permitted (Permit Number EPR/PP3139GB) as a biodegradable non-hazardous landfill site accepting a range of wastes, which as they decompose under controlled conditions in the landfill site produce byproduct gases (landfill gas) and leachate (a liquid rich in ammonical nitrogen). Landfill gas is collected and utilised as fuel for the generation of renewable electricity and leachate is abstracted and tankered

off-site to a suitable permitted wastewater treatment facility. The site accepts in the order of 120,000 tonnes of waste each year, a proportion of which are soils used in the final restoration of the site. We have provided a summary of the waste arising detail further on.

Odour Complaint Data

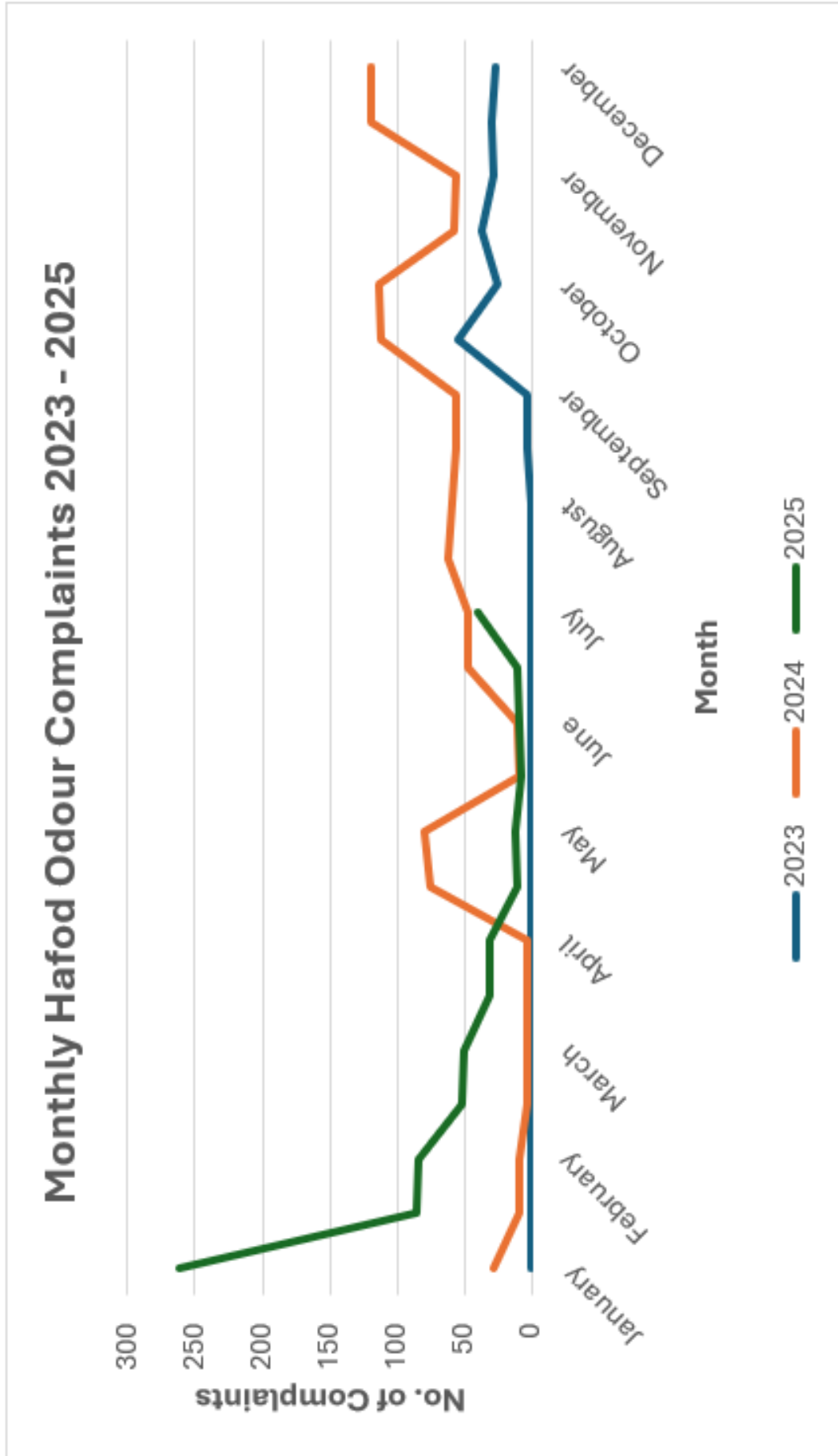
Enovert takes all complaints seriously investigating each one and reacting accordingly to control our operations and infrastructure to minimise the risk of odours arising. It is always our intention to be a good, responsible neighbour.

On the 16th November 2023 the site received a number of odour complaints whereas prior to this time complaints were almost non-existent. Enovert took immediate action bringing forward capping and gas well installation works scheduled for completion prior to year end. These works we completed in November 2023 as part of an action plan submitted to NRW and community updates were provided advising on progress throughout.

Despite Enovert's actions taken to address odour complaints and in response to the level of complaint on 21st December 2023 NRW issued a Statutory Notice. The Notice required Enovert to undertake a series of works and monitoring exercises, many of which had already been included in the action plan previously submitted by Enovert and some having been completed prior to issue of the Notice itself. Enovert responded to the Notice immediately, agreeing to undertake all actions NRW felt necessary. We complied with the Notice completing actions to agreed timescales.

The chart below summarises the volume of odour complaints received by NRW during the period October 2023 to July 2024, inclusive. In summary:

- 2023 had consistently low complaint levels, up until October 2023.
- 2024 showed a mid-year rise and sustained high levels in autumn and winter – peaking at 110 complaints in the October.
- 2025 so far shows an unusually high spike in January (peak of 270), but then a steep fall, settling at much lower levels currently.



Works on Site

Enovert have undertaken a programme of works at the Hafod site since complaints began in 2023. The programme of works is summarised below showing our commitment to continuous improvement, investment at the site and use of all appropriate measures to control landfill gas and ensure the site operates responsibly.

Item	Description	Date Completed
1	Installation of 6 new deep gas wells	Oct-23
2	Extension of 180mm gas main and new flow lines	Nov-23
3	Installation of 5000m ² of permanent clay capping	Nov-23
4	Temporary clay capping of outer northern flank of Cell 5a. NB: LLDPE placed in when weather better	Dec-23
5	Temporary clay capping and LLDPE capping of top of Cell 5a - 5500m ²	Jan-24
6	Temporary clay capping of western flank of Cell 5a. NB LLDPE placed in Jun-24 when weather better	Jan-24
7	Installation of 250mm gas main to Cell 5b	Jan-24
8	Fit pneumatic pumps to gas wells in Cell 5a	Feb-24
9	Installation of 2 x horizontal leachate drains and 2 x pin wells on Cell 5a and connect to gas system	Dec-23
10	Installation of new 180mm gas main on internal bench in Cell 5a and reroute gas collection pipes	Mar-24
11	New leachate main installed from Cell 5b to green tanks	Jan-24
12	Installation of 10 new pin wells on western flank of Cell 5a	Feb-24
13	Installation of new 250mm gas main to allow future gas extraction in Cell 5b	Jun-24
14	Install new horizontal gas collection pipes in Cell 5b to provide extraction on active tipping area	Apr-24
15	Remediate bentonite seals on all leachate chambers	May-24
16	Remediate bentonite seals on all gas wells	Jun-24
17	Install new collector pipes to LC5 and MP5b to improve gas collection	Jun-24
18	Installation of 3000m ² of temporary LLDPE capping on western flank of Cell 5b	Sep-24
19	Extension of 180mm gas main along perimeter of Cell 5c to form a ring main	Dec-24
20	Install further temporary LLDPE capping on northern and western flanks of Cell 5b	Sep-24
21	Install replacement 3516 CAT genset due to failure of Hafod 1	Nov-24
22	Installation of misting system adjacent to Landfill Gas Management Compound	Jan-25
23	Purchase of leachate eductor system to use in gas wells	Feb-25
24	Installation of 7 new deep gas wells and connection into extraction system	Mar-25
25	Installation of 17 new pin wells on outer northern flank of Cell 4	Mar-25
26	Install replacement 3512 CAT genset (engine)	Apr-25
27	Gas manifold moved on Cell 4 to improve gas flows	Apr-25
28	Installation of 2 x horizontal gas collection pipes	Apr-25

29	Installation of 4 x Air Quality Monitoring units within boundary of the site	Apr-25
30	Installation of 6000m2 of temporary LLDPE capping on northern flank of Cell 4	May-25
31	Installation of a further 1000m2 of temporary LLDPE capping on top pf Cell 5a	Jun-25
32	Install replacement 3516 genset (engine)	Jul-25

Engagement and Public Liaison

Through working with Natural Resources Wales, Wrexham Public Protection Department, Local Councillors and the Hafod Community Liaison Group, we have provided updates on all progress on site and attempted to provide sufficient information to address the community's concerns.

Natural Resources Wales (Regulator)

In addition to usual regulatory interactions, we have maintained open channels of communication to keep the regulator informed of ongoing works on site, provide community updates and provide confidence that as operator we are fully engaged in and invested in addressing matters of compliance.

Site Resident Liaison Meetings

These meetings have been held at the site since prior to 2008 and are attended by local area representatives, local elected members, Wrexham Public Health, Wrexham Planning Department, Natural Resources Wales and Senior Enovert Management representatives. The meetings, held quarterly, run to an agreed agenda which includes operational updates and feedback from the community issues and concerns. Details of the meetings are shared with the wider community via the community representatives and elected members. Over the years the resident liaison meetings have been effective in maintaining open lines of communication with the community including during any periods of difficulty or concern regarding the site.

Wrexham - Homes & Environment Scrutiny Committee

Enovert were asked to attend these meeting to provide evidence of our operations and answer questions put forward from the Committee and members of the public. We have fully engaged in the meetings, attending the first meeting in October 2024. The key action of those agreed from that meeting was for Enovert to work with Wrexham Council Public Protection Department to install Hydrogen Sulphide (H2S) monitoring devices to collect data for assessment of the potential for impact on public health. We have devoted considerable resource since then to the installation and routine monitoring of H2S providing four monitoring stations around the site in conjunction with those provided by

Wrexham in the community. Additionally, we have appointed and are working with leading independent environmental consultants to enable the proper technical assessment of the data collected and, on their recommendation, also installed additional diffusion tube monitoring devices to provide accurate detail in respect of actual exposure risk. The initial scrutiny committee meeting also recommended the formation of a stakeholder group to take forward and manage actions and public liaison, and again we have fully engaged in that process.

Wrexham – Hafod Stakeholder Meetings

Enovert attended the inaugural meeting on 21st March 2025 and again on 18th July 2025, and at each meeting presented a detailed report on the Hafod site, including works undertaken and those scheduled, as well as details of progress on H2S monitoring. Invited member to the meetings are:

- Deputy Leader (WCBC)
- Lead Member for Planning and Public Protection (WCBC)
- Local Members for Pant and Johnstown
- Local Member for Ruabon
- Chair of Ruabon Community Council
- Chair of Rhos Community Council
- Representatives of Enovert
- Constituency Member of the Senedd – Clwyd South
- Member of Parliament for Montgomeryshire & Glyndwr

Officer membership shall include;

- Chief Officer Economy & Planning (WCBC)
- Head of Service, Public Protection (WCBC)
- Head of Service, Planning Development Management (WCBC)
- Natural Resource Wales representatives

Members of the Senedd

We have conducted site visits and corresponded with the following elected members of the Senedd:

Ken Skates MS – In April 2024 and following the onset of complaints in November 2023 Ken Skates MS visited the Hafod site and we discussed works to improve gas collection systems.

Steve Witherden MP – Visited the site in October 2024.

Llyr Gruffydd MS – In October 2025 Enovert responded to a request for provision of waste input data and to provide reassurance as to the safety on the site in respect of emissions and we provided the detail requested.

Huw Irranca-Davies MS (Deputy First Minister of Wales) – Visited the site in March 2025 and later writing to encourage Enovert to ensure compliance with the sites Environmental Permit through engagement with NRW, and the importance of engaging with the public regarding any necessary maintenance and infrastructure works at the site – comments we have wholly taken on board and actively pursued.

In addition to the above, during the 12-month period to July 2025 we have responded to and provided over 25 separate press statements regarding works and progress at the Hafod site.

Air Quality Monitoring – Hafod Landfill Site

In conjunction with Wrexham Public Protection Department and as agreed with Wrexham Homes & Environment Scrutiny Committee Enovert are partially funding an air quality monitoring scheme. This includes monitoring for Hydrogen Sulphide gas on site as well as in the community. The aim is to gather quantitative data regarding the concentration of Hydrogen Sulphide in air. At this stage, the monitoring includes passive diffusion tubes that provide averaged concentrations over a defined period and specialist instrumentation (AQ Mesh pods) logging real-time measurements that record average readings every 15 minutes based on readings taken every 10 seconds. Regular daily off-site and on-site odour surveys are also undertaken and complaints recorded and evaluated. The monitoring also logs weather conditions, including wind direction and atmospheric conditions used to consider source, pathway and receptor relationships.

The monitoring exercise needs to gather a sufficient body of data to allow proper assessment of the air quality environment. We are awaiting the data from the instruments for the third monitoring period at the time of writing. We have agreed to

provide the latest monitoring data summary, with the benefit of the third *round of monitoring detail*, to the Senedd Petitions Committee by 15th September for inclusion in our evidence.

The Petition

Enovert acknowledge the strength of feeling expressed in the petition and the community's concerns about the Hafod landfill site. Whilst the petition was directed at securing an independent inquiry into NRW's regulatory performance, and more broadly into the fitness of the regulatory framework under which the Hafod site operates in the interests of transparency and accountability Enovert have provided responses to the petition so far as it refers to our operation of the Hafod site. Our responses run in the same order as the matters are raised in the petition.

1. Hafod Landfill Site has caused community distress for 18 years, making it Wales' longest running environmental campaign.

Whilst the site has a controversial history having been through a planning appeal for the original landfill planning consent and at one time, under alternative ownership, having accepted all of Merseyside's domestic waste for disposal the site does not have a history of significant environmental impact or complaint. Odour complaints increased more recently in October 2023 at which time public and media interest in the site also increased and since which time Enovert have taken all practical measures to control odours at the site.

2. The site continues to emit noxious odours creating an unacceptable statutory nuisance.

Olfactory monitoring (sniff tests) has been undertaken on a regular basis by Enovert and independently by NRW and malodour associated with the landfill site has not regularly been detected in residential areas. The being Air Quality Monitoring being conducted, which includes an instrument and diffusion tube at the Johnstown Community Centre, will help in assessing the levels of Hydrogen Sulphide gas present and combined with weather and atmospheric data sources of emission.

3. NRW are responsible for environmental protection and has failed to take meaningful enforcement action.

Enforcement action by NRW in respect of odour has not been necessary in accordance with conditions of the sites Environmental Permit and the framework under which the Permit is issued. Instances where an NRW regulatory officer has suspected a non-compliance have been raised with Enovert in Compliance Assessment Reports and if appropriate scored in accordance with NRW's guidance. This has included issue of formal Notice in December 2023 as we have outlined above. In accordance with the Permit and regulatory guidance where non-compliances have been raised, Enovert are

obligated to address these via submission of improvement plans which must be adhered to and deliver the agreed improvement and done this. As operator we would suggest the site has been appropriately and proportionately regulated by NRW.

4. If NRW regulatory framework allows a site to emit persistent and overpowering odours whilst remaining compliant, then the regulations are clearly not fit for purpose.

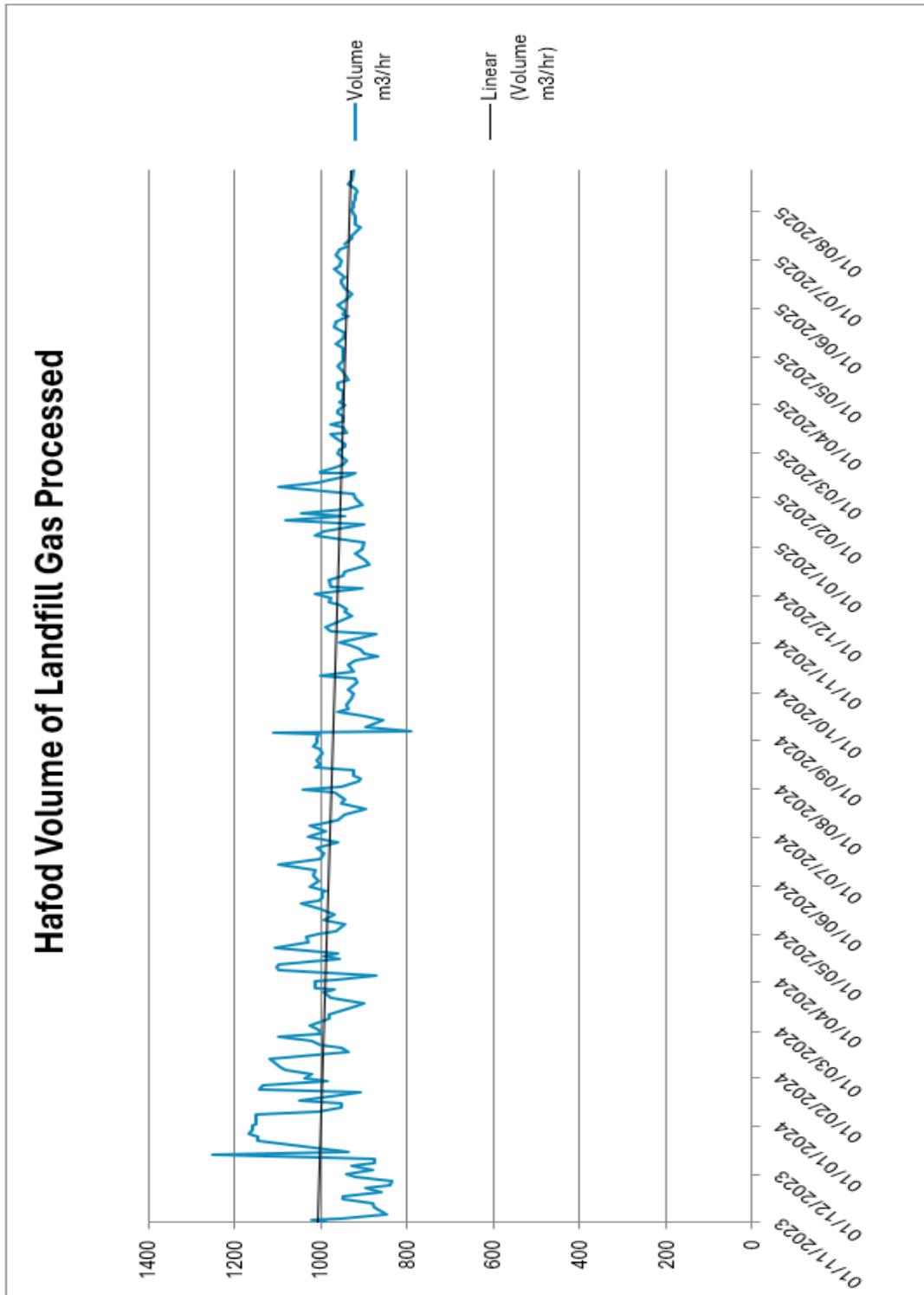
Environmental Permits do not specify emission limits for fugitive emissions, but they do set formal emission limits at designated points. The permit requires that there be no uncontrolled emissions beyond the site boundary during normal operations. Enovert, as the operator, must use appropriate measures to minimise and prevent fugitive emissions, and implement extra controls and notify NRW during exceptional activities like drilling or excavation that may cause odours. Enovert has complied with these requirements.

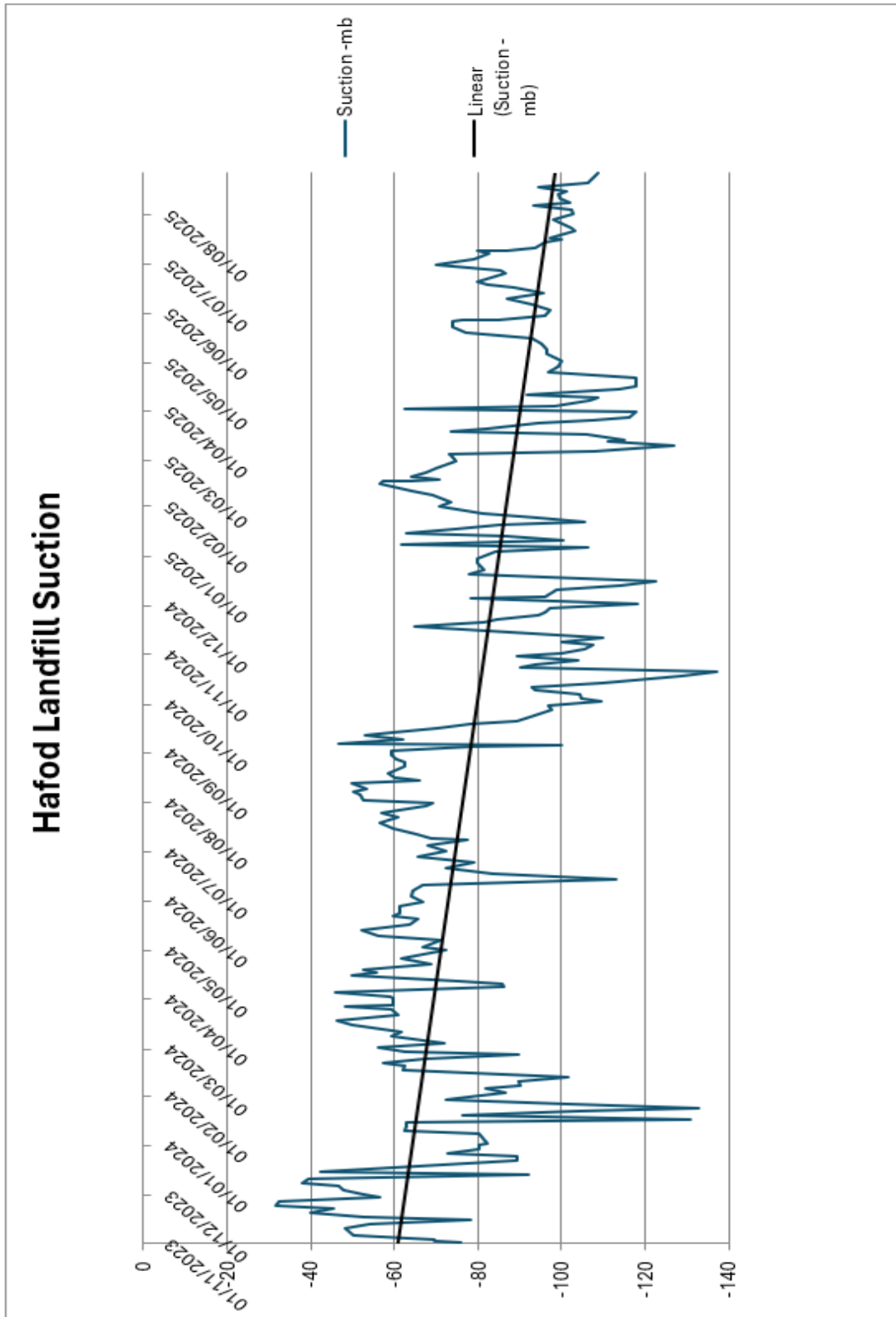
5. Their own (NRW's) last Inspection reported key failings such as a non-operational gas engine, increasing the release of landfill gases.

It is common for gas engines to experience periods of non-operation due to the demanding conditions in which they function. These engines operate continuously and utilise landfill gas as their fuel source to generate renewable electricity. As a result, landfill gas engines are subject to significant wear, necessitating routine servicing at intervals as frequent as every 250–500 hours, depending on engine condition and fuel quality. Unplanned mechanical failures may arise, with the likelihood increasing as the engine ages and experiences general wear.

In response to these operational realities and acknowledging that engine downtime is both expected and essential for repairs and maintenance, the Hafod site deploys two gas engines under normal circumstances. The presence of a secondary engine ensures continued utilisation of landfill gas for electricity production should one engine be offline; any surplus gas previously consumed by the primary engine is automatically diverted to, and managed via, the flare. Similarly, if both engines are simultaneously offline, the gas flare is capable of safely managing the total volume of gas produced by the site at peak capacity. This approach guarantees consistent control over the gasfield, vacuum systems, and gas collection operations. Consequently, having a gas engine offline does not result in elevated risk of fugitive gas emissions.

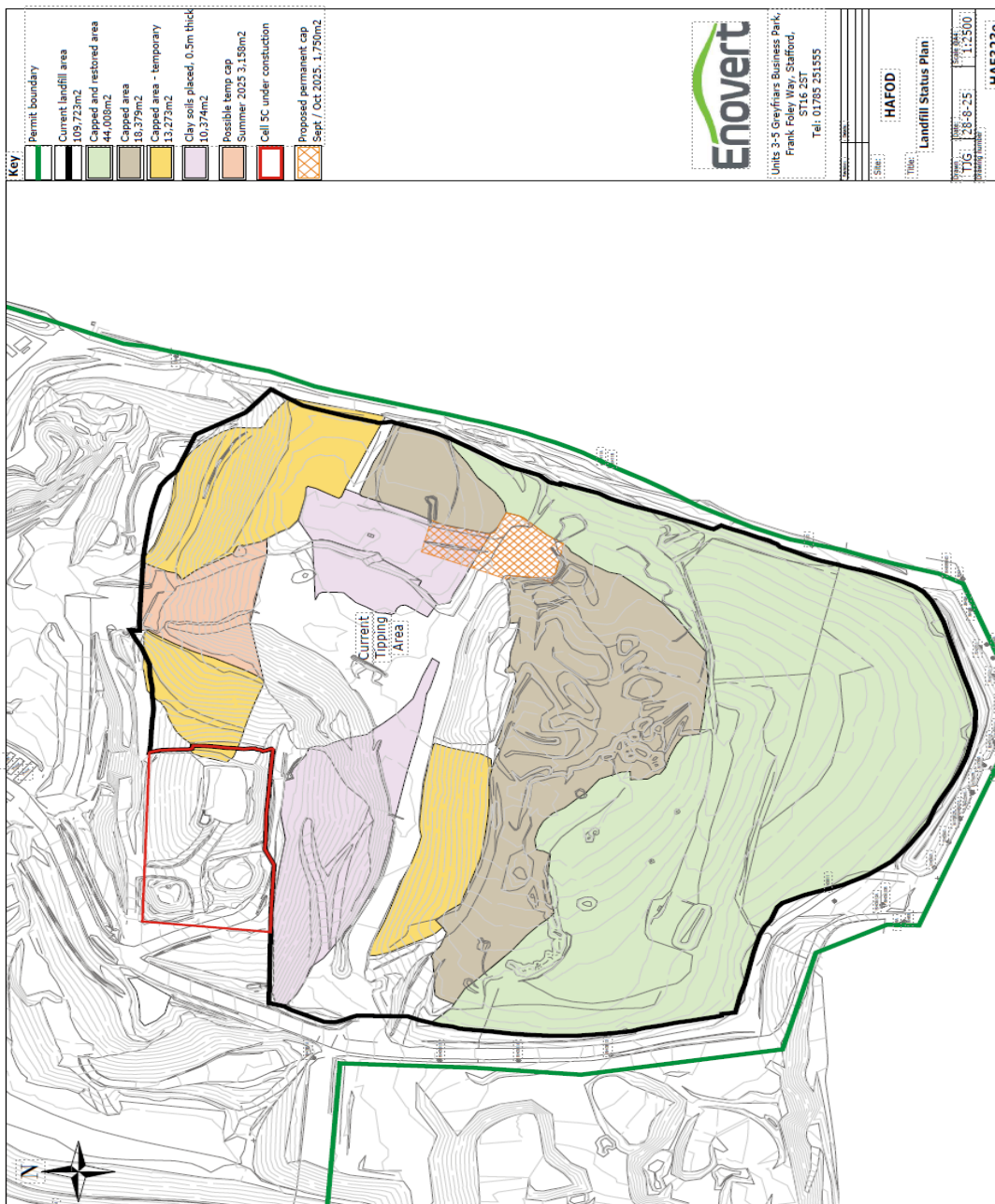
The graphs display landfill gas volumes abstracted from Hafod landfill site between 01/11/23 and 28/08/25. Gas is extracted using a vacuum pump (gas plant), measured in m³/hr with suction in millibars (mb). The gas plant can supply both flare and gas engines simultaneously, maintaining an average gas flow of about 925m³/hr and a steady site suction of around -80mb. Despite engine repairs and replacements, gas abstraction and vacuum levels have remained consistent, demonstrating stable gasfield control throughout varying operational conditions.





6. Temporary capping of landfill cells that fail to contain odours.

It is good industry practice to provide temporary capping and Enovert has committed to a routine schedule of installation. A combination of the different types of temporary capping system have been installed appropriate to the areas on which they are deployed and accounting for methods of installation – steeper slopes being covered with fully welded plastic membrane and flatter areas with compacted clay. In addition to temporary capping Enovert have maintained a programme of permanent capping works (1m of engineered clay). The Site Status Plan below shows the extent of the capped areas and the operational area where waste is deposited which is being maintained as a small discrete working area.



Once capping is installed it is necessary to periodically survey the cap to assess its performance. Emission points can occur, particularly on areas of temporary cap, where it ties into the operational landfill (i.e. into waste where the leading edge of the capping advances behind the waste deposit). Similarly, gas and leachate well infrastructure must be brought up through the cap. Sealing around protrusions is an area for assessment post construction and periodically as the waste mass settles around the structure.

Both Enovert and NRW have undertaken surface emission surveys at Hafod on the temporary and permanent capping and around surface penetrating structures. The surveys identified areas, around the tie-in detail and some protrusions where Enovert then undertook further works to improve sealing and these repairs themselves were then subjected to further survey.

A typical repair involves the placement of additional clay to improve sealing or in difficult to seal areas use of bentonite (a naturally occurring clay product that once hydrated provides a seal) or use of a “boot” on plastic capping and as can be seen in the images below. Sealing in this way enables us to pull, under vacuum, as hard as is possible on the gas system to capture as much landfill gas as possible. The capping installed at site is performing as designed - minimising surface emissions, preventing ingress of rainfall (reducing leachate generation) and providing a seal against which we can pull to abstract landfill gas.





7. Persistent leaks from multiple area of the site.

It is not possible to completely cap the whole site as some operational areas for waste disposal must remain open to facilitate infilling with waste. Enovert do install temporary horizontal gas abstraction pipework in these areas, to collect landfill gas as soon as its generated, but open operating areas can experience surface emissions on outer flanks and around surface penetrations such as leachate wells.

In addition to temporary capping (as discussed above) we do apply thicker layers of waste soils and clays, low permeability materials, to act as intermediate cover allowing us to maintain as high a vacuum as possible across these areas of site. As soon as the waste depth is deep enough ($\geq 10\text{m}$ to ensure drilling does not compromise the basal/sidewall lining systems) to support the drilling of deep vertical gas abstraction wells we drill the area and install further temporary abstraction. These works are planning and scheduled in advance by Enovert, and we are proactive in extending the abstraction system and operating it to recover as much landfill gas fuel as possible.

While industry guidance and the environmental permit do not technically require assessment of surface emissions on the operational areas, we have worked with NRW to undertaken routine survey and inspection across all areas. However, we recognise that such areas may from time-to-time experience surface emissions and where possible have installed additional abstraction or capping infrastructure to increase gas capture rates as far as is practical. The site exceeds the industry standard gas capture rate (85% of the theoretical gas production rate as modelled by Gassim) with Enovert undertaking additional works and specialised surveys to ensure we are at the forefront of landfill emissions reduction and gas capture technology.

8. Delays in infrastructure upgrades, leaving the site vulnerable to excessive emissions.

Enovert have not deliberately delayed installation of any infrastructure critical to the control of landfill gas or environmental engineering infrastructure. Some works are weather dependant - such as capping with plastic on steep slopes which for genuine reasons of safety cannot be undertaken in wet weather. Any such weather delay has however been minimal and the rate at which works at the site have been completed has not left the site vulnerable to fugitive gas emissions as evidenced by the gas capture rate detail in the graphs above. The site has remained under abstraction, collected gas has been consistently managed via a combination of engines or flare, planned works and those agreed in action plans with NRW have been completed and as these works have been completed, we have seen a reduction in the level of odour complaints.

9. In May 2020, a substantial fire broke out, burning for several days and producing thick black smoke. NRW recorded air pollution levels 14 times above the permitted level.

This is accurate and refers to a fire that occurred at the site over five years ago in May 2020. It was an unforeseen event following which Enovert offered a public apology at the time. The source of the fire was thought to be a lithium battery deposited within a load of waste delivered to site. Delays with initially getting fire-fighting water to the location of the fire allowed it to spread, increasing the scale of the incident and the time then taken to bring it under control.

The risk of fire from such sources of ignition is not specific to Hafod or landfill sites as waste disposal facilities, but one that impacts the whole of the waste sector. Small electronic devices i.e. discarded fire alarms, vapes or similar devices containing lithium batteries can be incorrectly deposited in domestic and commercial waste streams. As a result there is an increasing trend of fires in waste facilities caused by lithium batteries see (<https://www.materialfocus.org.uk/?press-releases=over-1200-battery-fires-in-bin-lorries-and-waste-sites-across-the-uk-in-last-year>).

Following the fire at Hafod in 2020, Enovert implemented additional fire precaution measures to prevent and minimise the impact should a fire reoccur. These measures included:

- Contacting all customers to highlight the issue of batteries within waste and to request additional pre-disposal inspection.
- Training of Enovert staff on additional waste inspection regimes, fire prevention and fighting measures.
- Liaison with the local fire service reference selection of appropriately specified site based firefighting equipment.
- Installation of a pumped rising main to provide firefighting water around the site in the event of fire.

- Purchase of ground monitoring firefighting equipment held at site and capable of rapid deployment.
- Engagement with industry bodies, for example Environmental Services Association of which Enovert are a member organisation; to support initiatives and legislative and policy change to reduce fire risk across the waste management sector.

Waste Arisings

The Hafod site is permitted to accept a range of non-hazardous biodegradable wastes. There is no restriction in the permit or planning consent that limits inputs to a certain geography. The decreasing number of permitted landfill sites both local and nationally means some wastes now travel further to find suitable authorised disposal facilities. Based on the last full year of data (Jan 2024 to Dec 2024) which was a typical year for the Hafod site waste inputs were as follows:

Inputs from Merseyside are predominately from commercial and industrial sources but does include waste diverted, during periods of planned/unplanned outage, from Waste to Energy plants comprising residual or black bag waste which equates to just 10% of the site's annual inputs.

Hafod Landfill Inputs by Region

Merseyside	28%
Wrexham	25%
Cheshire	11%
Gwynedd	8%
Shropshire	7%
Flintshire	5%
Denbighshire	4%
Lancashire	4%
Greater Manchester	3%
Powys	1%
England other	1%
Anglesey	<1%

Ceredigion	<1%
Conwy	<1%
Wales other	<1%

Landfill Disposals Tax & Landfill Disposals Tax Communities Scheme

Landfill Disposals Tax (Landfill Tax in England) is payable on each tonne of waste deposited in the Hafod site and Enovert act as tax collector in that regard.

The Landfill Disposals Tax Communities Scheme (**LDTCS**) will fund projects within five miles of certain waste transfer stations or landfill sites. Eligible sites are those that reported sending more than 2000 tonnes to landfill in the reporting year and Hafod is one such site. The type of projects that can be funded by LDTCS are:

Biodiversity – create resilient ecological networks for the benefit of a range of habitats and species:

- Improve conditions to help native species, pollinators and provide opportunities for new planting
- Restore, maintain and enhance natural habitats
- Engage and support participation and understanding to embed biodiversity

Waste minimisation and the diversion of waste from landfill – promote awareness and best practice to reduce the amount of waste produced:

- Encourage prevention, re-use, recovery and recycling of waste
- Reduce food waste and support initiatives such as composting
- Engage and support understanding to enable waste to be seen as a resource

Wider environmental enhancements – bring wider community benefit through improving quality of place:

- Create community green spaces and support green infrastructure
- Bring neglected and run-down areas back into community use
- Maintain or improve community facilities, for example community halls

The scheme will provide local projects with main grants of between £5000 - £49,000 and “nationally significant” projects with a value between £50,000 - £250,000. Funding is awarded in funding rounds and a detailed review of funding undertaken by Welsh

Government in 2022 (A Review of the Landfill Disposals Tax Communities Scheme – Social Research Number 38/2022) shows granted totalling £600,000 were made in the Wrexham area for rounds 1-10.

Historically, prior to the Landfill Tax being devolved to Welsh Government in 2017 funding was instead awarded under the Landfill Tax Communities Fund Scheme. Between 2009 and 2017 the Enovert Community Trust was able to grant around £1.4 Million of community funds to projects local to the Hafod site.

Document is Restricted



Your Ref: P-06-1510
 Our Ref: I22219

29th August 2025

SENT BY EMAIL

Dear Lara Date

Ail Glerc, Pwyllgor Deisebau, Senedd Cymru / Second Clerk, Petitions Committee, Welsh Parliament

Hafod Senedd Petition. Call for evidence from PHW. Environmental Public Health Service (EPHS) Response.

Re: P-06-1510 Direct NRW to revoke the environmental permit and ensure the closure of Enover'ts, Hafod Landfill Site in Wrexham

Public Health Wales (PHW) is the national public health agency in Wales and exists to protect and improve health and wellbeing and reduce health inequalities for people in Wales.

PHW recognise that local people are concerned about odours around the landfill. A public health risk assessment of the site can be informed by environmental sampling and monitoring data. PHW is reliant on other agencies taking steps to obtain these data.

The Environmental Public Health Service (EPHS) within PHW has responded to requests for advice in support of Wrexham CBC's approach to gathering and interpretation of data. We have: -

- Stated that we support the need for site to operate effectively to reduce odours.
- Stated that occupational exposure standards for hydrogen sulphide are inappropriate to assess public exposures.
- Provided standards for hydrogen sulphide to assess public exposure (table 1)

Source	Time period	Guideline value	Note
WHO air quality guidelines	30-minute (average)*	7 µg/m ³ (5 ppb)	Based on odour annoyance
	24-hour (average)	150 µg/m ³ (107 ppb)	Based on eye irritation in humans
ATSDR-MRL**	Intermediate (up to 1 year)	30 µg/m ³ (20 ppb)	Based on lesions of the nasal olfactory epithelium in rats.
US EPA RfC***	For assessment of lifetime exposure	2 µg/m ³ (1 ppb)	Based on lesions of the nasal olfactory epithelium in rats.
Acute Exposure Guideline Levels (AEGLs)****	10 minutes	0.75 ppm	Notable discomfort, irritation, or certain asymptomatic non-sensory effects. However, the effects are not disabling and are transient and reversible upon cessation of exposure.

Table 1:- Standards against which to assess public exposure to odours

*The WHO guideline value of 7 µg/m³ (5 ppb) over a 30-minute averaging period is a short-term odour value protective of odour annoyance[1]

** An MRL is an estimate of the daily human exposure to a hazardous substance that is likely to be without appreciable risk of adverse non-cancer health effects over a specified duration of exposure. They are derived for acute (>1, ≤14 days), intermediate (>14, <364 days), and chronic (365 days and longer) exposure durations[2].

*** An estimate (with uncertainty spanning perhaps an order of magnitude) of a continuous inhalation exposure to the human population (including sensitive subgroups) that is likely to be without an appreciable risk of deleterious effects during a lifetime[3].

**** Acute Exposure Level Guidelines (AEGLs) are used by emergency planners and responders worldwide as guidance in dealing with rare, usually accidental, releases of chemicals into the air. AEGLs are expressed as specific concentrations of airborne chemicals at which health effects may occur. They are designed to protect the elderly and children, and other individuals who may be susceptible[4].

[1] E71922.pdf (who.int) and Frequently Asked Questions (FAQ) | Environmental Odors | ATSDR (cdc.gov)

[2] Minimal Risk Levels (MRLs) – For Professionals|Toxic Substances Portal|ATSDR (cdc.gov)

[3] Hydrogen sulfide CASRN 7783-06-4 | DTXSID4024149 | IRIS | US EPA, ORD

[4] About Acute Exposure Guideline Levels (AEGLs) | US EPA

- Suggested that for Total Volatile Organic Compounds (TVOC) the Air Quality Objective (AQO) for benzene is used as a conservative comparison. We recognise that it is unlikely that all/any VOCs would be benzene, but assuming that all VOC is benzene represents a worst-case scenario. However, if Wrexham CBC can make an informed estimation of what VOCs are likely to be present another standard could be used.
- Advised that the limited data that are available suggests the long-term (lifetime) health risk is low, but that the local community may be experiencing odour annoyance.

We have not had discussion around monitoring of particulate matter (PM); this is because hydrogen sulphide odour occurs as a gas.

We advised Wrexham CBC that PHW need not be informed of routine findings unless the data shows significant concerns e.g. concentrations are routinely above the exposure standards in table 1.

We have also advised that the following should be issued to the public when odours occur:-

Bad smells can sometimes make people feel unwell, we would expect this to be short-term and for the feeling to pass when the smell has gone. Closing windows and doors when smells are present, and opening them again when the smell has passed, can reduce exposure to smells and health effects.

We advise that anyone concerned about their health should seek medical attention.

Kristian James MPH CEnvH

Principal Environmental Public Health Specialist / Prif Arbenigwr Iechyd Cyhoeddus

Amgylcheddol

SENEDD PETITIONS COMMITTEE: HAFOD LANDFILL LIAISON GROUP

1 Introduction

1.1 The Liaison Group was set up to provide a communication link with residents and consists of representatives of Wrexham County Borough Council (WCBC), Natural Resources Wales (NRW), Local Councillors, representatives of Community Councils and local residents. Meetings were initially quarterly but over time this was reduced to four monthly and then to every six months. Because there has been a great deal of publicity recently concerning the rise in complaints, particularly regarding odour, the meetings have now reverted back to quarterly.

2 Odour

2.1 Residents of Johnstown and the surrounding communities, including Ruabon, Rhosllanurchrugog, Ponciau, Penycae, have had to endure noxious odours from this site for more than 20 years; often during the night, when the smells enter our homes. This happened recently when I had to close the bedroom window at 5.00 am, although the smell remained in the house long after the windows were closed. This issue has been raised in previous meetings, but we have not been given an explanation as to why this occurs so frequently outside the site's hours of operation.

2.2 During recent periods of hot sunny weather there have been comments and statements by Council Members, NRW etc, that following recent changes carried out at the site real improvements have been made, which they believe to be borne out by the reduction in the number of complaints regarding odour. However, as we know from bitter experience this is most definitely not the case. The problem is invariably much worse in cold, wet weather - two recent occasions of odour occurred on wet days.

2.3 The problems regarding odour are a regular topic for discussion at the Liaison Group meetings, when questions are asked and concerns raised. In response to these Enovert and NRW always seem to be able to provide, often repeated, reasons why it is not the fault of the landfill site. We have often been told, for example, that the odours are agricultural in nature or they have been caused not by the landfill, but by any one of a number of factories on the nearby Vauxhall Industrial Estate. (Liaison Group minutes 11 March 2025). When you have lived most of your life in an area where there are farms you tend to be able to recognise agricultural smells quite easily. Also living relatively close to a small industrial estate, where many residents actually work, you come to know those smells too. No other activities produce the horrendous gas smells that emanate from the landfill site.

It would seem that Hafod is not the only Enovert site which is experiencing serious problems regarding odour. Below is an outline taken from local press and the BBC news website detailing problems at two other landfills owned by Enovert, which are remarkably similar to those experienced at Hafod. The responses given by Enovert and the Environment Agency are also almost identical to those given for Hafod, as can be seen from the extracts below from coverage of events.

- **Highfield South Landfill Site, Walsall**

Birmingham Live 10 January 2020:

Is this the smelliest place in Britain? Disgusting landfill stench ruining people's lives.

'I wake up in the night with it. My son woke up about 3 weeks ago and he was physically sick. On an evening and in the night it is absolutely vile.'

'We wake up and the smell is in the house. All doors are shut, all windows are shut.'

BBC 23 March 2025:

Following a petition in 2019 to 'stop the horrendous smell from the landfill site' Enovert carried out work to repair and upgrade but the 'intolerable odour' persists. A spokesperson for Enovert said: 'Enovert's Highfield South landfill site is operated in accordance with its environmental permit.'

- **Bellhouse Landfill Site, Stanway, Nr Colchester**

BBC 15 February 2024:

Enovert agreed to undertake works to minimise the potential for odour. These works included the drilling of additional gas collection wells installation of temporary capping and increasing the application of daily cover materials. An Environment Agency spokesperson said, 'We are investigating recent reports of odour thought to be from the site. There are potentially several odours that could be attributed to the landfill. However, there are other potential sources of odour in the local area.'

BBC 29 July 2024:

Further increase in odour complaints; described as the 'Stanway Stink'. Enovert carried out work on cells, but odour persists. 'I wake up in the middle of the night ... the whole house will smell of it.'

Response from Enovert Chief Executive, Mark Silvester: 'We work within our environmental permit.'

- **Hafod**

BBC 23 October 2024:

Sleep does not even provide an escape from the smell for one neighbour of the site. 'I could be in a deep sleep and all of a sudden I start to heave so I have to go and shut the window.'

BBC 31 January 2025

'Even when the doors and windows are shut, the smell comes into the house.'

Mark Silvester said the company has undertaken 'capping and gas extraction system works' aimed at addressing odour emissions at the site. He also added, 'The landfill holds an environmental permit and is stringently regulated by NRW.'

2.4 The actual reporting of incidents has also been a contentious issue. I feel that the number of complaints does not always appear to give a true picture. When there is higher number of complaints than usual, we are told by NRW and Enovert that many of these don't appear to be genuine because they are, for example, anonymous. On the other hand, if the number of complaints is low, they congratulate themselves saying

that any improvements they have made have been successful. On one of these occasions, I and a number of others did genuinely report incidents of odours, but these were brushed aside because of the high number of complaints. Unfortunately, many people who once reported odour issues no longer do so because they now feel that it is a waste of time. In fact, at one meeting it was pointed out that because the validity of the incident reports was being queried, it was beginning to make people feel that they were no longer being believed or taken seriously.

Ironically, the timing of the Petitions Committee is somewhat advantageous to Enovert. The recent increased scrutiny has coincided with weather conditions that have traditionally produced lower odour levels, but as we move into autumn and the focus on the site has concluded, the gas smell will become unbearable again.

3 Air Quality Monitoring

Air quality monitoring is also of great concern because the site is so close to houses; not only as a nuisance issue but because of any possibility of risks to health. Recently four air quality monitors have been placed around the perimeter of the site and one on the Community Centre. I asked at a Liaison Group meeting at least six months ago if one could be sited on the Nant Parc Estate and it was generally agreed that one should be placed on the Bowling Club in Bryn Avenue. When asking for an update on this at the meeting of 11 March 2025 I was informed that the matter was ongoing, but I have since learned that this monitor is to be sited on the school on Bangor Road but to date no monitor has been placed at the school.

The data from the monitors is to be collected and analysed by a company appointed by Enovert. It is difficult to have confidence in this data because they have already admitted they are currently measuring hydrogen sulphide against the higher levels permitted within an industrial setting, where those exposed to it would be wearing protective clothing. Furthermore, in August 2024 it was stated that levels of hydrogen sulphide at the Walley's Quarry landfill site in Staffordshire had been consistently under reported by the Environment Agency, from the initial installation of the equipment in 2016 right up until August 2023, due to the air quality monitors being incorrectly calibrated.

4.0 Stakeholders Group

Earlier this year a stakeholders group was set up by WCBC but there is no representation of residents on this group. Whilst I appreciate that it is not always possible to include everyone at these meetings, I do feel that by virtue of the fact that we, the people who live and work here, and are the most affected by the site on an almost daily basis, should have been represented, even if only in a small way. In response to a query regarding this we were told that all the members of the stakeholders group were working on our behalf and that the information would be filtered down to us. Most of the information is put on websites etc. which is not always accessible to everyone.

5.0 Permit

One of Enover's most frequent responses to any complaints about the site is 'we are working in accordance with the permit'. The permit was granted more than 20 years ago and in that time many things have changed. For example, today it is stipulated that a landfill should be much further away from residential properties. At Hafod the nearest houses are only separated from the boundary of the site by a railway line.

Waste disposal legislation has already evolved during the time that Hafod has been open and who is to know what changes may take place in the future. With the permit covering such a long period of time, permissions should be revisited in order to confirm that landfill still remains the most suitable outlet for waste.

6.0 Conclusion

The seemingly 'cut and paste' responses from Enover and NRW, where they go into great technical detail showing how much work they have been doing, or stating they are operating within their permit, show an inherent indifference to the realities of living in such close proximity to the landfill. We have already endured the effects of this site for more than 20 years and these will continue for at least another 30 years. Residents born around the turn of the millennium will not have known a time before the pervasive smell in the local area. With the permit allowing waste to be deposited until 2055, there is a good chance that some individuals in the village will have had their whole lives blighted by the gas and it is those without the means or opportunities to move away from their birthplace who will bear the greatest consequences in terms of health risks and poorer quality of life.

Ann Griffiths

- 1 INTRODUCTION: My name is Dorothy Tunnah and I have lived at [REDACTED] since 1963. My house is very close to Hafod Landfill site.
 - 1.1 I have been involved with Hafod Environmental Group since they were formed in 2006, to protest about the opening of a landfill site so close to two large housing estates, the closest of which also includes the local primary school, 2 football fields, play area, community centre and the local scout hut.
 - 1.2 Hafod Environmental group was formed by local residents who were concerned about health and nuisance problems, i.e. gas emissions, odour, seagulls and dust. I have been on the liason committee since 2008 when Enover (originally called Cory) bought the site.
 - 1.3 Wrexham council originally rejected the application in 2006, but MWH who owned the site originally appealed to the Welsh Office and Carwyn Jones overturned the decision by Wrexham.
 - 1.4 Over the years the group fundraised several thousands of pounds to try and stop the landfill, without success, being let down continually by local government, The Senedd, NRW, Public Protection and European Parliament.

- 2 ODOUR : As we always feared we have had trouble with odours from the start on a regular basis, but particularly when the weather is cold or raining. The weather has been good for the last few months with very little rain so not so much odour. Wrexham council are convinced that everything has been sorted but on 27th July it rained during the night and I had to get up and close all the windows as the odour was horrendous.
 - 2.1 The odour is not only obnoxious but as it is caused by rotting material it results in releasing gas which can be dangerous to health. The reason Monitors were required.

- 3 MONITORS: We have asked a number of times over the years for monitors to be fitted on the landfill site and in the village but this request was ignored until the odour was so bad at the end of last year.
 - 3.1 After a meeting by Wrexham Council at the beginning of the year they finally agreed to have a monitor fitted on the Community Centre and Enover agreed to put 4 around their site. Another one has been agreed to go on the Bowling green, but this hasn't yet been installed.
 - 3.2 The monitors have been fitted for several months now but the residents are still waiting for the results. They are all being monitored by Enover, including the council one. They say they are making sure it is accessible to all to read and understand. Another 7 months that we don't know what we are breathing in. I think that the council owned Monitors should be read regularly by an independent company not the one used by Enover.

- 4 PERMIT: The reason both NRW and Enovert use for complaints is that they are working to the permit. We say at nearly every Liason meeting that the Permit is not fit for purpose.
 - 4.1 When asked last year if they accepted material from any companies who have particularly odorous waste they admitted two companies did but they asked them to come during the morning so that it could be covered up quickly. One was a sewage company. NRW were quick to say that it was covered by the Permit.
 - 4.2 I looked back at the minutes recently but realised this was not in the minutes . I have looked back at other minutes and realised that other questions asked by our group have been missed out. Surprise , surprise Enovert take the minutes.

- 5 COMPLAINTS: Please note that that the number of complaints sent to NRW is not a true picture of the problems. Most people, including myself, have stopped complaining to them as they know nothing ever gets done. If you complain they ask if you want feed back, but that very rarely happens. They say in our meetings that they have too many complaints to get back to everyone. NRW have only just started to do visits without prior arrangements. C
 - 5.1 I have included some photographs taken by a resident when a local factory was pulled down to make room for housing. You can clearly see the site, and how close it is to the housing. These photos were taken on a Saturday afternoon and the following Sunday morning when the site was closed. Enovert hadn't mentioned anything about a problem on site until I produced the photos. We were then told the machine, which covers the rubbish, had broken down that day. We have noticed for years that the smell is always worse at weekends and have wondered if the site was being covered every night.



5.2 Other photos are of a lorry crossing the site, with all the seagulls and dust all around.



5.3 Seagulls regularly rest on the football and playing fields when the site is closed.

5.4 There was a large fire on site on May 27th 2020, after the site had been closed for the night, that took several days to be put out. Residents were told to keep all doors and windows closed and people from several miles away were affected. We were never told how the fire started.

5.5 We had rain on August 14th 2025 and at 7 o'clock that evening this soapy looking water just was outside the gate to the Landfill. It looks as if it is leachate but no doubt we will be told different. I have included a photo.



6 CONCLUSION: The site should be closed as soon as possible as Cory/Enovert have had 18 years to run the site correctly and not cause harm and anxiety to the whole village. They just tell us how many new wells they put in. We were told at the beginning that a bond was being held for restoration so there should not be a problem.

6.1 ODOUR: Enovert has given excuse after excuse, year after year for the odour and they have been allowed to get away with it because people in power like NRW and Public Protection have allowed them to hiding behind the Permit.

6.2 MONITORS: After 18 years monitors have been fitted but months later we are still waiting for the results. Why are Wrexham council letting Enover's company read their monitors, there should be an independent company for Wrexham

PERMIT: Why after all the complaints isn't someone looking at the Permit. It has never been suggested by any of the agencies, just the public. It is not fit for purpose.

P-06-1515 Urgent installation of CCTV at Porth Train Station and bridge.

Y Pwyllgor Deisebau | 22 Medi 2025
Petitions Committee | 22 September 2025

Reference: SR25/11930-2

Introduction

Petition Number: P-06-1515

Petition title: Urgent installation of CCTV at Porth Train Station and bridge.

Text of petition: Urgently request the installation of CCTV at Porth Train Station and the bridge that spans the train tracks. This area has increasingly become a hotspot for antisocial behaviour, groups of individuals bullying and intimidating young children, passengers, and local residents. Reports have highlighted incidents of intimidation, substance abuse, vandalism to shops and the throwing of bricks at nearby properties.

This is creating an unsafe environment for those who live, work, or travel in the vicinity.

Despite repeated concerns raised with law enforcement, little progress has been made in addressing the growing problem.

As a result, residents and passengers feel vulnerable and unsupported. The lack of security measures is a concern for parents, commuters and the wider community.



Installing CCTV at Porth Train Station and the bridge is a crucial step to ensuring the safety and wellbeing of residents and commuters. Visible, active CCTV systems would act as both a deterrent to criminal behaviour and a tool for law enforcement in identifying and prosecuting offenders.

The duty of care owed to the community is not being adequately met, and immediate action is required to protect young children, passengers, and residents from harm. We urge the relevant authorities to take this matter seriously and prioritise the safety of the community by installing CCTV as a matter of urgency.

The text provided above is submitted by the petitioner. The petitions team make every effort to ensure it preserves their authentic voice. This text has not been verified for accuracy, or errors, and may contain unverified opinions or assertions.

Mae'r testun uchod yn cael ei gyflwyno gan y deisebydd. Mae'r tîm deisebau yn gwneud pob ymdrech i sicrhau ei fod yn cadw ei lais dilys. Nid yw'r testun hwn wedi'i wirio am gywirdeb, neu wallau, a gall gynnwys barn neu honiadau heb eu gwirio.

1. Background

Porth station is located a short walk from Porth town centre and integrates bus and rail services. The new interchange, owned by Transport for Wales (TfW), was [opened in January 2025](#). According to [TfW's website](#), the station is staffed part-time and has CCTV in operation.

[British Transport Police](#) (BTP) is responsible for policing on the railways while policing in the area more generally is the responsibility of South Wales Police.

In June 2024, it was [reported in the media](#) that Porth station had the joint highest (alongside Abercynon) instances of anti-social behaviour (ASB) on the [Core Valley Lines](#) network that year to date.

The Porth neighbourhood policing team [lists ASB as one of its priorities](#). An [interactive crime map](#) on its webpages shows incidents of crime occurring around the station.

2. Welsh Government action

In his letter to the Chair dated 28 July, the Cabinet Secretary for Transport and North Wales, Ken Skates MS says that TfW is aware that the station is a location of

repeated ASB and is engaging with BTP and South Wales Police. He also states “I have asked my officials to specifically raise the issues at Porth Station with the BTP in their regular meetings with them”.

He also states that there are existing “CCTV cameras at Porth station and in the Interchange building which are monitored by TfW’s security team”.

3. Welsh Parliament action

This issue does not appear to have previously been raised in the Senedd.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.

Ken Skates AS/MS
Ysgrifennydd y Cabinet dros Drafnidiaeth a Gogledd Cymru
Cabinet Secretary for Transport and North Wales



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1515
Ein cyf/Our ref KSNWT/01120/25

Carolyn Thomas MS
Chair - Petitions committee

28 July 2025

Dear Carolyn,

Thank you for your letter of 4 July regarding P-06-1515 – Urgent Installation of CCTV at Porth Train Station and Bridge.

Passenger and staff safety are my number one priority. Transport for Wales (TfW) are aware that Porth station is a repeat location for antisocial behaviour and are taking steps within their power to address this. TfW are engaging with the British Transport Police to increase their presence, and with South Wales Police. TfW's own security contractors, Silurian, have established regular direct patrols of the station with the expectation that this will reduce the amount of unacceptable antisocial behaviour.

We provide grant funding directly to the British Transport Police to support the recruitment and employment of a number of PCSOs. I have asked my officials to specifically raise the issues at Porth Station with the British Transport Police in their regular meetings with them.

I understand that there are CCTV cameras at Porth station and in the Interchange building which are monitored by TfW's security team. At present there are no plans for CCTV upgrades at Porth Station, though this will be kept under review.

Yours sincerely,

Ken Skates AS/MS
Ysgrifennydd y Cabinet dros Drafnidiaeth a Gogledd Cymru
Cabinet Secretary for Transport and North Wales

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Cardiff University- Nursing

Y Pwyllgor Deisebau | 22 September 2025

Petitions Committee | 22 Medi 2025

Reference: RS25/11930/3

Introduction

Petition Number: P-06-1516

Petition title: Enable Cardiff University to keep the Nursing degree course

Text of petition:

Cardiff University's intention to cut the nursing degree programme is a huge loss to the future of nursing and the NHS. The loss in staff will have a significant impact on current students' studies. In 2023 Cardiff University's nursing programme ranked 1st in Wales and 5th in the UK. Cutting the course is not the solution nor is it in the best interest of healthcare in Wales. Nursing needs to be supported to be a viable degree option through improved student bursary funding.

The text provided above is submitted by the petitioner. The petitions team make every effort to ensure it preserves their authentic voice. This text has not been verified for accuracy, or errors, and may contain unverified opinions or assertions.

Mae'r testun uchod yn cael ei gyflwyno gan y deisebydd. Mae'r tîm deisebau yn gwneud pob ymdrech i sicrhau ei fod yn cadw ei lais dilys. Nid yw'r testun hwn wedi'i wirio am gywirdeb, neu wallau, a gall gynnwys barn neu honiadau heb eu gwirio.



1. Background

1.1. Update

Since this petition (P-06-1516) was opened, Cardiff University has announced the intention to retain nursing albeit with smaller cohorts and a new delivery model.

This briefing will cover why nursing was proposed to be cut by Cardiff University and how the current decision to retain nursing has developed.

Further information on the funding element of the nursing degree is provided to inform consideration of the petitions call for improved student bursary funding.

1.2. The consultation

On 28 January 2025, Cardiff University launched an official consultation on “proposed changes designed to realise its ambitions and secure the University’s long-term future”, entitled ‘[Our Academic Future](#)’.

Within this consultation, nursing was proposed for discontinuation, stated to be because of factors beyond finances including National Student Survey scores, ability to meet recruitment targets that are externally set, and the challenges of recruiting students in competition with other local providers.

As part of the Children, Young People and Education Committee’s (CYPE) short piece of work exploring the challenges facing the HE sector, the Chair wrote to all Welsh Universities, [the letters can be found here](#). Cardiff University’s [written response](#) to this letter confirmed these factors as contributing to its decision to propose discontinuing nursing provision. Additionally, in an oral evidence session held on 12 June, these factors were [reiterated to the Committee](#).

1.3. Response to announcement and decision to retain nursing

There was a strong response to Cardiff University’s ‘Our Academic Future’ consultation from a range of stakeholders. This included [Health Education and Improvement Wales](#) (HEIW) and the [Royal College of Nursing](#) (RCN) (Wales) calling for Cardiff University to retain its nursing provision.

In April 2025, media outlets, such as [the BBC](#), reported that Cardiff University was putting its plans on hold to close the nursing department, as an alternative plan was being considered. The BBC reported this alternative proposal included teaching smaller undergraduate nursing cohorts. Although this alternative

proposal was contingent on further discussions with the Welsh Government and NHS bodies.

Organisations such as [UNISON](#) and [RCN \(Wales\)](#) stated the decision for Cardiff University to keep its School of Nursing was the right decision. Though RCN (Wales) criticised the handling of the situation by Cardiff University.

This alternative proposal was included within a presentation of the Our Academic Future business case presented to the University's Council on 17 June 2025. On 18 June 2025, [a letter to students](#) confirmed the University Council approved the business case.

1.4. Call for improved bursary funding

The petitioner is not alone in calling for improved bursary funding. On 12 May 2025, following Cardiff University's stating it intends to retain nursing, [RCN \(Wales\)](#) called for better financial support for student nurses. This call cited 'stagnant' financial support for nursing students during a 'spiralling cost of living crisis'.

There are two statutory funding streams:

1. NHS Wales Bursary
2. Standard student package

The NHS Wales Bursary Scheme provides financial support for home UK students studying an eligible healthcare course in Wales, who are willing to commit to working in Wales after qualifying.

[Health Education Improvement Wales \(HEIW\)](#) produced an [infographic](#) to outline what students may receive from the NHS Wales Bursary Scheme for the 2024/25 academic year. This includes a non-repayable grant of up to £1,000 per academic year, tuition fees of £9,000 per academic year (which do not need to be repaid if recipients complete the requirement to work in Wales) and a means tested grant (based on household income) of up to £2,643 if living away from the parental home or £2,207 if living in parental home.

The websites of [Bangor University](#) and [Cardiff University](#) state the same figures are available for the 2025/26 academic year.

Changes made for the 2024/25 academic year included allowing eligible full-time, Welsh-domiciled students to access the full amount of maintenance support from Student Finance Wales, in addition to the NHS Bursary. A [written statement](#) from the then Health Minister in November 2023, Eluned Morgan, stated this change was implemented to help students during the cost of living crisis.

[HEIW's website](#) states this change replaces the previous system of students only having access to a reduced rate of maintenance loan available.

[HEIW's infographic](#) outlines that for the 2024/25 academic year, the maximum amount of maintenance loan available for Welsh domiciled students was £9,315 for students living in parental home or £11,150 for students living elsewhere. In comparison, the reduced rate maintenance loan which would have been available would have been £4,475 for students living in parental home or £5,360 for students living elsewhere.

Figures for the academic year 2025/26 are included in Student Finance Wales' [NHS Guidance](#). The maximum amount of maintenance loan available for students living in parental home is £9,480 while the maximum available for students living elsewhere is £11,345.

HEIW published a separate set of [FAQs for May 2025](#). This publication indicated that all eligible full-time, Welsh domiciled students receiving the NHS Wales Bursary have access to the full maintenance loan from Student Finance Wales. However the FAQs say that all other UK applicants may be eligible for the reduced rate of student maintenance loan from their respective Student Finance funding body and would need to speak with them directly.

Additional allowances may also be available to some students dependent on personal circumstances. [HEIW's FAQs for September 2024](#) lists such allowances which include; a Dependants Allowance, a Parent Learning Allowance, a Childcare Allowance, a Disabled Students Allowance and an allowance to cover clinical/practice placement costs. In addition, there is also a means tested 'Extra Weeks Allowance' available for those whose chosen courses run for more than 30 weeks. Each of the above have individual eligibility criteria.

Students also have the option to opt out of the NHS Wales Bursary scheme and instead opt for the full package of support from Student Finance Wales if they desire to do so as stipulated in Student Finance Wales' [NHS guidance](#).

2. Welsh Government action

In Welsh Government's response to this petition, the Minister for Further and Higher Education, Vicky Howells MS, has reiterated the position that it would not be appropriate for Welsh Ministers to intervene in such matters given Welsh universities are autonomous institutions responsible for their own academic affairs, including course delivery and provision.

While not intervening directly with universities decisions regarding course delivery and provision, the Minister stated she has been engaged in dialogue within the higher education sector and has met with the Vice Chancellor of every Welsh university as well as representatives of unions.

The Minister also outlined that Cardiff University and Health Education Improvement Wales (HEIW) have been working on the future of nursing provision at Cardiff with planning underway to retain the Nursing Department and to continue delivering its nursing provision. Welsh Government says it expects to receive a full working plan from them over the coming weeks (letter dated 17 July 2025).

Regarding the funding available to students, Welsh Government allowed access for eligible students to gain the full amount of maintenance loan from Student Finance Wales in addition to the Bursary from academic year 2024/25 to help students deal with the cost of living crisis.

Further to this change in the financial support available, the Cabinet Secretary for Health and Social Care stated in March 2025 that Welsh Government is launching a consultation later this year to help understand the incentives and conditions needed to continue to attract students to study and work in Wales beyond graduation.

With the change of enabling Welsh domiciled learners access to the full Student Finance Wales maintenance loan in addition to the NHS Wales Bursary scheme, FAQs published by HEIW state “The Welsh Government are unable to make decisions or influence student support policy provided by other home nations”.

3. Welsh Parliament action

The Children Young People and Education Committee is conducting a short piece of work looking at the challenges facing Welsh Universities including the proposed changes at Cardiff University.

On 12 June 2025 Vice-Chancellor Wendy Lerner attended Committee to give evidence alongside Cardiff University’s Chair of Council, Patrick Younge. During this evidence session Committee heard Cardiff University “plan to retain nursing”.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings

are not necessarily updated or otherwise amended to reflect subsequent changes.



Eich cyf/Your ref P-06-1516
Ein cyf/Our ref VH/00320/25

Carolyn Thomas MS

Chair - Petitions committee

17 July 2025

Dear Carolyn,

Thank you for your letter of 4 July regarding Petition P-06-1516 Enable Cardiff University to keep the Nursing degree course.

The higher education sector in Wales and across the UK, is facing financial pressures and working on ways to respond to these challenges. As autonomous institutions, responsible for their own academic affairs, including course delivery and provision, it would not be appropriate for Welsh Ministers to intervene in such matters.

However, to further understand the pressures facing the sector and explore how the Welsh Government can provide support through this difficult period I have been engaged in dialogue with the sector since being appointed in September. I have met with the Vice Chancellor of every Welsh university, representatives of Universities and Colleges Union, including Cardiff University, and the National Union of Students and I continue to engage with the sector.

Specifically in relation to Cardiff University's plans for its Nursing Department, it announced in April that it was placing its plans to close the Nursing Department 'on hold' while it considered an alternative plan for nursing provision. Cardiff University and Health Education Improvement Wales (HEIW) have been working closely on the future of nursing provision at Cardiff, with planning under way to retain the Nursing Department and to continue to deliver its nursing provision. HEIW continue to explore all available options to ensure the continuity of provision and we expect to receive a full working plan from them over the coming weeks.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

I hope this clarifies the position and look forward to hearing the final plans in due course.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'V. Howells', with a long, sweeping underline stroke.

Vikki Howells AS/MS

Y Gweinidog Addysg Bellach ac Uwch
Minister for Further and Higher Education

Cardiff University- Modern Languages

Y Pwyllgor Deisebau | 22 September 2025
Petitions Committee | 22 Medi 2025

Reference: RS25/11930/4

Introduction

Petition Number: P-06-1517

Petition title: Help Cardiff University to keep their Modern Languages degree courses

Text of petition:

Cardiff University's Executive Board proposes to cut all Modern Languages degrees. Losing Modern Language provision at Cardiff will severely impact student recruitment, student life and degree possibilities, and ultimately will damage the University's reputation and international standing. It will also damage language learning in Wales, and any opportunity for Welsh people to study languages degrees in their capital city.

The Welsh government says: 'Our vision is that Wales becomes a truly multilingual nation. It is a Programme for Government commitment to 'expand the teaching of modern foreign languages in our schools'. We want to increase the number of learners studying languages, whatever their background or needs.

'Wales is a confident, forward-looking nation, and we will support all our learners to be citizens of Wales and the world. We want all our learners to reach their full potential and experience the many benefits of learning international languages,



including broadening their horizons by learning about other people and cultures and equipping them with the language skills to compete in the global economy.'

Global Futures: A plan to improve and promote international languages in Wales 2022 to

2025 <https://www.gov.wales/sites/default/files/publications/2023-11/atish19152doc5a.pdf>

Please uphold this, and refuse to lose Modern Language degree programmes from our capital city.

The text provided above is submitted by the petitioner. The petitions team make every effort to ensure it preserves their authentic voice. This text has not been verified for accuracy, or errors, and may contain unverified opinions or assertions.

Mae'r testun uchod yn cael ei gyflwyno gan y deisebydd. Mae'r tîm deisebau yn gwneud pob ymdrech i sicrhau ei fod yn cadw ei lais dilys. Nid yw'r testun hwn wedi'i wirio am gywirdeb, neu wallau, a gall gynnwys barn neu honiadau heb eu gwirio.

1. Background

1.1. Update

Since this petition (P-06-1517) was opened, Cardiff University has announced the intention to retain modern languages in a new School of Global Humanities albeit with a smaller cohort and a revised offer of languages.

This briefing will cover why modern languages was proposed to be discontinued by Cardiff University and how the current decision to retain modern languages has developed.

1.2. The consultation

On 28 January 2025, Cardiff University launched an official consultation on “proposed changes designed to realise its ambitions and secure the University’s long-term future”, entitled ‘[Our Academic Future](#)’. This consultation included a proposal to cease subjects and programmes in modern languages and translation.

As part of the Children, Young People and Education Committee’s (CYPE) short piece of work exploring the challenges facing the higher education sector, the Chair wrote to all Welsh Universities, [the letters can be found here](#). Cardiff University’s [written response](#) to this letter outlined the proposal to discontinue modern languages provision was due to ‘a significant and sustained drop in student demand’.

1.3. Response to announcement and decision to retain modern languages

There was a strong response to Cardiff University’s ‘Our Academic Future’ consultation regarding discontinuing modern languages from a range of stakeholders. This included the [University Council for Languages](#) and the University and College Union Cardiff which is associated with a [website campaigning](#) to save the teaching of modern languages at Cardiff University.

The [University Council for Languages](#)’ concerns with Cardiff University’s proposal included the loss of some modern language provision in Wales. In addition, there were concerns that the proposal was at odds with the Welsh Government’s Programme for Government commitment to modern foreign languages, its investment in the Global Futures strategy for international languages and its International Strategy pledge to support the language skills of young people as part of its global responsibility.

On 27 May 2025 Cardiff University announced that the University Executive Board approved an [alternative proposal](#) for the School of Global Humanities as part of the 'Our Academic Future' process.

This alternative proposal outlined Cardiff University "will continue to offer modern languages and music research and education at Cardiff, albeit with revised structures and with a smaller staff base, based within a new School of Global Humanities". This included continuing to offer modern languages programmes primarily in French, Spanish, Mandarin and Japanese.

This alternative proposal was included within a presentation of the Our Academic Future business case presented to the University Council on 17 June 2025 for approval. On 18 June 2025, [a letter to students](#) confirmed the University Council approved the business case.

2. Welsh Government action

In Welsh Government's response to this petition, the Minister for Further and Higher Education, Vicky Howells MS, has reiterated the position that it would not be appropriate for Welsh Ministers to intervene in such matters given Welsh universities are autonomous institutions responsible for their own academic affairs, including course delivery and provision.

While not intervening directly with universities decisions regarding course delivery and provision, the Minister stated she has been engaged in dialogue with the higher education sector and has met with the Vice Chancellor of every Welsh university as well as representatives of unions.

Further, the Minister for Further and Higher Education, Vicky Howells MS, recognised Cardiff University revised its restructuring proposal which now included retaining modern foreign languages at a reduced and rationalised scale (where Portuguese, German and Italian will be discontinued).

3. Welsh Parliament action

The Children, Young People and Education Committee are conducting [a short piece of work](#) looking at the challenges facing Welsh Universities including the proposed changes at Cardiff University.

On 12 June 2025 Vice-Chancellor Wendy Lerner [attended Committee to give evidence](#) alongside Cardiff University's Chair of Council, Patrick Younge. During

this evidence session, the Committee heard Cardiff University 'plan to retain modern languages'.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.

Vikki Howells AS/MS
Y Gweinidog Addysg Bellach ac Uwch
Minister for Further and Higher Education



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1517
Ein cyf/Our ref VH/00321/25

Carolyn Thomas MS
Chair - Petitions committee
Senedd Cymru
Cardiff Bay
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CF99 1SN

4 August 2025

Dear Carolyn,

Thank you for your letter of 4 July regarding Petition P-06-1517 Help Cardiff University to keep their Modern Languages degree courses.

The higher education sector in Wales, and across the UK, is facing financial pressures and working on ways to respond to these challenges. As autonomous institutions, responsible for their own academic affairs, including course delivery and provision, it would not be appropriate for Welsh Ministers to intervene in such matters.

However, to further understand the pressures facing the sector and explore how the Welsh Government can provide support through this difficult period I have been engaged in dialogue with the sector since being appointed in September. I have met with the Vice Chancellor of every Welsh university, representatives of the Universities and Colleges Union, including Cardiff University, and the National Union of Students and I continue to engage with the sector.

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We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

In January, Cardiff University announced a consultation on restructuring proposals and the likely loss of 400 FTE jobs. This initially included closure of certain provision, including Modern Foreign Languages (MFL), and changes to merge or reduce the number of schools/departments. Following a review of its consultation responses, Cardiff University drafted a revised restructuring proposal, which was approved by its University Council on 17 June. This proposal included retention of MFL at a reduced and rationalised scale. The MFL department (with the exception of Portuguese, German and Italian) will remain open with a smaller cohort of students and will join a new school of Global Humanities, along with the departments of Welsh, English, Communication, Philosophy, Music, History, and Archaeology.

I want to emphasise my commitment to supporting our universities. Our universities are crucial to our ambitions for improving public services, growing the economy, and enabling the wellbeing of future generations. The Welsh Government will continue to work with the sector and other partners, alongside Medr, to negotiate this challenging time and safeguard the future of higher education in Wales. The [Written Statement](#) of 3 March sets out the Welsh Government commitment and the next steps we are taking in supporting a sustainable higher education sector in Wales.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'V. Howells', with a long, sweeping underline stroke.

Vikki Howells AS/MS

Y Gweinidog Addysg Bellach ac Uwch
Minister for Further and Higher Education

P-06-1519 Implement safety measures at the A477 Red Roses junction to reduce accidents and stop any fatalities

Y Pwyllgor Deisebau | 22 Medi 2025

Petitions Committee | 22 September 2025

Reference: SR25/11930-7

Introduction

Petition Number: P-06-1519

Petition title: Implement safety measures at the A477 Red Roses junction to reduce accidents and stop any fatalities

Text of petition: The A477 from St Clears west into Pembrokeshire is a busy route used by local residents, holiday traffic, ferry traffic and deliveries throughout West Wales

The Red Roses junction is a 90 degree turn at the bottom of a hill with no slip road. You can take it at no more than 20mph, with trunk road traffic behind you travelling downhill at often 70mph, and no way to move off the main A477. It is frightening.

We ask the Welsh Government to make this a safe junction before lives are lost.



Ever since the junction was opened in 2014 local residents have been campaigning to have this junction improved. The signpost has been hit many times. Vehicles have gone through crash barriers and ended up in the nearby ditch. There have been multiple collisions reported to the police and many many more near misses we know about. Welsh Government's own December 2021 monitoring stated 57% of vehicles were exceeding the speed limit.

Past and present local politicians supported our cause, but the Welsh Government responds with such as 'accidents rates are below 60% of the typical rate for comparable roads' [quote from Minister's letter July 2019].

We consider that the junction needs good lighting - it has no lighting at all currently - and proper speed reduction measures at the junction approach. Really it also needs a slip road so that vehicles can reduce speed safely off the main carriageway.

Please support our petition to improve the safety of this stretch of road.

The text provided above is submitted by the petitioner. The petitions team make every effort to ensure it preserves their authentic voice. This text has not been verified for accuracy, or errors, and may contain unverified opinions or assertions.

Mae'r testun uchod yn cael ei gyflwyno gan y deisebydd. Mae'r tîm deisebau yn gwneud pob ymdrech i sicrhau ei fod yn cadw ei lais dilys. Nid yw'r testun hwn wedi'i wirio am gywirdeb, neu wallau, a gall gynnwys barn neu honiadau heb eu gwirio.

1. Background

The A477 junction with the B4314 in Carmarthenshire provides access to Red Roses village.

The A477 forms part of the [Strategic Road Network \(SRN\)](#), and is the responsibility of the Welsh Government. The [South Wales Trunk Road Agent \(SWTRA\)](#) has responsibility for day-to-day operation and maintenance of the SRN. The road provides links to South Pembrokeshire, including access to Pembroke Dock, Milford Haven, Tenby and Saundersfoot.

The Welsh Government completed the [A477 Trunk Road St Clears to Red Roses Improvement](#) project in April 2014. A series of improvements to the A477 had been undertaken since the 1980s. The original construction and alignment of St Clears to Red Roses section did not meet highway standards. The project saw

construction of 8.7km of new road between Pont Newydd Bridge and Red Roses Village as a single carriageway with over half its length carrying three lanes (known as a '2 + 1' arrangement).

Road Safety concerns were raised soon after the opening of the new road. Local politicians welcomed the new road but highlighted that the right angle turn into the village follows a fast downhill section of the road.

Senedd Research analysis of police accident data shows that there have been three collisions recorded within 100m of the junction between 2014 and 2023, all resulting in minor injuries.

However, it should be noted that police STATS19 statistical returns are used in official reporting of road accident data in Great Britain. These only record details of road traffic accidents that resulted in a personal injury and which were reported to the police within 30 days of the accident. The accident data will not include collisions which do not meet these criteria or near misses.

2. Welsh Government action

In 2016, following concerns from local communities and representatives, the Welsh Government undertook a road safety audit of the A477. As a result of this, additional advanced warning signs were installed and a 28 day safety inspection initiated. While monitoring continued, road safety concerns about the junction continued to be raised in subsequent years.

The Cabinet Secretary for Transport and North Wales's letter to the Chair regarding this petition notes concerns, and stresses that the road "was designed to current standards and compliant at the time of construction".

He continues, "driver behaviour is shown to be a major factor in the initial evidence and data available". He outlines a number of planned steps:

... design has been completed for ARAF/SLOW markings and enhanced road signs with yellow backing boards and the use of large static bollards to highlight the junction position. This is intended to enhance the presence of the junction for all users. The Road Safety Audit 1&2 is due to be completed for these designs before they can be taken forward.

A topographical survey has been completed for a potential police [speed] monitoring lay-by and work started on the

design to see whether it is possible to safely accommodate a monitoring layby within our highway land boundary.

He also says streetlights, referred to in the petition, “are not deemed a requirement under current UK design standards” given the volume of vehicles using the junction and police data suggesting they are not required. He indicates that a scheme has been added to the 2025-26 funding programme “to identify potential preventative short term safety interventions at Red Roses.”

In terms of road safety policy, the Welsh Government published its [Road Safety Framework in 2013](#) which set targets to be achieved by 2020. The current [National Transport Delivery Plan](#) commits to review the Framework between 2022 and 2024. [The Cabinet Secretary wrote](#) to the Climate Change, Environment and Infrastructure Committee in February 2025, responding to a request for a timeline for publication of the updated road safety strategy, saying:

This year I intend to work with our partners to agree a Memorandum of Understanding (MoU) that will provide a cohesive framework to coordinate focus on key areas such as, but not limited to, motorcyclist safety, rural roads, young and older drivers, e-mobility and impaired driving. It will align with the UK Government's emerging strategy adopting the globally recognised Safe System approach, founded on the ethical principle that it is never acceptable for people to be seriously injured or killed on the road network.

A National Road Safety Board will be set up to manage the MoU and will be made up of key partners. The Board will provide oversight, coordinate stakeholder efforts, monitor progress and ensure the agreed road safety objectives are met.

3. Welsh Parliament action

The issue has been raised on a number of occasions in the Senedd.

In June 2023, during First Ministers Questions, [Sam Kurtz MS raised the issue of road safety on the A477](#) as a whole, referring to Red Roses as well as Nash Fingerpost Junction, which was the [subject of a separate petition](#). He suggested the road “needs a complete and thorough review”.

In Plenary in April 2024 [Sam Kurtz MS welcomed](#) steps taken at Nash Fingerpost Junction, but again called for “a full review of safety along the A477 from St Clears

to Pembroke Dock, following a number of issues raised with me by residents of Milton, Red Roses and Llanddowror”.

The Cabinet Secretary responded to say he was “open to discussion about how to improve the whole of the A477 and if the Member would wish to have a meeting with me, I'm more than happy to discuss that further”.

In March 2025 Sam Kurtz MS again acknowledged “the success of improvements” at fingerpost junction but with regard to the A477 said, “while this junction itself is compliant with the rules, common sense dictates that it's not safe”.

He asked that the Red Roses junction, and a second on the Llanddewi Velfrey-Redstone Cross bypass, be “looked at in more detail and that the regulations that are used to build these junctions are updated.”

The Cabinet Secretary’s response, as in the letter to the Chair, was that the junction was compliant at construction, that driver behaviour is a major factor in evidence collected to date, and a scheme to identify “short-term safety interventions” is included in the 2025-26 programme.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.



Eich cyf/Your ref P-06-1519
Ein cyf/Our ref KSNWT/01126/25

Carolyn Thomas MS
Chair - Petitions committee

28 July 2025

Dear Carolyn,

Thank you for your letter of 4 July regarding P-06-1519 – to implement safety measures at the A477 Red Roses junction to reduce accidents and stop any fatalities.

I understand the safety concerns regarding this junction. While the A477 Red Roses junction was designed to current standards and compliant at the time of construction, driver behaviour is shown to be a major factor in the initial evidence and data available.

The continued concerns raised in the petition are noted, however design has been completed for ARAF/SLOW markings and enhanced road signs with yellow backing boards and the use of large static bollards to highlight the junction position. This is intended to enhance the presence of the junction for all users. The Road Safety Audit 1&2 is due to be completed for these designs before they can be taken forward.

A topographical survey has been completed for a potential police [speed] monitoring lay-by and work started on the design to see whether it is possible to safely accommodate a monitoring layby within our highway land boundary.

My officials alongside our agent and representatives of Eglwyscwmmin Community Council are in the process of arranging a meeting in July / August to discuss concerns and current proposals.

Turning to the request for street lighting and the use of deceleration tapers (slip-roads), these are not deemed a requirement under current UK design standards owing to the volume of vehicles using the junction and recorded collision data from police not suggesting a collision problem during hours of darkness. However, my officials will continue to monitor the junction.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

A scheme has been added to the 2025/26 funding programme to identify potential preventative short term safety interventions at Red Roses – in the case of the monitoring layby it will be conditional on not requiring third party land and gaining support from the Police and GoSafe.

Any resulting safety interventions will need to be prioritised against other safety schemes across the whole network and in alignment with current Welsh Government policy and criteria.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ken', is enclosed in a thin black rectangular border.

Ken Skates AS/MS

Ysgrifennydd y Cabinet dros Drafnidiaeth a Gogledd Cymru
Cabinet Secretary for Transport and North Wales

[REDACTED]

Kayleigh Imperato,
Deputy Clerk, Petitions Committee,
Senedd Cymru / Welsh Parliament

By email.

Dear Kayleigh,

Thank you for your email informing me the petition will be considered by Petitions Committee on 22nd September and also enclosing the letter from Ken Skates MS.

We appreciate the suggested extra measures, namely ARAF/SLOW markings; enhanced road signage; large static bollards. We hope they will better highlight the junction to all road users as was stated in the meeting held on 29th July with Welsh Government officials and a SWTRA representative. Any measures to prevent accidents and possible fatalities at this junction are worthwhile.

The letter from Ken Skates MS states that vehicle volume does not indicate a need for street lighting – we would like to know when exactly volume monitoring has been carried out. The A477 is a major holiday route as well as serving the local and regional community, and so the traffic pattern during a typical November week will be very different from that during July and August. Monitoring should take into account the traffic patterns for that junction throughout the year.

Could we be given clarity on the type of monitoring that has happened, and what will be as part of the continued monitoring at this location, please? In the meeting we were informed a full road width pressure strip would be logistically difficult to install and remove, but a light beam system could be installed. Is that going to happen? Would there be other methods as well such as camera tracking from a raised vantage point such as the nearby bridge?

It is hoped that the funds and land will be available to install a layby for speed monitoring as soon as possible in this financial year – we welcome that.

We maintain that there is a need for lighting because it would increase both visibility and safety during any periods of poor visibility which do occur during daylight hours, not just at night. Please see enclosed images of an accident in June 2021 which happened I understand between 9.00am and 10.00am in just such a situation. This is one of several times when the road sign has been damaged. I do not know if all such incidents are reported to the police.

This leads onto the ‘recorded collision data’ that is used by the Welsh Government as a metric. The incident referred to above does not seem to appear on Crashmap – which

suggests relying on purely collision data reported to the police, and not also sign damage incidents from SWTRA or Carmarthenshire CC, reports of minor shunts or near misses, insurance company data etc. means the data set is incomplete.

We appreciate that the junction was built in accordance with the DMRB at the time, although we just do not understand how a 90 degree turn off a main A road, at the bottom of a hill, does not require a slip road of some sort to enable traffic to pull off the main carriageway out of the way of the main traffic flow to slow down safely. Perhaps work could also be done to 'cut off the corner' of the left hand turn, pushing back the verge to enlarge the left hand turning area, thus reducing the abrupt 90 degree turn and increasing safety. Has this been considered?

Thank you to the Committee for considering this petition on a matter that has concerned this community since the bypass was opened in 2014. We welcome your input and hope things can be improved.

Yours sincerely,

V. Mitchell

Mrs. Vicky Mitchell
Clerk - Eglwyscummin Community Council.







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Ta

Doc Penfro
Pembroke D
A477
Dinbych - y - pysgod
Tenby
(A478)

(M4)
Sanclêr
St Clears
A477

Stop all foreign aid payments from the Welsh Government including to "Size of Wales"

Y Pwyllgor Deisebau | 22 Medi 2025
Petitions Committee | 22 September 2025

Reference: SR25/11930

Petition Number: P-06-1520

Petition title: Stop all foreign aid payments from the Welsh Government including to "Size of Wales"

Text of petition:

The Welsh Government has this year given £775,000 (up from £670,000 last year) to a Charity called Size of Wales, chaired by ex-First Minister Carwyn Jones. According to its annual report filed with the Charity Commission Size of Wales lists it spending to include:

- Securing indigenous land rights in Brazil & Kenya*
- Building 'ecosystem resilience' for orangutans in Indonesia*
- Promoting gender work in Kenya and Peru*
- Building a solar powered boat in Peru to enable Wampi people navigate the river*



1. Background

The petition calls on the Welsh Government to stop all foreign aid payments and provides examples of international development activity carried out by Size of Wales, a Welsh Government delivery partner.

“Foreign aid” and “international development” are distinct terms. The former relates to assistance provided, often in response to emergencies, while the latter generally relates to targeted funding by developed countries towards long-term programmes in disadvantaged and/or developing regions.

2. Welsh Government action

Responsibility for the Wales for Africa programme moved to the First Minister’s portfolio in 2024-25 from the Social Justice portfolio.

The First Minister’s responsibilities cover ‘International Relations including overseas network and Wales and Africa’.

However, the Cabinet Secretary for Social Justice, Trefnydd and Chief Whip has responded to the petition, advising that it was passed to her.

In the response, the Cabinet Secretary explains the use of the grant funding provided to Size of Wales by the Welsh Government and her view on how this contributes to the Government’s aims on global responsibility and climate change. More information is included in section 2.2 of this briefing.

2.1. Foreign aid

The Welsh Government has made financial and non-financial donations to emergency appeals launched in response to international developments, such as natural disasters and armed conflict. For example, in 2022 it donated £4 million to the Disasters Emergency Committee (DEC) Ukraine Humanitarian Appeal, as well as medical supplies, and £100,000 to the DEC Pakistan Floods Appeal. In 2023, it donated £300,000 to the 2023 DEC Türkiye and Syria Earthquake Appeal and has made two £100,000 donations to the DEC Appeal for the Middle East since the Hamas attacks of 7 October 2023.

2.2. International development

The Welsh Government's approach to international development relates to a key aim of its International Strategy, to establish Wales as a globally responsible nation, and in its long-standing Wales and Africa programme.

The Welsh Government's funding of the Wales and Africa programme began in 2013-14 and [Size of Wales](#) is one of the strategic partners funded to deliver related activity. Further detail is set out in the Welsh Government's [Wales and Africa action plan](#)

In response to the petition, the Cabinet Secretary for Social Justice states that the "bulk of grant funding to Size of Wales" has been on the Mbale tree planting programme in Uganda. The Cabinet Secretary's response says that, through "this project, Wales is supporting the delivery of the UN Sustainable Development Goals, to alleviate poverty for those most vulnerable to the effects of climate change".

The Welsh Government set out further detail on its view on the programme's [benefits to the people of Wales](#) in an FOI response in March 2024.

2.3. Size of Wales grant income

In June 2025, the Welsh Government [set out in an FOI](#) that it's provided £4,057,687 to Size of Wales for the Mbale tree planting programme since July 2015. It noted "10 years of records are available due to information retention policies".

However, on 13 August 2025, the Welsh Government issued a [For The Record blog](#) stating that funding for the tree planting programme "over the last 15 years is around £270,000 per annum".

The petition states that Size of Wales has received £775,000 from the Welsh Government "this year". However, the organisation's latest accounts [submitted to the Charity Commission](#) cover the 2023-24 financial year (submitted in January 2025).

[Size of Wales' 2023-24 Financial Statements](#) show grant income of £775,000 from the Welsh Government for the year, which it notes relates to the Education and Communication Programme and the Mbale Trees project in Mbale, Uganda.

In its 2023-24 Financial Statements, Size of Wales also shows grant income of £24,000 from “WG/WCVA”. Size of Wales notes:

Wales Council for Voluntary Action (WCVA), through the Welsh Government’s Wales and Africa Grant Scheme, have provided a grant towards advancing gender equality for climate change resilience and adaptation in Manafwa district, Eastern Uganda.

This would increase Size of Wales’ grant income from the Welsh Government in 2023-24 to £799,000.

2.4. Welsh Government budget allocations

The Welsh Government’s international development budget expenditure line (BEL) funds the delivery of the Wales and Africa action plan, including funding to Size of Wales.

This section explains the Welsh Government’s budget allocations for Size of Wales since 2023-24.

2023-24

During 2023-24 draft budget scrutiny, the former First Minister, Mark Drakeford MS, confirmed that a grant of £550,000 would be awarded to Size of Wales:

...primarily to deliver the Mbale Tree Planting Programme, with some funding allocated to the Bore Community Forest project in Kenya.

2024-25

The funding for the international development BEL decreased by 23.6 per cent in the 2024-25 Draft Budget compared to the 2023-24 Final Budget. Former First Minister, Vaughan Gething MS, said this would affect the Welsh Government’s ability to donate to any future DEC appeal, but specifically in relation to the humanitarian crisis in Gaza, and led to the cessation/pause of some Wales and Africa activity (which resumed in 2024).

The Draft Budget allocation for 2024-25 year for ‘Size of Wales/Mbale Tree Planting’ was £450,000.

2025-26

In June 2025, the First Minister confirmed that Size of Wales’ Budget allocation for the current 2025-26 year was £350,000.

3. Welsh Parliament action

The Culture, Communications, Welsh Language, Sport and International Relations Committee scrutinises the budget allocations for areas covered by this petition and is undertaking an inquiry into the [Welsh Government's International Strategy](#).

The responses to its [written consultation](#) as part of this inquiry included evidence from organisations regarding the Wales and Africa programme budget. In its response, [Size of Wales](#) said of international resourcing:

With current budget restrictions and the cost of living crisis, we are concerned that funding for this work may decrease in the new budget [...] Without sufficient resources, Wales risks falling short of its ambitions to be a globally responsible nation.

[Fair Trade Wales](#) described the resourcing of the Wales and Africa programme as “vitally important”.

[Welsh Overseas Agencies Group](#) identified communication and transparency around the programme as an area needing improvement. It said that:

limited updates and sporadic online engagement have constrained public engagement and awareness.

It also noted that:

a 10-year report on this programme is still awaited. Without such reports, it is difficult to measure the programme's impact and its alignment with the broader goals of the strategy.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.

Jane Hutt AS/MS
Ysgrifennydd y Cabinet dros Gyfiawnder Cymdeithasol, y
Trefnydd a'r Prif Chwip
Cabinet Secretary for Social Justice, Trefnydd and Chief Whip



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref JH-/00641/25

Carolyn Thomas MS
Chair - Petitions committee

22 July 2025

Dear Carolyn,

I am writing in response to your letter dated 4 July to the First Minister, Eluned Morgan MS, regarding the petition received by the Petitions Committee - Petition P-06-1520 Stop all foreign aid payments from the Welsh Government including to "Size of Wales". It has been passed to me to respond.

Size of Wales is a Welsh charity that works towards making Wales a part of the global solution to climate change. They work with communities worldwide to protect rainforests and plant trees to protect at least two million hectares of tropical forests – an area the size of Wales. They work with trusted partners around the world on vital work protecting forests. They also provide education to pupils in Wales about the need to take action on deforestation and climate change.

The bulk of grant funding to Size of Wales has been spent on the Mbale Tree Planting Programme in Uganda. As a globally responsible nation, we believe that supporting a programme that funds planting of trees on the equator, where growth rates are more than four times that of our own, brings benefit to the people of Wales as we attempt to fight the climate crisis. It is no longer possible for a country to determine its future alone. Climate change does not respect national boundaries, and we are supporting communities on the forefront of the climate crisis.

Through this project, Wales is supporting the delivery of the UN Sustainable Development Goals, to alleviate poverty for those most vulnerable to the effects of climate change. As of June 2025, the Mbale Tree Planting Programme (MTPP), through the planting of 25 million trees, has sequestered an estimated 1,434,819 tonnes of CO2 since the project began. As we contribute to the reduction of CO2 emissions, we help tackle the climate crisis, which is perhaps the biggest threat to humanity.

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[@gov.wales](https://twitter.com/Correspondence.Jane.Hutt)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

The MTPP demonstrates Wales' commitment to Climate Justice. Rural Ugandans have done very little to cause the climate change that is causing them so many problems – which include drought, flooding, and landslides. By supporting this Ugandan-led project, Wales is helping some of the very poorest people in the world adapt to climate change, secure their habitats from natural disasters and improve their livelihoods. The MTPP isn't just about planting trees; the programme builds safer, fuel-efficient stoves, advises on better agricultural techniques, distributes improved seeds for crops, supports 32 beekeeping groups which in the last year have produced 10,000kgs of honey and puts gender empowerment at the centre of their work.

Trees provide multiple benefits beyond absorbing carbon. They provide shade for vulnerable crops such as coffee, they provide shelter for homes during damaging storms, fruit to supplement poor diets, they fix nitrogen in the soil to improve crop yields and stabilise the soil to prevent landslides to which the region is prone.

The Welsh Government funding also contributes towards the education work that Size of Wales carries out across Wales. Each year, Size of Wales offer in-depth support to 12 schools, helping them to become Deforestation-Free Champion schools, which has a positive impact in the wider community. Pupils from a minimum of 100 schools also take part in workshop sessions. Size of Wales runs two YouthCOP events per year, one in north Wales and one in south Wales, for young people aged 9-14 to learn about the UN and its annual climate change conference.

The Welsh Government has also provided funding to Size of Wales to support their work with the Wampis Nation in the Peruvian Amazon. Following a meeting with Wampis at COP26, the then Minister for Climate Change agreed to provide funding to the Wampis Nation to support their goal of transitioning to 100% renewable energy. Indigenous technicians were trained in solar technology and they have constructed the first solar-powered boat in Peru. Our support has helped strengthen the Wampis Nation to protect their forest, culture and livelihoods.

The Wampis' territory covers over 1.3 million hectares of tropical forest and is extremely biodiverse with 98% of the forest remaining intact, despite pressures from illegal logging and gold mining and oil exploration. The significance of the Wampis' territory to climate protection in Peru and internationally is immense. A study estimated that the Wampis' forests store 145 million tonnes of carbon.

To conclude, Size of Wales receives donations from the public and from many different organisations in addition to funds from the Welsh Government. These other funders, along with the Welsh Government, have been instrumental in supporting a number of projects listed in the petition. I hope the above has helped to explain the use of Welsh Government funds.

Yours sincerely,



Jane Hutt AS/MS

Ysgrifennydd y Cabinet dros Gyfiawnder Cymdeithasol, y Trefnydd a'r Prif Chwip
Cabinet Secretary for Social Justice, Trefnydd and Chief Whip

10th September 2025

Dear Carolyn Thomas MS,

RE: Recent petition regarding "Stop all foreign aid payments from the Welsh Government including to "Size of Wales" (246525)

I am writing in response to Petition 246525, which calls on all funding for global solidarity projects to be ended, including the Mbale Tree Growing Programme.

As Director of Size of Wales, I believe it is important to offer clarity, provide context, and strongly express support for this internationally respected initiative that embodies Wales' commitment to climate justice, global responsibility, and environmental leadership.

Since 2013, the Welsh Government via the Wales and Africa programme has supported Size of Wales and our local partner, the Mount Elgon Tree Growing Enterprise (METGE) to implement the Mbale Tree Growing Programme in eastern Uganda.

Uganda has one of the highest rates of forest loss in the world. Between 2001 and 2020, the country lost [918,000 hectares of tree cover](#), a 12% decrease. Based on current trends, it risks losing its [entire forest cover by 2040](#). Mbale is a large mountainous area that has become heavily deforested primarily due to the expansion of agriculture; increasing demand for fuelwood and charcoal; and weak legal protections and enforcement of forest protection laws. The once predictable weather has become irregular and the local soils, destabilised by the reduction of trees and heavy rainfall, causes flooding and landslides. Landslides have resulted in a loss of homes, schools, livestock and sometimes cost lives.

This programme has supported a network of community-run nurseries in eastern Uganda that have distributed over 25 million trees to rural farmers and schools free of charge. Half of these nurseries are run by passionate and empowered women, such as Deborah Nabulobi who some of you might have met when she visited Wales back in March 2025, who are not only leading their communities but also advancing gender equality and sustainability.

This is not charity, it is climate action at scale. The trees planted through the programme have sequestered an estimated 1.4 million tonnes of CO₂, equivalent to 25% of Wales' annual transport emissions. This is a meaningful contribution to the global fight against climate change, arguably the greatest threat facing humanity.

Planting trees in the tropics, especially near the equator where they grow more than four times faster than in Wales, offers a powerful and efficient strategy for carbon capture. These trees sequester carbon more quickly and on a larger scale, making them a highly effective tool in global efforts to reduce atmospheric CO₂. As well as tackling climate change, trees protect local people in the Mount Elgon region from the effects of soil erosion, which can cause deadly landslides. The trees also help regulate the climate, provide local communities with

shelter, shade for crops, fresh fruit, nuts and animal fodder, sustainable wood, forage for bees to support local agriculture and are an important source of income.

The Office of National Statistics - Foreign Commonwealth Development Office (ONS – FCDO) with support from the Welsh Government (WG) used satellite imagery to carry out [research](#) to determine whether there has been a change in tree coverage in the Mbale Trees Programme area. The research found that forest cover is seven times higher within a 5km radius of the nurseries compared to surrounding areas. That clearly demonstrates the tangible environmental impact the programme is having thanks to supporting local leadership and puts into practice Wales' commitment to being a Globally responsible nation as outlined in the Wellbeing of Future Generations Act.

The Mbale Tree Growing Programme also demonstrates Wales' commitment to climate justice. Rural Ugandan communities, who have contributed very little to global emissions, are facing severe impacts of climate change, including drought, flooding, and landslides. By supporting this Ugandan-led initiative, Wales is helping some of the world's poorest people to adapt to climate change, improve their livelihoods through beekeeping and coffee growing, install fuel efficient stoves, and restore their ecosystems.

A powerful example of that is that trees grown by the programme are used as shade for coffee farmers such as Jenipher Sambazi – a Fairtrade coffee farmer and Vice Chair of MEACCE cooperative. The coffee that Jenipher and other farmers grow is now exported to Wales as [Jenipher's Coffi](#) demonstrating Wales' commitment to fairtrade and ethical labour rights.

It is important to clarify that in 2023-24, the Welsh Government contributed £550,000 to the Mbale programme and in 2025-26 the funding was reduced to £350,000. This is separate from the additional funding that Size of Wales receives for its climate education work within Wales (£225,000 for 2023-24 - also included in the figure quoted in the petition), which helps thousands of young people in primary and secondary schools across Wales learn about climate change, become responsible global citizens, and take informed action at a time of growing climate anxiety. Size of Wales offers bilingual sessions free of charge to schools and this work is highly valued by pupils and teachers. We engage in schools with a higher than average free school meals rate supporting children that may not have access to the same opportunities, addressing educational disparities and promoting equal opportunities.

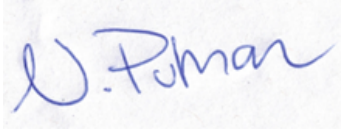
Furthermore, Size of Wales' work in Brazil, Kenya, Indonesia, and Peru are funded by other donors, such as the Welsh based charity, the Waterloo Foundation.

Beyond the carbon and environmental and social gains, the programme has created lasting and valuable connections between Wales and Uganda. Thousands of young people in Welsh schools have participated in climate education and exchange programmes, building solidarity, understanding, and purpose across continents.

In summary, the Mbale Tree Growing Programme is a deeply impactful, cost-effective, and global responsible initiative. It benefits both Wales and Uganda, while helping tackle the global climate crisis.

I hope this additional information helps inform the Committee when they review the arguments presented in the petition. Please do not hesitate to ask if you would like any further information about Size of Wales' work.

Yours sincerely,



Nicola Pulman
Director, Size of Wales

P-06-1520 Stop all foreign aid payments from the Welsh Government including to "Size of Wales" – Correspondence from the Petitioner to the Committee, 10 September 2025

Petitions Committee

Thank you for your e-mail and copies of the letter from Jane Hutt.

The fact that the Size of Wales and other charities/NGO's are doing good work in their eyes and helping to reduce the climate change scam does not in any way make up for what is in effect stealing money from the Welsh economy.

All these ridiculous schemes in foreign lands do nothing to help the people of Wales.

Does it help to give the struggling Welsh NHS better care for the sick No.

Does it help the children in Wales to get a better education No.

Does it help the people of Wales in any way at all the answer is always NO.

The Welsh Assembly has no mandate to be stealing Welsh taxpayers money to fund projects of this kind.

They hand money to charities because they can't fund these projects directly so it's a slight of hand close to money laundering and should be illegal.

They are there to represent and lead the people of Wales to the best future possible not to grandstand on the world stage to make themselves feel good.

There are reports from Uganda that they have located gold reserves worth 12.8 Trillion Dollars so they can afford to fund these programs themselves.

There are also reports of subsistence farmers being evicted from their land by the NGO's to plant trees sometimes violently.

Why is it that politicians always think that they can be philanthropic with other people's money never their own.

Taxpayers' money not Welsh Assembly money is what this is about as the Welsh Assembly has no money it all belongs to the taxpayers not the politicians

that think they can hand it out to other countries for no benefit to the hard-pressed taxpayers.

I am sure the Senedd will take no notice of this letter but hopefully they won't be there much longer and the new MSP will stop this misuse of taxpayers' money.

Yours sincerely

R Leggett

P-06-1531 Mandate Comprehensive and Specific Food Labelling to Support Dietary Needs and Allergies

Y Pwyllgor Deisebau | 22 Medi 2025
Petitions Committee | 22 September 2025

Reference: RS22/11624

Introduction

Petition Number: P-06-1531

Petition title: Mandate Comprehensive and Specific Food Labelling to Support Dietary Needs and Allergies

Text of petition: Imagine navigating daily life knowing that one wrong bite could jeopardise your health or the health of someone you love. For my son, and countless others worldwide, this is a constant reality. He has a severe allergy to potatoes—an ingredient that often hides behind vague terms like "starch" on food labels, and sometimes not labelled at all.

The lack of clear, specific labelling poses a serious risk. This is more than a matter of convenience; it's about safety and the right to make informed choices about what we consume. Every consumer deserves to know exactly what ingredients are in their food.

Empowering consumers with accurate information protects not only those with dietary restrictions but also fosters trust and accountability in the food industry.



Join us in advocating for change. Sign this petition to mandate detailed and specific food labelling. Together, we can create a safer and more inclusive food landscape for everyone.

The text provided above is submitted by the petitioner. The petitions team make every effort to ensure it preserves their authentic voice. This text has not been verified for accuracy, or errors, and may contain unverified opinions or assertions.

Mae'r testun uchod yn cael ei gyflwyno gan y deisebydd. Mae'r tîm deisebau yn gwneud pob ymdrech i sicrhau ei fod yn cadw ei lais dilys. Nid yw'r testun hwn wedi'i wirio am gywirdeb, neu wallau, a gall gynnwys barn neu honiadau heb eu gwirio.

1. Background

Legislative competence

Paragraph 80 of [Schedule 7A](#) to the Government of Wales Act 2006 provides that labelling of “food, food products and food contact materials” are within the competence of the Senedd.

Due to the [mutual recognition principle for goods](#) provided for in the Internal Market Act however, the Senedd would be unable to enforce its own food labelling requirements on goods lawfully produced and labelled in other parts of the UK. For this reason, any new requirements for food labelling made by the Senedd would apply only to goods produced in Wales and not those originating in other parts of the UK.

Current legislation on food labelling

Legislation on food labelling is largely derived from assimilated EU law, in particular [Regulation \(EU\) No 1169/2011](#), more commonly known as the Food Information to Consumers (FIC) Regulation. In Wales, these regulations are enforced by [The Food Information \(Wales\) Regulations 2014](#). The [Food Standards Agency](#) (FSA) is responsible for implementing these regulations and for providing advice to the Welsh Government on food safety and standards.

The regulations provide that all [prepacked food](#) and food [prepacked for direct sale](#) must list ingredients in descending order of weight using the legal name of the ingredient. Where a legal name is not available, a customary name must be used. Foods with legal names are those with certain properties defined in law (for example, [glucose syrup](#)). Customary names are those which are widely understood and accepted by consumers without the need for further explanation.

Where a legal name or customary name is not available, a descriptive name must be used which accurately describes the ingredient.

If any one of **fourteen major allergens** are present in the food, this must be clearly emphasised in the list of ingredients. This can be by a change in font or style, such as capitalising the allergen or using bold text. Allergens must be indicated using a customary name (for example, 'milk' added in brackets after 'whey' or 'casein'). If an allergen is part of a certain group, the specific variety must be named (for example, 'almonds' as opposed to 'nuts').

If an allergen is not one of the fourteen regulated allergens, it is not subject to these requirements. Since potatoes are not included in the list of regulated allergens, there is no legal requirement to declare if an ingredient has been derived from them.

Unclear food labelling

It may not always be clear to the consumer where an ingredient has come from if it does not belong to one of the fourteen regulated allergens. Some organisations, including [Allergy UK](#) and [BSACI](#), have highlighted unclear labelling of ingredients derived from certain legumes (particularly peas) as a growing problem. Legumes such as peas, beans, lentils and chickpeas have been **identified** as emerging allergens, with peas causing particularly severe reactions in those sensitive to them. As they are not one of the fourteen regulated allergens however, there is no legal requirement to specify if an ingredient has been derived from them. The generic term 'vegetable fibre' can be used in place of 'pea fibre,' for example.

There are also some exemptions to the general requirement for all ingredients to be listed in full. For example, there is no requirement to list individual components of herb or spice mixes that make up less than 2% of the finished product. These can be listed using generic terms such as 'herbs,' 'spices' or 'flavourings.' [Allergy UK](#) have highlighted the difficulty this can present to those with less common allergies—such as to chillies, garlic, tarragon or coriander—when trying to identify and avoid them.

2. Welsh Government action

In its response to this petition, the Welsh Government state that the fourteen regulated allergens were originally selected by European regulators based on the prevalence of allergic reactions to them and the likely severity of these reactions. While it is not a requirement to declare the presence of other allergens, it notes that food businesses may choose to do so.

The response acknowledges the difficulty which those who are sensitive to ingredients outside of the fourteen regulated allergens may have in identifying and avoiding those ingredients. It notes that the FSA is committed to reviewing regulations in response to emerging food safety concerns and consumer needs and that it routinely revises its allergen labelling guidance through expert evaluations and stakeholder consultations. As an example, it points to revisions made by the FSA in [March 2025](#) to its allergen labelling best practice guidance which followed research and feedback from stakeholders.

3. Welsh Parliament action

The Legislation, Justice and Constitution Committee held an evidence session on the [Food \(Wales\) Bill](#) on [30 January 2023](#). The Food (Wales) Bill was a Member Bill that set out a range of provisions relating to food, with the stated aim of creating a more sustainable food system in Wales. During the session Aled Evans, a legal adviser to the Senedd Commission, commented that proposals on food labelling were not included in the Bill due to concerns that the Internal Market Act would undermine their effectiveness in practice. The Bill was subsequently rejected by the Senedd on [24 May 2023](#).

While the Senedd has debated other issues relating to food labelling, such as [calorie labelling](#) and [country-of-origin labelling](#), it has not examined clearer labelling of ingredients.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.



Eich cyf/Your ref P-06-1531
Ein cyf/Our ref SM/00269/25

Carolyn Thomas MS
Chair
Petitions committee

petitions@senedd.wales

08 July 2025

Dear Carolyn,

Thank you for your letter about Petition P-06-1531 Mandate Comprehensive and Specific Food Labelling to Support Dietary Needs and Allergies.

Living with a food allergy or intolerance can place additional burdens on people and it is important they should have access to clear and accurate information.

The Food Standards Agency (FSA) is responsible for food safety, including allergen labelling, in England, Wales and Northern Ireland. The FSA in Wales and Northern Ireland are also responsible for general food labelling.

All food businesses are under a legal obligation to provide information about the presence of the 14 regulated allergens when they are used as ingredients in food. These were chosen based on their prevalence in causing allergic reactions and the likely severity of these reactions. The selection was informed by scientific research and clinical data. Potatoes are not one of the 14 regulated allergens and, even when they are included in foods as "starches", their presence is not required to be declared. Food businesses can, however, voluntarily provide this information.

The FSA recognises that for people sensitive to ingredients not included in this list of 14 regulated allergens, it is harder to identify and to avoid such foods. It routinely revises its allergen labelling guidance through expert evaluations and stakeholder consultations. For example, revisions to allergen labelling best practices were made in March 2025, incorporating feedback from stakeholders and refining precautionary allergen labelling approaches. These updates reflect the FSA's commitment to reviewing allergen labelling regulations in response to emerging food safety concerns and consumer needs.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Yours sincerely,

A handwritten signature in black ink that reads "S. Murphy". The signature is written in a cursive style with a large initial "S" and a long, sweeping underline for the "y".

Sarah Murphy AS/MS

Y Gweinidog Iechyd Meddwl a Llesiant
Minister for Mental Health and Wellbeing

P-06-1531 Mandate Comprehensive and Specific Food Labelling to Support Dietary Needs and Allergies – Correspondence from the Petitioner to the Committee, 15 September 2025

Dear all,

Thank you very much for taking the time to consider my petition.

Life can be very difficult when your child has a life-threatening allergy, and this is made even harder when ingredients are not always labelled correctly. This is not only the case for my son, [REDACTED], but for many others living with serious allergies that fall outside of the top 14 allergens.

I strongly believe there should be clearer and more consistent labelling of food — not just for [REDACTED], but for the many families across Wales who face the same challenges every day.

Thank you again for your time and consideration.

Kind regards,

Jessica Davies

Introduce inflation cap to all Local Authority council tax increases in Wales

Y Pwyllgor Deisebau | 22 Medi 2025
Petitions Committee | 22 September 2025

Reference: SR2511930-5

Petition Number: P-06-1536

Petition title: Introduce inflation cap to all Local Authority council tax increases in Wales

Text of petition: Local Authorities routinely apply above inflation increases to council tax rates whilst reducing services, often to fill shortfalls in Welsh Government settlements, which is unfair on working families. This puts unsustainable pressure on household budgets, increasing child poverty (Programme for Government priority).

Limiting increases to inflation would alleviate unsustainable pressure on household budgets whilst allowing fair inflation linked increases to local authority council tax revenues

1. Background

The majority of local government funding comes via Aggregated External Finance (AEF), which is comprised of the Welsh Government's Revenue Support Grant (RSG) and redistributed Non-Domestic Rates (NDR). The Final Local Government

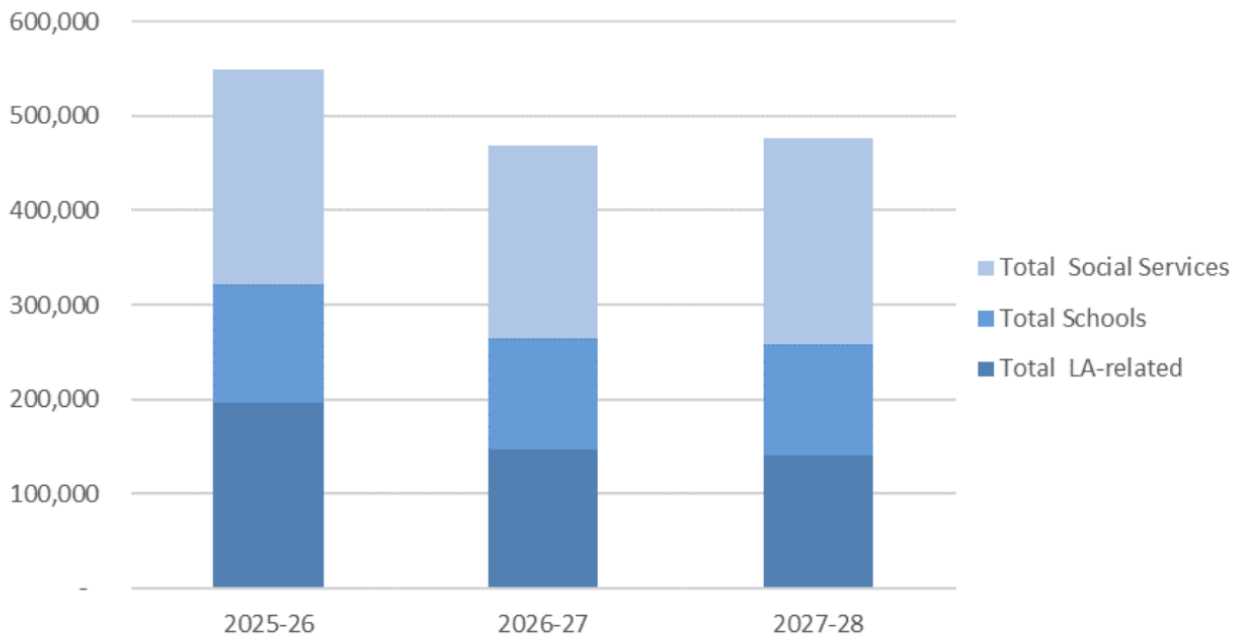


Settlement 2025-26 allocated £6.14 billion in core revenue funding and non-domestic rates (business rates) to the 22 local authorities in Wales. The Welsh Government also allocated £1.37 billion in specific grant revenue funding, and over £1 billion in capital.

Local authorities also raise a significant amount of funding themselves to support the delivery of local services. The most significant element of this is council tax, but there are also a number of other income streams for local authorities, such as discretionary charges for leisure services, parking and trade waste for example.

The Welsh Local Government Association (WLGA), in its **written evidence on the Welsh Government’s Draft Budget 2025-26**, estimated funding pressures in excess of £550 million for Welsh local authorities for 2025-26. The WLGA illustrated in its evidence the budget pressures, by type, faced by local authorities over the three years to 2027-28:

Budget pressures by type, 2025-26 to 2027-28, £000



Source: SWT Survey 2024

2. Average council tax increases

According to **data on council tax levels for 2025-26**, the total **budget requirement** for local authorities for the 2025-26 financial year is £9.4 billion, of which £2.8 billion (30%) is income from council tax.

Council Tax is made up of two core elements, the amount collected by the local authority to run its services, and the amount collected for the police element. Some areas will also collect a precept on behalf of a community and town council.

Average band D council tax in Wales for 2025-26 is £2,170. This includes £1,747 for county councils, £374 for police and £50 for community councils.

For the local authority element of council tax, band D increased by an average of £119 (7.1%) over the previous year. In 2024-25, the average increase was £122 (7.8%). Police increases averaged 7.5% (£26) for 2025-26. The last three financial years have seen some of the highest combined increases in average band D rates for several years.

In a blog post on *Thinking Wales – Meddwl Cymru*, Guto Ifan of the Wales Governance Centre notes that Council Tax has been utilised in Wales to offset austerity and plug gaps in police funding. However, he also states that Council Tax “continues to rise well above inflation” and that Wales is an outlier in the UK:

Since devolution in 1999, Welsh council tax bills have effectively tripled in nominal terms. Wales has averaged annual increases of 5%, compared with 4% in England and just 2% in Scotland.

3. Inflation measures

The rate of inflation is the change in prices for goods and services over time. Measures of inflation and prices include consumer price inflation, producer price inflation and the House Price Index.

The three key inflationary measures in the UK are the **Consumer Prices Index (CPI)**, **Consumer Prices Index with Housing (CPIH)** and the **Retail Prices Index (RPI)**.

There are key differences to them all:

- **CPI:** The UK government's main measure of inflation used to adjust benefits and the state pension. It measures the prices of goods and services purchased by households, reflecting the cost of living for consumers.
- **CPIH:** Is the same as CPI, but also includes the costs associated with owning or maintaining a home, such as mortgage interest rates and council tax.
- **RPI:** An older measure, still used for some contracts like rail fares, student loans, and index-linked gilts. It reflects the average change in the price of

goods and services. It also includes owner occupier housing costs. However, it no longer meets the required standard for designation as an accredited official statistic.

According to the Office of National Statistics (ONS) CPI rose by 2.6% in the 12 months to March 2025, while CPIH rose by 3.4% in the same period. The annual RPI inflation rate was 3.2% in March 2025.

4. Council tax limits and the legislative framework

The Welsh Ministers currently have powers to limit (cap) excessive increases in the budget requirement of local authorities in Wales. However, the Cabinet Secretary for Finance and Welsh Language, Mark Drakeford MS noted in a response to a similar petition in February 2025 that “the Welsh Government has respected the autonomy of local government and has not sought to cap or limit council tax in Wales since devolution”.

The Cabinet Secretary’s response at the time goes on to state that the:

Welsh Government channels as much of the available funding as possible into the unhypothecated Local Government Settlement so that local authorities have greater flexibility in allocating funding according to local priorities.

4.1. Legislative framework to limit excessive increases

The relevant legislation is the Local Government Finance Act 1992 (“the LGFA 1992”).

Section 52B of the LGFA 1992 gives Welsh Ministers the power to take action against a local authority if they consider that the budget requirement set out by the local authority for the upcoming year is ‘excessive’.

A “budget requirement” is the amount equal to how much the local authority’s expected spending (i.e. expenditure incurred during the year in performing its functions, grant monies that will have to be repaid to Welsh Ministers, allocation of funds to financial reserves and contingencies) exceeds its expected income (i.e. monies which the authority expects to receive that year, subject to certain exceptions).

Section 52B provides that Welsh Ministers must produce a set of principles that will be used to determine whether the budget requirement is excessive. It also provides that these principles must (as a minimum) contain a comparison of the budget requirement for the year under consideration with that of an earlier year.

Section 52C provides that the Welsh Ministers may publish a report which sets a “notional amount” for a local authority’s budget requirement, to be used as the basis of any comparison between the year under consideration and any previous year. Notional amounts may be set by the Welsh Ministers in certain circumstances such as where there has been a change in function or boundary – thereby allowing a valid comparison can be made with the budget requirement for the year under consideration. It may also be used to set a notional amount where there was no budget requirement set for an earlier year.

Following determination using the principles required by section 52B, if the Welsh Ministers are of the opinion that the amount calculated by an authority as its budget requirement for the year is excessive, section 52D enables the Welsh Ministers to “designate” or “nominate” the local authority in question.

4.2. Designated Local Authorities

Section 52E provides that if a local authority is *designated*, the Welsh Ministers must notify the authority of the amount which they propose should be the maximum amount calculated by the local authority as its budget requirement for the year, and set out the maximum amount which the Welsh Ministers propose the authority could calculate as its budget requirement for the year without the amount calculated being excessive.

The local authority can then either:

- accept the designated maximum amount provided by the Welsh Ministers; or
- under section 52F, to challenge the decision of the Welsh Ministers.

If an unsuccessful challenge to the maximum amount is made by the local authority, the Welsh Ministers are able to issue an order to the local authority to ensure that the authority complies.

4.3. Nominated Local Authorities

Section 52L provides that if a local authority is *nominated*, the Welsh Ministers must notify the authority of the amount which they would have proposed as the target amount of budget requirement for the year under consideration if they had *designated* the authority.

After a local authority has been nominated, the Welsh Ministers can decide whether to:

- *designate* the authority; or
- determine an amount that they propose should be the notional amount calculated by the authority as its budget requirement for the year.

If the local authority receives notification from the Welsh Ministers of a proposed amount, the authority has 21 days to either:

- accept the amount proposed by the Welsh Ministers; or
- challenge the proposed amount and request that the Welsh Ministers reconsider their determination.

If the amount proposed is challenged by the local authority and the reasons given for the challenge are agreed with, the Welsh Ministers may reconsider their decision.

4.4. Interpretation of the legislation

While the provisions in Chapter IVA of the LGFA 1992 do not specifically mention council tax, the title of the chapter which they fall under is called “Limitation of Council Tax and Precepts”. A House of Commons Briefing Paper on Council tax capping published in 2004 (specifically Chapter III) provides some background as to why this section of the legislation provides Ministers with the power to cap council tax.

Welsh Ministers have in the past outlined how they might be prepared to use the powers available to limit increases in council tax if these were deemed excessive. For example, in her statement on the Provisional Local Government Settlement for 2014-15 (16 October 2013), the then Minister for Local Government (Lesley Griffiths MS), said:

In enabling Local Authorities to make local decisions about council tax, I am offering them flexibilities in managing their budgets which are not

available to their counterparts in England where restrictive freezes apply. However, I have made it very clear I am prepared to use capping powers available to me in the event of excessive increases.

A similar statement was made in 2015 by the then Minister for Public Services, Leighton Andrews AM, stating in his [letter accompanying the Final Local Government Settlement 2015-16](#):

I am prepared to use the capping powers available to me should I consider any proposed increase in council tax to be excessive. I also expect every authority to take account of all the available funding streams in considering service provision and setting its budget and Council Tax.

Despite this, in his response to the petition, the Cabinet Secretary for Finance and Welsh Language states that the Welsh Government “has respected the democratic responsibility of local authorities and has not used powers to cap council tax in Wales since devolution”. He continues by noting that:

The responsibility for setting a local authority’s annual budget and as part of that, decisions about council tax, are matters for each local authority and its elected members...

Limiting council tax increases to an arbitrary percentage becomes a target for local authorities to raise council tax to the maximum allowed rather than carefully considering what is necessary.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.



Ein cyf/Our ref MDFWL/00359/25

Carolyn Thomas MS
Chair - Petitions committee
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21 July 2025

Dear Carolyn,

Thank you for writing ahead of the Petitions Committee's initial consideration of the petition P-06-1536, "Local Authorities routinely apply above inflation increases to council tax rates whilst reducing services, often to fill shortfalls in Welsh Government settlements, which is unfair on working families. This puts unsustainable pressure on household budgets, increasing child poverty (Programme for Government priority). Limiting increases to inflation would alleviate unsustainable pressure on household budgets whilst allowing fair inflation linked increases to local authority council tax revenue". I welcome the opportunity to set out the Welsh Government's views.

The responsibility for setting a local authority's annual budget and as part of that, decisions about council tax, are matters for each local authority and its elected members. Each local authority in Wales has the democratic freedom to set its own council tax to meet local needs and priorities, which means they are accountable to the local electorate for the decisions they make. While any increase in council tax may be unwelcome to local taxpayers, the tax provides a significant source of funding for essential local services upon which people rely every day, such as schools and social care. There is a range of support in place to help people who are finding it difficult to pay their council tax bills. For example, we provide £244 million every year to support local authorities in delivering the Council Tax Reduction Scheme, which supports around 260,000 low-income households in Wales.

The Welsh Government has respected the democratic responsibility of local authorities and has not used powers to cap council tax in Wales since devolution. The [Strategic Partnership Agreement](#) between the Welsh Government and local government in Wales launched in June, recognises that pressures on households should be managed as much as is possible within the broad spending envelope available and the choices to be made on services.

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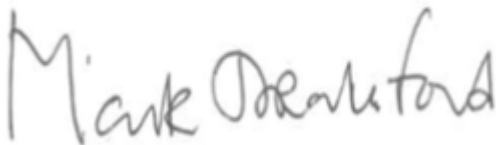
We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Local authorities are therefore responsible for balancing the provision of essential services with managing the financial demands on households, especially given ongoing cost-of-living challenges. While the Local Government Settlement is the largest single source of funding available to authorities, it is not the only one. In setting budgets and council tax levels, we expect every authority to take account of all the available funding streams, and to consider how to secure best value for Welsh taxpayers through effective and efficient service provision. We offer considerable flexibility to authorities to exercise autonomy and responsibility in managing their finances. Limiting council tax increases to an arbitrary percentage becomes a target for local authorities to raise council tax to the maximum allowed rather than carefully considering what is necessary.

The Welsh Government is implementing its Programme for Government (2021-2026) commitment to a fairer council tax by improving the existing council tax system in Wales and updates can be found of those developments through our [webpage](#). Achieving a fairer council tax is one action the Welsh Government can take towards making Wales a more equal nation.

I hope this information assists the Committee's consideration of the petition.

Yours sincerely,

A handwritten signature in black ink that reads "Mark Drakeford". The signature is written in a cursive, slightly slanted style.

Mark Drakeford AS/MS

Ysgrifennydd y Cabinet dros Gyllid a'r Gymraeg
Cabinet Secretary for Finance and Welsh Language

Use English before (or instead of) Welsh

Y Pwyllgor Deisebau | 22 Medi 2025

Petitions Committee | 22 September 2025

Reference: SR25/11930-11

Introduction

Petition Number: P-06-1539

Petition title: Use English before (or instead of) Welsh

Text of petition: The 2021 census results show that around 80% of people in Wales can not speak Welsh.

Yet important information is given only in Welsh, examples include:

- Billboard public service information only in Welsh,
- Variable message road signs only in Welsh,
- NHS TV adverts on English TV channels in Welsh,
- Welsh options first in public service phonecalls.

Prioritising the language that 80% of the country can't understand in these cases is dangerous. English should be prioritised for safety.

The text provided above is submitted by the petitioner. The petitions team make every effort to ensure it preserves their authentic voice. This text has not been verified for accuracy, or errors, and may contain unverified opinions or assertions.

Mae'r testun uchod yn cael ei gyflwyno gan y deisebydd. Mae'r tîm deisebau yn gwneud pob ymdrech i sicrhau ei fod yn cadw ei lais dilys. Nid yw'r testun hwn wedi'i wirio am gywirdeb, neu wallau, a gall gynnwys barn neu honiadau heb eu gwirio.



1. Background

1.1. Legislative framework

The [Welsh Language \(Wales\) Measure 2011](#) modernised the legal framework regarding the use of Welsh in the delivery of public services. It included provisions with regard the official status of the Welsh language in Wales, and established the office of the Welsh Language Commissioner to promote and facilitate the use of the language.

The 2011 Measure also established a regulatory framework for the imposition of Welsh language standards (Welsh language duties) on public bodies and certain private sector organisations that deliver services in Wales. Examples of businesses that may be required to comply with some duties include utility companies, postal services, telecommunication companies and public transport providers. However, the provisions in the Measure do not extend to other businesses, such as supermarkets, banks and online retailers for example. Private companies undertaking work or delivering services on behalf of a public body (under an agreement or contract) may be required to comply with some Welsh language duties.

1.2. Official Status

The legislation provides for the official status of the Welsh language in Wales. It is given legal effect by enactments about, for example, the treatment of the Welsh language on the basis of equality (that is that it shouldn't be treated less favourably than the English language), and through duties placed on bodies to use the Welsh language, and the rights for individuals that arise from enforcing those duties.

The legislation does not, however, affect the status of the English language in Wales. But as the Cabinet Secretary points out in his response to the petition, "there is nothing to prevent a body from providing information or services in Welsh only, or bilingually".

1.3. Public bodies

Most public organisations in Wales, and many UK wide organisations that provide public services in Wales, have to provide Welsh language services to the public. Some organisations still operate *Welsh language schemes* under provisions in the [Welsh Language Act 1993](#), while others operate in accordance with the Welsh Language Standards – specific duties that a public body must comply with.

Failure to comply with the Welsh language standards could lead to enforcement action by the Welsh Language Commissioner, which could include, among others:

- requiring an organisation to prepare an action plan or take specific steps to prevent the continuation or repetition of the failure;
- publicising an organisation's failure to comply with the standards;
- impose a civil penalty on the organisation up to a maximum of £5000;
- seek to enter into a settlement agreement with the organisation.

Currently, 131 organisations are subject to Welsh Language Standards, including local authorities, police forces and health service bodies. The Welsh Ministers are also subject to the Standards.

1.4. Welsh Language Standards

Welsh Language Standards are duties imposed on organisations by the Commissioner. The standards seek to ensure that organisations treat and use the Welsh language equally with English language provision in different scenarios, such as: when the public contact the organisation, in the provision of online services and providing services internally to staff. There are five areas or classes of standards:

- Service delivery standards
- Policy making standards
- Operational standards
- Promotion standards, and
- Record keeping standards

While many of the duties will be similar across organisations, some will be tailored specifically for a particular organisation or sector. You can view the [Compliance Notices for every organisation on the Commissioner's website](#). The Compliance Notice sets out each individual standard that the organisation must comply with and the date it is required to comply.

As a general principle, the standards seek to ensure parity for the Welsh and English languages, such as ensuring that signs are bilingual, or that the Welsh and English are erected side by side in the same font and size. However, some

standards, for instance, require that the Welsh language text must be positioned so that it is likely to be read first, or that an announcement is in Welsh first.

Codes of Practice published by the Commissioner for local authorities, the Welsh Ministers and National Parks for example set out practical guidance in relation to the specific standards that have to be met. Whilst the Code is a statutory document, it states that it “should not be considered complete nor authoritative declaration of the law”. Nevertheless, under 3.51, it provides a question and answer in relation to Welsh only material and provision:

If a standard states that a service must be provided or that material must be produced 'in Welsh', does that mean it must be provided in Welsh only and that material must be produced in Welsh first?

- No, but the standards do not prevent that either. The requirements of the standards only impose duties in relation to providing services in Welsh. They do not impose duties in relation to providing services in other languages and this is therefore a matter for the body.

It continues by noting that the regulations' explanatory notes (within the Welsh Language Standards (No.1) Regulations 2015) state:

“Where a standard specified in these Regulations requires written material to be displayed or provided in Welsh, or for a service to be provided in Welsh, this does not mean that the material must be displayed or provided in Welsh only, or that the service must only be provided in Welsh (unless that is specifically stated).”

1.5. Welsh Language Commissioner

The Welsh Language Commissioner's principal aim, as set out in the 2011 Measure, is to promote and facilitate the use of the Welsh language. In the exercise of their functions, the Commissioner works towards increasing the use of the Welsh language in the provision of services and other opportunities for people to use the language.

The 2011 Measure also allows the Commissioner to impose and enforce Welsh language duties on organisations named in the Measure, encourage and share good practice, give advice and recommendations to the Welsh Ministers and carry out statutory enquiries.

The Commissioner is independent of Welsh Government, but receives its funding directly from it.

1.6. Statistics

On Census Day 2021, an estimated 538,300 usual residents in Wales (aged 3+) reported that they could speak Welsh. This equates to **17.8%** of the population. This is 1.2 percentage points lower than that recorded in the 2011 Census.

Other data on Welsh language ability and usage is collected via other surveys, such as the National Survey for Wales, the Annual Population Survey (APS) and the Welsh language use survey.

Both the National Survey for Wales and the APS show significantly higher numbers of Welsh speakers in Wales compared to the Census. For example, the National Survey for Wales estimates that some **34%** of the population can speak Welsh (18% can speak Welsh, while 16% had some Welsh speaking ability), while the APS has recently reported that **26.9%** of the population, year ending March 2025, can speak Welsh.

The Welsh Government and the Office of National Statistics has developed a joint work plan to improve understanding of the main survey and administrative data sources used to produce statistics about the Welsh language.

2. Welsh Government action

Whilst it is the responsibility of the Welsh Language Commissioner to impose and ensure compliance with Welsh language standards, it is the Welsh Government that is responsible for developing draft regulations for the Senedd to consider and approve.

Once regulations have been approved, the Commissioner will then draft Compliance Notices for all organisations covered by the regulations and consult with them, before issuing final notices.

The Welsh Government notes in its response to the petition that, “unless the standards provides otherwise, there is nothing to prevent a body from providing information or services in Welsh only, or bilingually” in Welsh and English.

The Welsh Government also points out that, in relation to safety concerns, Wales is not “unique” in terms of its bilingual status, and that bilingual signs and services are:

considered the norm in several European countries with no known evidence to suggest an increase in road accidents in those countries.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.



Ein cyf/Our ref MDFWL/00371/25

Carolyn Thomas MS
Chair - Petitions committee
Senedd Cymru
Cardiff Bay
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CF99 1SN

28 July 2025

Dear Carolyn,

Thank you for your correspondence as chair of the Petitions Committee regarding petition P-06-1539 which relates to the use of English before (or instead of) Welsh in important public messaging in Wales.

Wales is a bilingual nation and we are committed to ensuring that people can access services in Welsh should they prefer. Welsh Government's *Cymraeg 2050* strategy focuses on increasing the number of speakers, encouraging everyday use of Welsh, and creating supportive conditions for the language to thrive across all areas of life.

The Welsh Language (Wales) Measure 2011 ('Measure') provides official status to the Welsh language in Wales, and introduces a system of Welsh language duties, the Welsh Language Standards ('standards'), on public bodies. The aim of standards is to promote and facilitate the use of the Welsh language and to ensure that it is not treated less favourably than the English language. Standards make provision in relation to the Welsh language only; they do not make provision for any other languages, including English. Unless a standard provides otherwise, there is nothing to prevent a body from providing information or services in Welsh only or bilingually - that is, in English as well as Welsh.

In addition to the general principles set under the Measure, several of the standards impose a specific requirement not to treat the Welsh language less favourably than English, with some standards, relating to signs for example, imposing a specific requirement to place Welsh text so that it is likely to be read first. This may mean placing Welsh text to the left or above the corresponding English text. This is not intended to disadvantage those who do not speak or understand Welsh. Rather, the intention is to support and encourage those who understand Welsh or are learning the language to use it. Placing English text before Welsh text would likely mean that people are not going to read or hear Welsh.

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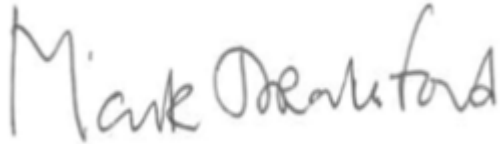
Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

In relation to safety concerns, it is important to note that Wales is not unique in its bilingual status. Bilingual services and signs are considered the norm in several European countries, with no known evidence to suggest an increase in road accidents in those countries, for example.

I trust this response will be of assistance as you formally consider the petition in question.

Yours sincerely,

A handwritten signature in black ink that reads "Mark Drakeford". The signature is written in a cursive, slightly slanted style.

Mark Drakeford AS/MS

Ysgrifennydd y Cabinet dros Gyllid a'r Gymraeg
Cabinet Secretary for Finance and Welsh Language

Response to the Petitions Committee – Petition P-06-1539

Dear Carolyn,

Thank you for inviting my comments ahead of the Committee's consideration of petition P-06-1539. I appreciate the response from the First Minister and wish to highlight the following points.

The letter sets out the legal framework of the Welsh Language (Wales) Measure 2011 and the aim of the Welsh Language Standards to ensure Welsh is not treated less favourably than English. I recognise the cultural importance of this, but the response does not address the petition's central concern: the safety and accessibility risks that arise when English is not prioritised in important public messaging.

The 2021 Census shows that around 80% of people in Wales cannot speak Welsh. Yet examples such as billboards, variable message road signs, NHS TV adverts, and public service phonelines demonstrate cases where Welsh is placed before, or instead of, English. In urgent or time-sensitive situations, this risks confusion, delay, or exclusion for the majority. Comparisons with bilingual signage in other European countries do not address the specific issue of safety-critical communications.

The First Minister notes that “there is nothing to prevent a body from providing information or services in Welsh only.” However, English is the primary language in Wales, and this approach has the effect of treating English less favourably than Welsh. Instead of protecting both languages equally, the standards risk creating the perception that there is no right to speak or receive services in English, despite it being the main language for most residents.

I therefore respectfully ask the Committee to consider: - Has research been undertaken into comprehension and response times to urgent messages when Welsh is shown first? - If not, will the Government commit to commissioning such research? - What safeguards exist to ensure that urgent public information reaches all residents quickly and clearly?

This petition is not about diminishing Welsh, but about ensuring safety, accessibility, and inclusion. In situations where comprehension and speed are critical, English should be prioritised to reflect the reality that it is the main language of daily life for the vast majority of people in Wales.

Thank you for your continued consideration of this matter.

Yours sincerely, C. Thorpe

Agenda Item 5.1

P-06-1258 Make individuals in Wales with Hidden disabilities eligible for the Blue Badge

This petition was submitted by Non Angharad Williams, having collected a total of 86 signatures.

Text of Petition:

Living with a Chronic illness on a daily basis and could be of a benefit of having a Blue badge Card due to needing a quick, easy parking spot when in need of a toilet urgently.

Additional Information:

Individuals with Hidden disabilities such as Crohn's and Colitis should be supported in having easy, quick accessible parking spots such as disabled parking as needing the toilet urgently.

Senedd Constituency and Region

- Dwyfor Meirionnydd
- Mid and West Wales

Agenda Item 5.2

P-06-1380 Make Blue badge Applications Lifelong for individuals who have a lifelong diagnosis

This petition was submitted by STAND NW CIC, having collected a total of 1,618 signatures.

Text of Petition:

Not all disabilities are the same, some are life long, meaning they do not change over time.

Unfortunately, current guidelines require individuals with lifelong diagnoses, which include learning disabilities or profound and complex needs, to reapply for a blue badge every three years. This process can be very frustrating and time consuming for both individuals and their caregivers and focus heavily on the negative aspects of an individual's abilities.

Additional Information:

The Equality Act 2010, states, a disability is a physical or mental condition that has a substantial and long-term impact on a person's ability to do normal day-to-day activities, it states it allows for the better or more favourable treatment of people with impairments based on the evidence given, to provide equality of opportunity.

We believe that the process should be updated to better support those with disabilities by making life easier for those with lifelong conditions.

We are therefore proposing a change, we are calling for the Welsh Government to change their current process when applying for blue badges, to give what's right and to support disabled people.

The change would be, that if a person applies for a blue badge due to a lifelong medical condition that is not expected to change, and their supporting health notes confirm this, then a blue badge should be granted for their lifetime.

Senedd Constituency and Region

- Vale of Clwyd
- North Wales



Eich cyf/Your ref P-06-1380
Ein cyf/Our ref KSNWT/01073/25

Carolyn Thomas MS
Chair - Petitions committee

09 July 2025

Dear Carolyn,

Thank you for your letter of 27 June regarding Petition P-06-1380 Make Blue badge Applications Lifelong for individuals who have a lifelong diagnosis.

There was a commitment for officials to collaborate with local authorities to make improvements that were raised from the petition, in addition to considering the recommendations from ongoing research which was undertaken from 2023-2025. Can I firstly assure you that officials continue to work on the matters outlined from the petition, together with the published review of the Blue Badge Scheme on the 21 May 2025. Please be assured that this remains an ongoing priority for the blue badge team alongside other key policy work.

The Written Statement I made on the 21 May 2025 was specifically intended to respond to the published report by the Welsh Government's Internal Research Programme's Knowledge and Analytical Services directorate, which they published the same day.

We continue to move things forward, but this work will take time. I am fully committed to advancing this important work and appreciate its significance. However, due to the complexity involved, it will require careful attention and time to achieve the best outcomes. I kindly ask for your patience and understanding as we allow the team the necessary space to focus on delivering meaningful progress. A Blue Badge Workgroup meeting which is a forum whereby local authorities can share best practice with Welsh Government (WG) took place on the 12 June 2025 with stakeholders that have been part of this group since 2019.

I fully appreciate that there is a wish for STAND North Wales to contribute and be involved with the improvements and this will be the case with certain aspects of actions we need to progress. Officials have already shared some of the lived experiences to get an understanding of the key points and once some initial work has been completed, they will be invited to participate.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

The meeting in June covered several updates and further emphasis was placed on raising the profile of things like consistency, streamlining applications and why complex cases should be referred to the Independent Advisory Service. Also, how some applicants may struggle to apply online and how we need to establish good practice across local authorities in terms of what information and help should be offered. To move this last point forward, officials have asked some of the local authorities to join a focus group, which the Welsh Local Government Association (WLGA) will be taking forward with WG. The aim will be for this to be arranged and convened and the concerns your petition has already raised will be considered. I understand the WLGA intend to engage with STAND North organisation after some initial work has been undertaken.

Streamlining applications and relevant guidance for local authorities and using the Blue Badge Digital System to record Not for Reassessment (NfR) has progressed. Following the workgroup meeting in June, two shorter sessions are currently being arranged for later this month. An expectation is for all local authority staff involved with the Blue Badge Scheme to attend one of these sessions. These sessions will cover additional guidance, working with health care professionals from the workgroup and the Independent Advisory Service. We want to ensure there is clear understanding of how some applications that are further assessed or who apply under the automatic criteria may also be assessed as not for re-assessment when the applicant reapplies, meaning they will have a streamlined route. I trust you will appreciate this will be looked at individually by the local authorities and WG or Ministers, cannot get involved with individual applications that are not determined by a local authority, as not for reassessment.

It would be extremely beneficial, if the petitioner and one other person with lived experience of the issues about having to re-apply could join a very short part of this meeting. I have asked officials to make contact with the petitioner to provide them with the relevant meeting information and hope that they are able to provide their valuable feedback. The aim is to complete some guidance on NfR for local authorities and for this to be implemented from the 17th of July 2025.

Following this my officials will be prioritising work and trying to move things forward and we will update the Committee and relevant stakeholders periodically when possible.

I very much value the commitment the petitioners and the Committee have already made to outline concerns and experiences. I would like to thank everyone for their future involvement with seeking improvements as we take forward agreed actions and recommendations from both the research and the petition. However, we need to be realistic and say some of this work will take time and will extend into next year. I hope both the Committee and the petitioner can bear this in mind and understand although, I appreciate the eagerness to see changes considered and put into practice. The immediate priorities include streamlining applications, applying not-for-reassessment measures, enhancing support for applicants and a procurement of a new contract for the Independent Advisory Service. We have also been approached by other groups keen to contribute, and we remain committed to fostering collaborative, continuous improvement.

I hope this helps answer the queries and I look forward to the petitioners being able to contribute to the sessions outlined above.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ken', enclosed in a thin black rectangular border.

Ken Skates AS/MS

Ysgrifennydd y Cabinet dros Drafnidiaeth a Gogledd Cymru
Cabinet Secretary for Transport and North Wales

P-06-1380 Make Blue badge Applications Lifelong for individuals who have a lifelong diagnosis - Correspondence from the Petitioner to the Committee, 15 September 2025

We are submitting our survey findings as supporting information. In addition we have shared our communications with Ken Skates MS and Jane Hutt MS. We have attached Ken Skates' response, along with a few replies from parents who responded to his statement.

We remain concerned about the continued focus on 'mobility' and lack of acknowledgement of other Blue Badge eligibility criteria, particularly for individuals with severe cognitive impairments and other hidden disabilities, many of which are life-long who could benefit from a Blue Badge, but are often overlooked under the current system.

The survey includes a selection of statements from participants who shared their personal experiences. These represent only a small portion of the responses we received. I would be happy to provide all responses upon request.

Our petition has been under discussion with the Petitions Committee for almost two years. During this time, we have actively consulted with people across Wales, including individuals with lived experience, carers, professionals, and those involved in the Blue Badge application process. We have also received support from several Members of the Senedd.

In light of the ongoing concerns raised through our survey, letters, and direct engagement, we respectfully request that our petition now be escalated for further consideration.

While we acknowledge that, according to Ken Skates MS, some measures have been implemented in response to previous recommendations, we, as petitioners, strongly feel that these actions are not sufficient

Please see attached

Many thanks



Ein cyf/Our ref KSNWT/01163/25

Julie Meese
STAND North Wales CIC
Community, Engagement and Participation Officer - Conwy and Denbighshire

Julie@standnw.org

05 September 2025

Dear Julie,

Thank you for your emails of 14 and 24 July regarding Petition P-06-1380 Make Blue Badge Applications Lifelong for Individuals with a Lifelong Diagnosis. This letter is also in response to your email of 18 August to the Cabinet Secretary for Social Justice, Trefnydd and Chief Whip.

I am grateful to you and your fellow petitioners for your feedback. Firstly, I want to reassure you that wording does indeed matter and we are doing all that we can to make the Blue Badge Scheme more efficient, effective and supportive for people with severe mobility challenges in Wales.

I fully understand your concerns and your continued efforts to pursue the proposals set out in your petition. However, we have confirmed the Welsh Government's position via previous correspondence with both yourself and the petitions committee. The purpose of the review and recommendations was to provide the concrete outcomes that you and your fellow petitioners are seeking.

As I highlighted in my recent response to the petitions committee, this work will take time, but it's essential that it's done correctly and thoroughly. This does not mean we are drawing a line in the sand, far from it. I understand that you have recently participated in the recent workshops with local authorities and provided your invaluable experience as part of this work. For this reason, I will decline your kind invitation to meet and ask that you continue to work closely with officials. This will ensure that yours and other stakeholders feedback is captured and included as the work progresses.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

This is a vital and extremely important piece of work, and I appreciate the eagerness to see changes considered and put into practice. Officials are continuing to work on the immediate priorities, and we need to allow them the time to carry out the relevant processes so that we can provide the relevant outcomes. I again thank you for your continued support in helping to shape the future process.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ken Skates', with a stylized flourish extending to the right.

Ken Skates AS/MS

Ysgrifennydd y Cabinet dros Drafnidiaeth a Gogledd Cymru
Cabinet Secretary for Transport and North Wales



The Case for Lifelong Blue Badges:

Voices from Lived Experience

“The application process causes a huge amount of stress and feelings of and the difficulties we face on a isolation for parents like myself. The mental impact is huge, forcing the reality of my child's lifelong condition daily basis. I have another child who should be in receipt of a blue badge but as of yet, I feel unable to put myself through another application.”

“My daughter has a diagnosis of cerebral palsy. It is a life long condition and will never get better. In fact as time progresses her symptoms have worsened as she ages. Recognising lifelong conditions will not only take pressure off of the system and the need to reapply but it will also take the pressure off carers who are already facing unnecessary burdens of paperwork. Lengthy process.”

“Due to not receiving the higher rate mobility component of disability living allowance at the time I made an application, I found the process extremely time consuming and emotionally draining. I am a parent carer to three children with lifelong multiple disabilities and on a good day, that is a huge responsibility, both mentally and physically. I initially put off making my application for over two years, as I just did not have the time or mental capacity, to complete the form and gather the necessary evidence needed for the application. When I finally summoned the strength and courage to do so, I found the process difficult. Despite providing a huge amount of evidence, I had to complete a long list of questions, that were already answered in the evidence I provided. As a parent to children with multiple profound, lifelong disabilities, completing the form had a huge effect on my mental health and well-being, as having to write all of the struggles that your child faces on a daily basis, hits hard. As a neurodivergent individual, this caused me to experience a prolonged period of depression and burnout for months afterwards.”

“Over complicated form filling. Those dealing with the application not understanding medical terminology, e.g. Aortic Stenosis”

“Having to prove I have a disability. When I have been disabled from birth and not being trusted.”

“Daughter is profoundly deaf, non-verbal and autistic. Told if she was blind, she'd get one. Had to fight to explain she doesn't understand road danger. Deafness is a loss of a sense. Sight and sound are both essential when it comes to children and danger.”

Table of Contents

Page 3	Overview of Survey
	How survey was conducted
	Representation within the survey
Page 4 - 8	Survey Key Findings
Page 9 - 14	In the Words of Participants - How a 'Life Award Blue Badge' Would Make a Positive Difference
Page 14	Summary of Key Findings
	Issues Identified
Page 16	Legislation and Equality Implications
	Key Concerns
Page 17	Recommendations

Overview of the Survey

Purpose of the survey

This survey was conducted by STAND North Wales CIC to better understand the thoughts, opinions, and experiences of individuals with lifelong diagnoses, and the carers who support them, when applying for a Blue Badge across Wales.

People with lifelong disabilities often face ongoing challenges in accessing the support they need. Despite having conditions that do not improve over time, many are still required to reapply for a Blue Badge every three years.

The survey aimed to gather real-life experiences to inform and strengthen the case for a fairer, more appropriate system for people with lifelong conditions. It supports the petition which began in April 2023, calling for Blue Badge applications to be made lifelong for individuals with permanent diagnoses.

How the survey was conducted

The survey was created on SurveyMonkey and the link shared with STAND North Wales CIC mailing list. This included all parents, carers and professionals, as well as adults with additional needs, that STAND North Wales CIC supports. The survey was shared on our social media channels where we encouraged people to take part and share within their communities. Additionally, this survey was shared by Members of Senedd.

Representation within the survey

The survey was live from 15th August to 8th September 2025 — a total of 25 days — and received 636 responses from across 20 of the 22 counties in Wales, indicating strong geographic coverage. A small number of responses also came from England, highlighting that concerns around the Blue Badge application process are not limited to Wales.

In addition, several participants indicated they lived in Wales but did not specify their county, meaning it is possible that all 22 Welsh counties were represented within the overall response data.

Survey Findings

The following section presents the key findings from the survey.

1. 634 participated in the survey
2. **To understand the age range of participants, the first question asked respondents to specify their age.**

We have gathered opinions from 634 participants which cover all age brackets

Under 18	1.10%	7
18–34	7.10%	45
35–54	37.38%	237
55–64	26.18%	166
65+	28.23%	179

3. **Survey participants were asked to specify their county of residence.**

The survey was shared across Wales, and we received feedback from 20 of the 22 counties, we also received some responses from England, highlighting that this is not solely an issue affecting Wales

Wales	93%	581
England	3%	21
UK	3%	13
		622
Did not answer question	1%	12

4. **We asked: "Do you have a lifelong diagnosis and require a Blue Badge, or are you a carer for someone who does?"**

The survey received 634 responses. Of these, 60.9% were individuals with a lifelong diagnosis who require a Blue Badge, and 42.5% were carers for someone with a lifelong diagnosis. Additionally, 6.7% identified as both a carer and a person with a disability. A further 6.79% of responses came from family members or support services who assisted in completing the application process.

5. We asked “Have you ever applied for a Blue Badge?”

A total of 634 respondents answered this question. The majority 96.21% indicated that they had applied for a Blue Badge

6. We asked if yes, how would you describe your first application experience?

It was found that 32.3% of the participants found it very easy or easy, **the majority** found the process difficult or very difficult with **38.9%**

7 & 8. Survey participants were asked, were you asked to provide medical proof of a lifelong condition?

75.7% of Participants answered "**Yes**", they were required to provide medical proof of their lifelong condition. Of these, 43.35% said the process was not straightforward, and 21.61% reported being asked to provide additional evidence. Some also noted that they were required to prove the genuineness of their supporting documents.

Pip assessment/award letter, Gp letter,

Same questions and growing bundle of supporting documents requested at every reapplication.

My father was subjected to medical examinations every three years to see if his amputated leg had regrown

Had to demonstrate degree of disability in the street outside house. Very demeaning

The amount of information I've had to provide again for the same condition that she's had since birth is ridiculous. It is not a medical condition which means we do not see medical professionals about it. So many of the letters we have are very old the NHS do not issue something as simple as a certificate of having a lifelong medical condition and naming it Although that would be very useful

Professional supporting with application - Supporting letters are always required and can take some time to be obtained which delays claim and adds stress for the client

9 & 10. Survey participants were asked, have you had to renew your badge even though your disability hasn't changed?

Yes	80.28%	509
No	19.72%	125
	Answered	634

80.28% of survey participants said '**Yes**' — they are required to renew their Blue Badge even though their disability has not changed.

19.72% said '**No**'. Based on the comments, this was often because they were either:

- holding a Blue Badge for the first time and had not yet reached the renewal stage
- supporting someone else with the application process (so it was not applicable to them)
- Stress of applying for initial badge

With **44%**, **227** participants to renew their blue badge was **either difficult or very difficult**

Some applying up to 7 times for 1 badge

Participants experience applying:

I Didn't reapply as know how stressful it was first time and as condition hasn't changed I didn't want to go through stressful process again so decided to abandon application.'

They have refused me outright with no right to appeal on the grounds I don't take enough tablets

I haven't managed to reapply - all too complicated and I'm too busy caring.

Professional supporting with application - Members are stating that the reapplication process is harder than the initial application, and that its very stressful. People's blue badges are running out before their new one arrives because you cannot reapply before 28 days of the expiry, and it can take up to 2 months for the blue badges to actually arrive.

Professional supporting with application - numerous times for several people.

11. Participants were asked, How often do you have to reapply?

Every year	7.89%	50
Every three years	77.76%	493
Other (please specify)	14.35%	91
	Answered	634

A majority of 77.76% report reapplying for a Blue Badge every three years. Meanwhile, 14.35% indicated that the question was not applicable to them. This group includes individuals who support someone else with the application process, some who have stopped applying altogether, and others who were unsure how often they reapply.

12. Participants were asked, do you have to complete the full application form each time you reapply?

Yes	85.49%	542
No	14.51%	92
	Answered	634

85.49% of participants said 'YES' they complete the Blue Badge application form in full each time. The remaining 14.51% answered 'No', this includes those who support someone else in completing the form, rather than filling it out themselves.

13. Participants were asked, have you been marked as 'Not for reassessment' (NFR)?

A total of **634** participants answered this question and **1.10%** said 'YES' they had been marked down as 'Not for Reassessment', that is **7 people** in total !

The majority of the participant, **68.7%** were not aware or unsure about the 'Not for Reassessment option' 436 participants in total

14. We asked participants, has your renewal ever been delayed, refused or left you without a blue badge for a period of time, if so for how long were you with a blue badge?

62.14% of the participants reported that they had been left without a blue badge for a period of time due to delays or length of application process, leading to increased stress, reduced independence, and in some cases, increased costs / fines or loss of access to vital services

Participants sharing their experiences:

Our re-newel was due during a period of time that we were at crisis. My daughter was engaging in serious self injurious behaviour and I had to prioritise my time. That meant by the time that I applied, I had to apply again, rather than re-new her badge. This left us without a valid blue badge for over eight weeks.

Lots of our members have reported that the process is really difficult, and stressful. Some members have refused to reapply because the process is so stressful and might leave them without the badge anyway. These members are now struggling because they dont have access to accessible parking.

Left it until a year later as I couldn't face it again so I struggled on and on and on.

15. We asked participants, has the (renewal) process caused stress, isolation, loss of independence or extra costs?

634 participants answered this question.

Some reported experiencing all of the listed issues, and a few even stated they had felt degraded.

Stress	77.60%	492
Isolation	19.09%	121
Loss of independence	34.54%	219
Extra costs	22.08%	140
Have not applied to renew	1.7%	11
'NO' hadn't causes any of the above	10.7%	68

16. We asked participants, would a life award make a positive difference to you or the person you care for?

A whopping 97.79 % (620 participants) said 'YES' a life award would make a positive difference to themselves, who they cared for or who they supported with their applications,

Only 2.21 % (14 participants) said 'NO' indicating it would not make a positive difference.

We asked how, having a 'Life Award Blue Badge' would make a positive difference ?

I am a full time carer for my adult daughter who has severe learning disabilities, I also work and have my own health conditions. My daughters condition will not ever change, she will not ever miraculously "get better", so I do not understand why this is yet another hurdle in the already hectic cycle of trying to remember her appointments, forms, benefits renewal/changes, discretionary care payments and associated paperwork and places to be. It is also difficult to get letters form benefits/doctors/hospitals with the exact wording that would be needed. Caring for an adult with LD is already stressful enough and we do not get enough support and recognition - it would be lovely to have just one of the burdens removed.

Truly, unless you have ever had a lifelong condition or worse still multiple conditions that develop as a result of how your initial condition may impact on your life and future health, you cannot possibly understand how soul destroying it can be. I am a very devout person but it shames me to admit I once considered taking my own life, such was the way that you could be viewed by the general public. I understand their anger, I truly do. There are sadly people who take advantage of the Welfare system and they are a disgrace and a scourge on humanity. Not all conditions are visible. Mine are multiple and I've had them for 40 odd years. The anger you feel inside at the constant need to prove your disabilities cannot be put into words, truly. To at least, as I say, receive a lifelong award or at least as in my PIP Case a ten year award takes some of the stress out of having to revisit something you cannot change. You cannot underestimate how important that is for peace of mind.

My son has been diagnosed with Autism Spectrum Disorder and has been awarded a blue badge based on his complete lack of awareness for danger, he's a traffic risk, his temporary paralysis of will and refusals to walk sometimes lying in the main road because of sensory overload. A blue badge has meant we are able minimise the substantial risk of danger to him and others when in public. He's diagnosed asd, he's always going to be autistic and having a blue badge that I don't need to renew and him have it for life long disability would mean one less thing to fight for when Sen parents have enough to fight for already .

It would give my children the dignity that they deserve, without having to constantly fight and advocate on their behalf, for what they are rightfully entitled to by law. It would reduce the pressure that falls on families like my own and improve our mental health and well-being, as each application really does have a substantial negative impact on us. Unless you have lived experience of raising children with a lifelong disability or having one yourself, you really won't appreciate the devastating effect it truly has on our emotional well-being. I am physically drained and holding on by a thread, and one day that thread is going to snap, unless there is a release of pressure somewhere, from the amount of admin and applications that we face. My children have lifelong profound disabilities, which will always entitle them to a blue badge; it is time that was taken into consideration and changes were made to the law. To consider that so many of the people submitting applications on behalf of other people have disabilities themselves, and the renewal process makes it so much more difficult for us who do. My concern is also the enormous amount of pressure that all the needless renewals are placing on our county councils, as well as health, social care,

and education services, due to the vast number of letters of support they are required to provide, at a time when they are already under pressure.

It would be one lot of paperwork we wouldn't have to fill in and we wouldn't have to remember when we need to start the renewal process to ensure we are not without a badge.

reassurance to individuals in maintaining their independence and access to community without the worry of renewing blue badge

Having supported individuals over many years i am fully aware how blue badges are crucial in maintaining independence and lifelong badge will replace the stress, worry and behaviours which I have seen due to badges being out of date or declined for no reason

You only need to apply once, so the initial stress is not repeated every few years. There also wouldn't be the constant reminder that you're not able to do things other people are and need extra support and aids to help with that- members reported that they don't like being reminded that they are disabled. One member said "my disability is for life, so why do i need to reapply every few years when nothing has changed?" All of our members who use a blue badge have expressed concerns about the reapplication process. Our members also said that it would give them more independence if they didn't have to reapply because a lot of our guys need support with applying/reapplying, which would mean that they would only need support once, rather than on an ongoing basis.

Of all the people I care for all of them have a life long condition which will not improve. Completing renewals for each of them is time consuming and stressful, especially as sometimes I need to complete a 2nd form filled with all the same questions. I understand my own disability could change and needs reviewed, but my son for example requires a wheelchair and has reduced mobility and pain which he will have for his life. Its unnecessary to have to complete the forms over and over. His renewal is currently late and he is actually without a badge right now because I am so busy with the caring responsibilities of my elderly parents I just haven't time to sort his badge out. But this means he can only travel with me as I have my badge and I can't rely on others to help transport him because he hasn't got his own badge at the minute.

Unpaid carers are juggling so many tasks, and some of us care for more than 1 person whilst also trying to do our jobs, run the house etc lifelong blue badges for those with life long conditions would just help manage 1 load of additional paperwork / tasks.

Even filling this form, I get the sense of dread when talking about disability, feeling I need to prove illness and disability. As have to complete PIP form to get proof of disability. The PIP form is very difficult to complete. Very distressing and upsetting. Is there a way to link PIP so automatically provides evidence and blue badge is provided.

Less worry, less admin work when there's not enough hours in the day and no respite. Please consider people that cannot access a scanner for documents!!

Not having to complete the full application and provide evidence yet again. This will happen with every PIP reassessment, as the entitlement award will not have been renewed before my blue badge expires. The delay caused by this failure to be able to reapply using the

automatic enhanced mobility pip award route for my blue badge gives rise to delays. This cost me in a parking fine as I had to park close to the pharmacy to collect my medication and when the expired badge was confiscated, I was compelled to walk considerably further in pain to access shops and friends.

It would create a relief as I wouldn't have to continuously prove myself in my community. I can live independently like most others can without the need for evidence. The PIP process is degrading enough, having a life long award would ease burden, admin and provide power for myself to live freely without an expiration date. I would like to ask that if there are people on the board who are considering this petition with no experience of disability. Please step out of your shoes and be alongside us in this decision to realise how extensive paperwork and admin is for disabled people/people with disabilities to just exist.

I hate having to list just how disabled I actually am. I leave it until the last possible moment to apply as I know it will depress me

As someone with a disability it feels like i spend my whole life filling out forms, or getting paperwork just to fill out a form. It's an extra thing that plays in the back of my mind that I will need to renew my badge. I'm not going to get any better I will always need a wheelchair, I will always need access to a bigger parking space to get in and out of a car, where I go my wheelchair goes so I will always need that blue badge. I dont like the stress of it and I would like one less bit of paperwork I need to fill out which reminds me im disabled im different to a lot of the population.

Having a lifelong disability can feel so isolating and often times I feel so different to others that I struggle with accepting support. Having to renew my blue badge is already a physical struggle to do but knowing that every 3 years I have to be reminded that I'm different and need more support is a mental struggle and often makes me feel as though I don't want to go through the hassle and difficulty. This means that in the future when I renew my badge, I may struggle with accepting that I need the support even though my disability will be life-long

Just not keep having to claim the same old help all the time for the same old condition. Incurable is incurable! GPs, Doctors and any medical professional's professional judgement should simply make life easier for us all. Accept medical expertise and stop making us prove something that we cannot prove - that's what the medical establishment is there for!

Because there is no reminder scheme, my badge went 8 months out of date and I could have been prosecuted for using it in that time up to £1000 and had my right to a badge removed. It was a thoughtful traffic warden who took the trouble to contact me about it. As it happens I wasn't parked in a Disabled parking bay, but he wanted to warn me that I was at risk, and that numerous others had fallen foul of this situation. Because it had expired, I had to make a new application from scratch.

Not having to prove every time that I am disabled and wasting tax payers money.

As someone with a disability it feels like i spend my whole life filling out forms, or getting paperwork just to fill out a form. It's an extra thing that plays in the back of my mind that I will need to renew my badge. I'm not going to get any better I will always

need a wheelchair, I will always need access to a bigger parking space to get in and out of a car, where I go my wheelchair goes so I will always need that blue badge. I don't like the stress of it and I would like one less bit of paperwork I need to fill out which reminds me I'm disabled I'm different to a lot of the population

It means as a daughter gets older she wouldn't have to apply as without us there is no way she could complete herself

*I wish to draw attention to the serious and far-reaching consequences caused by delays in the administration of the Blue Badge scheme. Because of significant inefficiencies in the processing of my application, I was left without the vital protections and entitlements that the Blue Badge is designed to provide. During this period of delay, I was placed in a position where, in order to meet essential day-to-day needs and access services, I was required to park in areas where, had my Blue Badge been issued on time, I would have been entitled to do so. As a direct result of not having the badge in my possession, I received multiple penalty charge notices. These fines were not the product of disregard for the law; they were an unavoidable outcome of administrative failure. Each instance arose from the practical reality of living with disability and the necessity of proximity parking to access health, work, and community services. The impact of this delay has been considerable. Firstly, there has been the financial burden of penalty notices. Secondly, I have been forced to undertake repeated legal challenges in order to contest these fines. This has required the preparation of appeals, the collection and submission of medical and legal evidence, and the navigation of complex processes that demand time, resources, and energy that could have been far better directed toward my health, professional obligations, and personal responsibilities. The burden has not only been financial and administrative but also emotional. To be placed repeatedly in a position where I must defend my right to reasonable accommodation, knowing that the very purpose of the Blue Badge scheme is to prevent such exclusion, is both distressing and frustrating. The system, in effect, has transferred the consequences of administrative delay onto me as a disabled person, creating a situation of disadvantage and inequity. This case highlights a broader structural issue. When applications for Blue Badges are delayed, disabled people are not simply left waiting for a piece of documentation. They are exposed to disproportionate risk of penalty, unnecessary legal conflict, and direct discrimination in accessing everyday life. In practice, this undermines the statutory obligations of public bodies to promote equality, provide reasonable adjustments, and prevent disadvantage under the Equality Act 2010. In light of these experiences, I urge consideration of reforms to prevent further recurrence. Potential measures include: * The introduction of interim or temporary permits to cover the period between application and final decision. * The establishment of clear statutory time limits for processing applications, with accountability for authorities that exceed them. * A directive to local authorities and enforcement bodies to exercise discretion, or to suspend enforcement action, where evidence of a pending application exists. The failure to implement such safeguards places disabled people in an untenable position: either restrict their own participation in society, or risk financial penalty and legal conflict while awaiting access to a scheme specifically designed to prevent such barriers. My experience demonstrates that the consequences of delay are not minor inconveniences but serious infringements on independence, equality, and dignity. This submission therefore seeks not only to record the personal impact of delay in my own case but also to highlight the urgent need for systemic improvement. Without reform, others will continue to face unnecessary hardship, legal battles, and exclusion as a*

result of administrative inefficiency. The Blue Badge scheme is intended as a mechanism of support and inclusion; it must not, through delays and failures of delivery, become a source of disadvantage and distress.

of the most important instruments for enabling disabled people to access everyday life on an equal basis. However, despite its intent, the scheme is hampered by outdated administration and an over-reliance on a medical model approach that often disadvantages the very people it is designed to support. Having lived with disability for over 43 years, and with more than 20 years' experience advising governments on disability and systems reform, I can attest to how the current scheme creates barriers rather than removing them.

At present, applications are still assessed heavily on medical evidence. This requirement obliges disabled people to gather, at personal cost and effort, detailed proof of impairment. It places undue emphasis on diagnosis rather than recognising the disabling barriers of the built environment. Such a system not only causes delay but also undermines dignity, forcing applicants to justify and re-prove their conditions rather than focusing on how inaccessible parking and mobility restrictions impact their participation in society.

A reformed scheme must be firmly based on the social model of disability. This means shifting the focus away from medical gatekeeping and towards lived experience, functionality, and the environmental barriers that limit independence. By adopting this approach, the Blue Badge would better reflect its intended purpose: not as a medical entitlement, but as a practical tool to remove obstacles that prevent disabled people from accessing work, healthcare, community life, and social participation. It would also bring the scheme into alignment with the Equality Act 2010 and with broader governmental commitments to equality and inclusion.

Digitisation represents another necessary step. The current reliance on a physical badge displayed in the windscreen is open to error, misuse, theft, and delay. A modern system should connect the entitlement directly to a vehicle's registration number so that enforcement officers, using existing number plate recognition technology, can immediately identify vehicles entitled to park under the scheme. This would reduce reliance on physical documents, prevent misuse, and cut down on unnecessary fines and disputes.

At the same time, it is essential to preserve flexibility for disabled people who travel in multiple vehicles, for example with family, carers, or friends. A hybrid approach is therefore required: a vehicle-linked entitlement for regular use, alongside a portable badge—whether digital or physical—that can be used when travelling in alternative vehicles. This ensures security, efficiency, and convenience without undermining the flexibility that many disabled people depend upon. For those who drive themselves, entitlement could also be linked to the driving licence, enabling enforcement checks to be carried out quickly and securely against both the individual and their vehicle.

Embedding these reforms would have several immediate benefits. It would reduce delays and the burden of medical evidence by introducing a streamlined, socially-grounded application process. It would lessen the administrative and emotional toll caused by enforcement disputes and fines. It would modernise enforcement through digitisation, aligning the scheme with the wider digital transformation of government services. Above all, it would restore dignity, fairness, and equality to a scheme that too often falls short of those values in practice.

Wales, as a nation that has consistently championed the social model of disability in both policy and legislation, is uniquely placed to lead this reform. If Wales were to implement a re-designed Blue Badge scheme that combined social model assessment with digital innovation, it would demonstrate to the rest of the UK how rhetoric can be translated into tangible systemic change. Such a step would not only alleviate hardship for disabled people in Wales but would also cement the nation's position as a progressive leader in disability rights and inclusion, setting a benchmark for others to follow.

The case for reform is therefore clear. The Blue Badge scheme must evolve from a static, medicalised, paper-based system into a modern, flexible, and socially-informed entitlement that genuinely removes barriers. Without this change, disabled people will continue to face delays, fines, disputes, and exclusion—consequences that are entirely avoidable in a society that claims to value equality and dignity.

These are just **some** of the participants reasons by having a Blue badge Life award would make a positive difference

Summary of Survey Findings

We have received the views from individuals across Wales and some England, covering all age categories. Participants include:

- Individuals with a lifetime diagnosis
- Carers
- People who are both individuals with disabilities and carers
- Professionals supporting the Blue Badge application process

The findings of this survey highlight not just operational failings in the Blue Badge system but raise serious concerns in relation to equality, human rights, and social justice.

Under the Chronically Sick and Disabled Persons Act 1970, the Welsh Government has the power, through Section 21, to lead meaningful and lasting change in how disabled individuals are supported.

The feedback gathered through this survey highlights widespread dissatisfaction within the current Blue Badge application and renewal process.

Below is a summary of key concerns and recommendations for change.

Issues Identified

1. Difficult and Repetitive Application Process

The initial and renewal application processes are described as unnecessarily complex, time consuming, and costly.

Repeated requests for identical information create an administrative burden for both applicants and health professionals.

The need to provide up to date medical evidence is especially difficult for those with lifelong conditions who may not have seen a health professional recently.

Many are asked to pay for duplicate documentation or to prove its authenticity, adding financial strain and stress.

2. Lack of Reminders and Communication

There is no official reminder system for when Blue Badges are due to expire. As a result, many individuals unknowingly lose their Blue Badge, leading to

- Parking fines
- Loss of mobility vehicles
- Increased isolation

3. Delays and Limited Reassessment Exemptions

Applicants are unable to reapply until a certain point before expiry, but many are still waiting beyond official timelines to receive a renewed badge.

Only 1.1% of applicants have been awarded a 'Not further reassessment' status, showing this provision is not effectively used for those with permanent, non-improving conditions.

4. Lack of Understanding of Disability

Application assessments are heavily focused on mobility, with limited understanding of hidden or unseen disabilities and assessors are often perceived as lacking appropriate training to understand the diverse nature of disabilities.

For example: 'I have a permanent stoma and since my operation last year, I struggle to find a suitable parking space which allows me to open my car door wide enough to get in and out without knocking my stoma and small hernia. I often need immediate access to a toilet and still experience fatigue and pain, but because I can walk a certain distance, I can't apply for a badge with my local council. I even had a supporting letter from my consultant. This is very unfair for those of us with unseen/hidden disabilities.'

5. Emotional Toll and Dignity Concerns

The process is widely described as stressful, demeaning, and triggering a “sense of dread”.

Individuals with lifelong, non-improving conditions report frustration at having to ‘prove’ their disability repeatedly, despite nothing changing.

There is a sense that the system does not trust medical professionals or lived experience.

Legislative and Equality Implications

The issues raised not only highlight operational inefficiencies but raise equality, human rights and social justice concerns.

Relevant Legislation:

Chronically Sick and Disabled Persons Act 1970 (Section 21): Empowers the Welsh Government to take meaningful action in supporting disabled people.

Equality Act 2010 & Public Sector Equality Duty (PSED):

- Eliminate discrimination
- Advance equality of opportunity
- Remove or minimise disadvantage
- Provide reasonable adjustments

Human Rights Act 1998:

- Right to live with dignity and respect
- Freedom from discrimination

Key concerns:

Requiring repeated evidence from individuals with permanent conditions can constitute to indirect discrimination and a failure to make reasonable adjustments.

The process undermines dignity, autonomy, and independence, violating the principles of the Equality Act and Human Rights Act.

It diverts public resources toward unnecessary administrative tasks and adds stress to those the system is meant to support.

Recommendations

The Welsh Government, known for championing the social model of disability, is uniquely placed to lead reform. By introducing a Life Award for those with lifelong, non-improving conditions, that rely on a blue badge, it can:

- Fulfil its obligations under Section 21 of the 1970 Act, the Equality Act 2010, the PSED, and the Human Rights Act 1998
- Reduce administrative waste
- Uphold dignity and autonomy
- And remove systemic barriers that impact disabled people and their carers.

We urge the Government to:

Introduce a Lifetime Award

- For individuals with lifelong, non-improving conditions, eliminating the need for reassessment and repeated applications.
- Improve Communication and Reminders
- Implement an automatic reminder system to inform individuals before their badge expires.
- Address Hidden Disabilities
- Ensure assessors are appropriately trained to consider a wide range of disabilities, including hidden and non-mobility related disabilities
- Reduce Bureaucracy
- Streamline the application process and reduce the need for repeated evidence, particularly where a lifelong condition is medically confirmed
- Uphold Rights and Dignity
- Design policies in line with equality, human rights, and social justice obligations.

Conclusion

The current Blue Badge system in Wales creates barriers rather than removing them, contradicting the goals of disability rights legislation. Urgent reform is needed to

- Uphold dignity
- Restore trust
- Reduce waste
- Ensure equal access to essential support

The introduction of a Life Award and the implementation of these recommended changes will better serve disabled individuals and carers across Wales and fulfil the Government's legal and moral responsibilities.

About STAND North Wales CIC STAND

STAND North Wales CIC STAND North Wales was formed in 2018 by Yvonne Brookes and Sarah McCulloch as a not-for-profit Community Interest Company in response to the closure of organisations representing families of children and young adults with Speech, Language and Communication Needs, Additional Needs and Disabilities in North Wales and is a parent led organisation. This survey was conducted to determine the suitability and accessibility, as well as the demand for, public toilet facilities across North Wales with particular interest regarding their suitability for families supporting children, young people and adults with additional needs and disabilities. For more information about STAND North Wales CIC, please visit our website: www.standnw.org If you have any queries, would like to know more about STAND North Wales CIC, or would like to receive information regarding our training, events and workshops for parents, carers and professionals, please email our admin Admin@standnw.org or call 07570 583 842

<https://www.standnw.org/>



Agenda Item 5.3

P-06-1525 Preserve the unique character of the Monmouthshire and Brecon Canal for the future generations of Wales

This petition was submitted by Jan Butler, having collected 13,847 signatures online and 169 signatures on paper, making for a total of 14,016 signatures.

Text of petition:

The Mon and Brec is one of the most picturesque and tranquil waterways in the UK winding through Bannau Brycheiniog National Park and through many rural and later urban communities as it makes its way from Brecon, through Talybont on Usk onwards through Goytre Wharf towards Newport. It provides the lifeblood to residents and communities in its path and attracts approximately 3 million visitors a year who make significant contribution to the local economy enabling these communities to thrive.

Additional information:

Since its inception by act of parliament in 1792 the canal has depended on water abstracted from the River Usk and its tributaries. The Usk at Brecon provides 80% of the water required. The water is not 'consumed' as it is returned to the river once it has travelled along the route. Until recently water abstraction did not require licences. For 200 years it has been free of charge. The canal, managed by the Canal and River Trust Wales (a charity), is now required by National Resources Wales to obtain a licence and limit water abstractions. Without a daily supply of water through its locks the canal will quickly become inoperable and closure will be inevitable. The consequences to the livelihood of our communities, natural environment and local economy are unthinkable. An unmanaged canal can lead to catastrophic failure and destruction of properties in its path. Dwr Cymru and NRW have indicated they will supply support water but at prohibitive cost which The Charity cannot afford.

Senedd Constituency and Region:

- Monmouth
- South Wales East

**Statement to the The Senedd Petitions Committee by Mark Flood
For Meeting on 22 September 2025**

P-06-1525 Preserve the unique character of the Monmouthshire and Brecon Canal for the future generations of Wales

Thank you for your Deputy Clerk's email dated 8 September 2025, inviting me to share my reflections on the plenary debate on 9 July 2025, as well as upon any updates or developments since then. As you know, I am not the petitioner but submitted a further petition on the same matter that was rejected as a duplicate. I am therefore most grateful for you seeking my views on the matter.

I am a member of the 'Preserve and Protect the Mon and Brec' Campaign Group (PPMB). This note is written from a personal standpoint but also reflects the views of the Group. I am a liveaboard boater on the canal, so it is my home that is at risk. There are a number of other liveaboard boaters on the canal who have made it their home, and all have their personal reasons as to why this is the case; but we all have in common a love for the beauty, tranquility, ecology and heritage of this very special place.

I will begin by turning the clock back to March this year. Around the beginning of that month, the fact that severe restrictions were being placed on the supply of water to the canal first became known to canal users and those businesses that rely upon it to generate millions of pounds of income to the local economy every year. PPMB was established in response. The winter works to the canal cease in mid-March, and that is when the length of the canal is open for use. Within a few days of opening, I received a notification from the Canal and River Trust (CRT) that I should find a safe place to moor with access to a fresh drinking water supply, as it was expected that the water level in the canal would drop so as to be unnavigable; this only requires around a 100 mm reduction from the normal level. The perilous effect of the onerous new water abstraction limits was immediately plain for all to see. Boat hire companies could not guarantee the delivery of booked holidays to their customers. Hospitality and tourism businesses along the length of the canal suddenly faced an uncertain future. I did not know whether to keep my boat on the canal, or be forced to move to another part of the canal network in England.

The CRT deal with Welsh Water, which followed concerted pressure from PPMB and others, secured top-up supply just in time; but at substantial financial cost to CRT and limited to a 12 month period only. CRT has consistently advised Welsh Government that the future extension of the deal on its current terms is unsustainable for a charity.

The petition attracted huge support. PPMB has fully supported Cllr Jan Butler, the petitioner, and as you know that petition resulted in the plenary debate on 9 July. I attended the debate and listened to what Members had to say, and it is clear that:-

- Welsh Government fully supports the canal and finding a solution that ensures it continues to function and thrive as it does today
- This support is heartfelt from Members and is cross-party
- The Petitions Committee has been particularly supportive, having visited the canal and discussed the issue with canal users
- All, including PPMB, recognise the challenges facing the River Usk, but the challenge facing the canal is not severable; these watercourses interact.

However, on the day I was frustrated by the indeterminate outcome of the debate, and I know that my colleagues in PPMB shared that frustration. The following day, a pre-arranged meeting of stakeholders took place (it seems I am not a stakeholder, although my personal stake in the canal could not be greater). From this meeting emerged an announcement by the Deputy First Minister that Dwr Cymru would be granted £5 million to upgrade the pumping station used to deliver the top-up water to the Usk. This was presented as a measure that secures the future of the canal. To date, I have seen no evidence to support this assertion. I am sure that Dwr Cymru is delighted that Welsh Government (and therefore the tax payer) has given it money to upgrade its infrastructure; however this is of no obvious benefit to the canal unless it means that Dwr Cymru does not then charge CRT for top-up water, or the charge is substantially reduced to account for reduced operating costs in delivering it via more efficient infrastructure. If neither scenario applies, then plainly the £5 million investment has no effect whatsoever in making the top-up water affordable to CRT as a registered charity.

There was a second element to the Deputy First Minister's announcement after the stakeholder meeting. This was the establishment of a 'task and finish' group (TFG) to consider long term options for finding a sustainable water supply solution of the canal. This was welcomed by PPMB, albeit the composition of the TFG has been somewhat shrouded in mystery. Its first meeting was to take place on 9 September 2025, and PPMB took a decision to wait for that meeting to take place, seek to establish its outcome, and only then consider further steps to promote the interests of the canal. In the event, the meeting was cancelled on 8 September due I understand to availability of the Deputy First Minister. We are assured that securing the future of the canal is a matter of urgency for Welsh Government, so I am sure you can imagine that I and my colleagues struggle to reconcile that with the meeting cancellation.

I assume that the purpose of the Petitions Committee meeting on 22 September is to review what progress has been made in response to Cllr Jan Butler's petition. There is no doubt that the petition and PPMB's campaigning has succeeded in drawing public and political attention to the perilous position of this much valued asset. Everyone wants to see the canal survive and thrive. Sadly, however, the reality is that the perilous state of affairs that pertained in mid-March 2025 remains the position. There is no solution for water supply to the canal once the current deal with Welsh Water expires in March 2026. Once again, I will receive a notification telling me to move to a 'safe place'. Once again, the hire companies will be faced with cancelling bookings (and right now they are in an invidious position in taking

bookings for 2026), and once again all the local businesses will face the same concerns about their viability. Leisure boaters will again be forced to decide whether to leave their boats on the canal; some have recently already made the difficult decision to take their boats to English canals.

The TFG needs to convene and undertake its work as quickly as possible, to avoid an annual cycle of uncertainty for all concerned. However, in the immediate term, a solution needs to be found for 2026 and subsequent years also, for as long as it takes to implement the TFG's long term solution. The immediate term solution needs to be found NOW, not in March 2026 when the adverse impact is already occurring. I respectfully request that the Petitions Committee recommends that an immediate, separate group forum is convened that includes CRT, Dwr Cymru, PPMB and the Petitioner; its sole purpose being to establish a solution for 2026. That solution should take into account the substantial financial benefit of the committed infrastructure improvement for Dwr Cymru, and how that is fairly reflected in what CRT is required to pay.

In the meantime, I shall continue to enjoy my floating home as best I can, notwithstanding the constant worry about its future.

Thank you for taking the time to read this statement.



Mark Flood
Narrowboat 'Take Five'

and on behalf of Preserve and Protect the Mon and Brec Canal.



Monmouthshire & Brecon Canal

Glandŵr Cymru Briefing for the Senedd Cymru Petitions Committee

September 2025

Introduction

- The Canal & River Trust is the charity that cares for over 2000 miles of canals and waterways across England and Wales. These canals are a vital asset for millions, providing environmental, social and economic benefit and resilience, and are at the heart of our industrial heritage. Glandŵr Cymru – the Canal & River Trust in Wales – works with partners across Wales to maintain our canals and waterways for the benefit of existing and future generations.
- We are grateful to the Petitions Committee for the opportunity to contribute an update on the Monmouthshire & Brecon Canal (the ‘Mon & Brec’) as part of the Committee’s follow-up work surrounding the petition on the future of the canal brought by Cllr Jan Butler in July 2025.
- While clearly facing uncertainty, since the debate in the Senedd in July, more positively, the canal has continued to serve as an attractor for the region and Wales, enjoyed by thousands over the summer period. It has been maintained by an investment by the Canal and River Trust of around £1million in its water supply since April (a rebate amount may be made at the end of the contract period in March 2026). This is despite drought conditions causing the closure of around 20% of the canal network across England and Wales. The Mon and Brec supply is the only canal water supply temporarily funded by the Trust across the network.
- The Senedd Petition Committee debate of 9th July demonstrated the scale of concern felt across political parties and beyond about the challenges to the Mon & Brec. This was further supported and reinforced on the day and subsequently by representation from the *Preserve and Protect the Mon & Brec* campaign group, members of the Commercial Operators Group as well as the Canal & River Trust.
- We welcome the Deputy First Minister’s acknowledgement of the significance of this issue and his statement during the Senedd debate that Welsh Government is ‘fully committed to enabling a workable solution’ as well as the subsequent

announcement of the Task & Finish Group to consider the issues surrounding the canal, water supply and funding. However, this group is yet to meet.

- Since the debate in the Senedd, the UK has continued to experience a prolonged period of drought. This has heavily impacted our canal network placing significant pressures on the Canal & River Trust as an organisation and our resources as a charity.
- This period of drought has had its own impact on the River Usk – declared as one area of drought in Wales by Natural Resources Wales (NRW). This, along with the limitations of the NRW abstraction licence for the Mon & Brec, has increased the volume of support water required to maintain the Mon & Brec under the Trust’s agreement with Dŵr Cymru Welsh Water. The purchase of that supply by the charity has ensured the operation of the Canal over recent months where otherwise, the canal would almost certainly have been subject to restrictions, closure and potentially harmful environmental impacts as a result of drought.
- We remain of the view that that as an asset of shared local, regional and national benefit, it is not sustainable, nor reasonable to continue to place the financial burden of the maintenance of the water supply of the canal on the Canal & River Trust as a charity.

Economic & Social Impacts

- The Mon & Brec stretches 56k through the Bannau Brycheiniog National Park and adjoins the Blaenavon World Heritage Site, supporting local tourism, wildlife, heritage and the wellbeing of nearby communities. It is a vital tourism asset hosting an average of **3.6million** visits per annum and 1021 private boats, alongside a busy hire boat trade with 54 boats for hire estimated to be used for approximately 6,734 days a year.
- The canal brings significant economic value to Wales both through the boating activities, visits to the towpath, and wider beneficial impacts on the local economy – particularly the local rural economy. The total economic activity or output generated by the canal comes to approximately **£30 million per year** contribution to the Welsh economy, supporting **1000 direct and indirect jobs**. This includes the direct impacts of the boating economy and the visitor towpath economy as well as the impacts on supply chains of these areas (canal-dependent businesses including hospitality and boating businesses, and employee spend, for example)

- Canal-dependent businesses – particularly boat hire companies – face a worryingly-uncertain future. They understandably require certainty to take bookings, make investment decisions and commit to staffing levels for the 2026 season. Businesses also report significant drops in bookings for 2026. This is why the Canal & River Trust is seeking progress on discussions to find a sustainable solution for the canal
- the Mon & Brec is not only a vital environmental and social asset but also remains central to the economy of those areas through which it passes, and particularly to the economy and attraction of Bannau Brecheiniog, in which it is the Park's most visited attraction. This has driven ambitions by partners to restore other sections of the canal in coming years

Water Resourcing

- The Trust has maintained an active conversation in recent months with DCWW regarding management of water supply to the canal and the wider consequences of water resource pressure due to lack of rainfall and drought. While dealing with immediate pressures, our engagement with DWCC has also focussed on the exploration of alternative sources of water supply for the canal.
- Following the Senedd debate in July, Welsh Government announced the investment of £5 million in the Manorafon pumping station owned by DCWW. While this investment was unexpected for the Trust, it ostensibly supports water supply resilience and is therefore welcome. However, we were clear at the time and remain of the position, that this investment does not address the more urgent substantive question of the ongoing operational costs of that supply in the year past March 2026 which to-date have been paid only by the Canal & River Trust. Hence from the Trust's point-of-view the investment in itself does not provide the sustainable solution to the financial challenge caused by the new licensing conditions.

Conclusion

- We believe that the short-term challenge to the future of the canal remains significant, and this has changed little since our briefing to Senedd Members at the time of the debate, notwithstanding the announcement of the formation of the Task and Finish Group. However, this group has not yet met and so it has been difficult to move this issue forward.



Glandŵr Cymru
Canal & River Trust in Wales

- The Canal & River Trust remain committed to working with partners across governments and other organisations to determine an agreement that resolves the short, and longer-term pressures facing this vital environmental, social and economic asset and secure it for future generations. We hope that the Task & Finish Group will be able to meet soon to move forward at pace and reach an agreement giving the certainty that all partners would wish to see.

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet
dros Newid Hinsawdd a Materion Gwledig
Deputy First Minister and Cabinet Secretary for
Climate Change and Rural Affairs

Eich cyf/Your ref P-06-1391
Ein cyf/Our ref HIDCC/01369/25

Carolyn Thomas MS
Chair - Petitions committee

19 August 2025

Dear Carolyn,

Thank you for your letter of 25 July 2025, regarding petition P-06-1391 - Introduce regulation of the dog grooming sector, to protect the welfare of dogs and rights of owners, and your request for clarification on the timeline for this work.

On 24 June 2025 I issued a [written statement](#) on the Government's [response and next steps](#) to the [consultation](#) on the licensing of animal welfare establishments, activities and exhibits. As you know, we will take a phased approach to introducing a national model for the regulation of animal welfare, working closely with stakeholders, operational agencies, industry and the third sector.

My focus for the remainder of this Senedd term will be on developing proposals for the regulation of animal welfare establishments, including rescues, sanctuaries, rehabilitation and rehoming centres, and on delivering our other priorities for animal welfare, which are set out in our five-year animal welfare plan [for Wales, 2021-26](#).

In focusing on animal welfare establishments in phase one, I hope to channel efforts to where regulation can deliver the greatest benefit, taking into account the evidence, views and information submitted and the particular issues arising from a current lack of regulatory oversight and support.

We will consider pet grooming in a secondary phase of the national model, and it is not currently within the scope of our priorities for the remainder of this Senedd term. I recognise the need for consistent, proportionate, and enforceable standards to protect animal health and welfare and am keen to see work progress as soon as practicably possible.

This marks a significant milestone in our commitment to improving animal welfare standards across Wales. Though it will not happen overnight, I am confident the national model will affect positive progress for thousands of animals across Wales, and I am committed to getting it right.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

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Gohebiaeth.Huw.Irranca-Davies@llyw.cymru
Correspondence.Huw.Irranca-Davies@gov.wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Thank you for writing to me. I hope you find this response helpful.

Yours sincerely,

A handwritten signature in black ink, consisting of several fluid, overlapping strokes that form a stylized representation of the name 'Huw Irranca-Davies'.

Huw Irranca-Davies AS/MS

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd
a Materion Gwledig

Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet
dros Newid Hinsawdd a Materion Gwledig
Deputy First Minister and Cabinet Secretary for
Climate Change and Rural Affairs

Eich cyf/Your ref P-06-1527
Ein cyf/Our ref HIDCC/01174/25

Carolyn Thomas MS
Chair - Petitions committee

15 July 2025

Dear Carolyn,

Thank you for your follow-up letter of 17 April regarding the Senedd Petition Committee's consideration of Petition P-06-1527 and the Committee's request for an update on the review of The Bathing Water Regulations 2013 (the Regulations).

Following our consultation in collaboration with UK Government on reforms to the Regulations, the Welsh Government published its [response](#) on 12 March 2025. I also published a [Written Statement](#) at the same time. These reaffirmed our commitment to protecting and improving the quality of bathing waters across Wales.

Informed by valuable feedback from a wide range of stakeholders, the reforms aim to modernise the regulatory framework, introduce greater flexibility, and strengthen protections for both the environment and public health. Key changes include the removal of automatic de-designation, the introduction of feasibility assessments to support water quality improvements, and the move from fixed bathing season dates in legislation to flexible guidance.

Alongside these, nine technical amendments will simplify processes and ensure regulations remain fit for purpose. These changes will be taken forward via a Statutory Instrument, with implementation expected in the Autumn, as part of our broader ambition to deliver cleaner, safer, and more resilient bathing waters for the future.

While dog fouling was not included as a specific area of consultation, it remains an important local concern. As noted in my previous response to the Committee on this matter, responsibility for managing dog access on beaches lies with individual Local Authorities and I believe they are best placed to make decisions on this matter.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

I note the Committee agreed with this position and that Petition P-06-1527 has now been closed.

Yours sincerely,

A handwritten signature in black ink, consisting of several fluid, overlapping strokes that form a stylized representation of the name.

Huw Irranca-Davies AS/MS

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd
a Materion Gwledig

Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs



Eich cyf/Your ref P-06-1489
Ein cyf/Our ref RE/00769/25

Carolyn Thomas MS

Chair - Petitions committee

5 August 2025

Dear Carolyn,

Thank you for your letter forwarding the further questions and concerns of the Petitioner (Petition P-06-1489 Legislate to ensure swift bricks are installed in all new buildings in Wales) to the Committee. Your letter has been transferred to me for answer as the concerns and questions primarily relate to planning policy.

The Petitioner is unclear what concerns are being raised by the Deputy First Minister in his response to the Committee, dated 01 May. In particular, the Petitioner requests clarification on what the 'adverse and unintended consequences' of legislating for swift bricks might be.

From a planning perspective I can address the adverse and unintended consequences question raised by the Petitioner. When establishing a policy position, it is the normal course of action to establish whether the possibility exists for negative effects to occur which are not planned or expected or which could undermine the intentions of existing policy.

Whilst I agree with the Petitioner that a swift brick is an effective solution to help nature in some circumstances, potential adverse and unintended consequences could occur when efforts are always focused too narrowly on one solution. Too narrow a focus may undermine the broader intentions of existing legislation and policy to maintain and enhance biodiversity and is likely to result in efforts being limited only to the mandated solution.

Planning policy is in place to ensure that new developments provide a net benefit for biodiversity, that is, they should leave nature in a better state than before and this should reflect places and their context. The concern is that developers will focus on the installation of swift bricks as their only contribution to securing a net benefit for biodiversity and this is likely to act as a short cut to avoid doing wider and potentially more meaningful work, such as pollinator friendly planting, pond creation, hedgerow planting, or restoring degraded habitats. This would lead to less effective outcomes for nature overall, even though the intention of installing a swift brick was well meant in terms of its role as a positive conservation action.

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Nature recovery is complex. Different places need different solutions depending on the local wildlife and environment. Swift bricks could be provided now in the right circumstances but a one-size-fits-all rule requiring swift bricks may not be the right fit everywhere. Negotiating planning applications is a complex and site-specific process and it is reasonable to suggest that the pursuit of a single conservation measure for schemes is easier than taking potentially more bespoke and desirable actions that would secure wider biodiversity benefits. Therefore, whilst swift bricks would in ideal circumstances be complementary to wider efforts the unintended outcome may be that they become the only outcome.

Instead of focusing on one measure, the goal of planning policy is to maintain and enhance biodiversity and secure ecosystem resilience. Taking a net benefit approach ensures that local authorities think strategically about their sites and developers understand the local environmental context of their sites and consequently design schemes that deliver lasting benefits for biodiversity.

I trust that the above helps in addressing the Petitioner's question to the Committee.

Yours sincerely,

A handwritten signature in black ink that reads "Rebecca Evans." The signature is written in a cursive, flowing style.

Rebecca Evans AS/MS

Cabinet Secretary for Economy, Energy and Planning
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio

Eich cyf/Your ref P-06-1335
Ein cyf/Our ref KSNWT/00794/25

Carolyn Thomas MS
Chair - Petitions committee

04 August 2025

Dear Carolyn,

Thank you for your letter of 15 May regarding ensuring learning disabled passengers are involved in discussions with officials and TfW on how best to improve the passenger experience for vulnerable adults, as requested by Mencap Cymru.

In my oral statement on 1 April, I set out my commitment to Travel for All; changing the way that we do transport policy in Wales to ensure that access and inclusion is genuinely at the heart of everything that we do. We recognise that accessibility is both a non-negotiable matter of human rights and discrimination, and a health and safety issue. It is not an optional customer service matter.

Some of the actions we are taking to make this a reality include establishing an Inclusive Travel Board, which will work across transport modes and include representation from all protected characteristics. It will work with our existing boards to support officials and Transport for Wales in making our transport networks feel safe and welcoming, and, importantly, improve accessibility.

We will also increase support to the Transport for Wales Access and Inclusion Panel to help ensure that the rights and voices of disabled people are central to shaping transport design and delivery across all modes. By integrating their perspectives and expertise, we aim to create an inclusive transport infrastructure that respects and upholds the rights of all disabled people, including learning disabled passengers.

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We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

My officials would be delighted to have Mencap Cymru's involvement in the design of these governance structures to make sure they have sufficient representation and allow for robust advice and guidance to Welsh Government and Transport for Wales on how we can make Travel for All a reality.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ken', is enclosed in a light grey rectangular box.

Ken Skates AS/MS

Ysgrifennydd y Cabinet dros Drafnidiaeth a Gogledd Cymru
Cabinet Secretary for Transport and North Wales



Home Office

Agenda Item 6.5

Rt Hon Dame Diana Johnson
DBE MP
Minister of State for Policing and
Crime Prevention
2 Marsham Street
London SW1P 4DF
www.gov.uk/home-office

Carolyn Thomas MS
Welsh Parliament
Petitions Committee
Cardiff Bay, Cardiff
CF99 1SN

DECS Reference: MIN/1338919/25

2 September 2025

Dear Carolyn,

Thank you for your letter of 4 June regarding petition P-06-1463 on the funding of the School Beat Cymru programme. I am very sorry for the delay in replying. I note the Petitions Committee's consideration of this issue and its decision to close the petition, as well as the commendation of the Welsh Government for funding the programme to date.

As you will be aware, policing is a reserved matter under the Welsh devolution settlement. Decisions relating to the delivery of local policing initiatives in Wales, including the provision of programmes such as School Beat Cymru, remain the operational responsibility of Chief Constables and Police and Crime Commissioners. The Government is committed to giving police the resources they need to tackle crime. The 2025-26 police funding settlement provides funding of up to £19.6 billion for the policing system in England and Wales, an overall increase of up to £1.2 billion when compared to the 2024-25 settlement.

While the Welsh Government has chosen to withdraw its funding for the School Beat Cymru programme, it is of course open to local policing bodies to determine whether and how such activity is prioritised within their force areas.

I appreciate the Committee's interest in this matter and its recognition of the importance of community engagement between schools and policing partners.

I am copying this letter to the Secretary of State for Wales

Yours sincerely,

Rt Hon Dame Diana Johnson DBE MP
Minister of State for Policing and Crime Prevention

Agenda Item 6.6

Ysgrifennydd y Cabinet dros Iechyd a Gofal Cymdeithasol
Cabinet Secretary for Health and Social Care



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1528
Ein cyf/Our ref JMHSC/01857/25

Carolyn Thomas MS
Chair
Petitions committee

Petitions@senedd.wales

26 August 2025

Dear Carolyn,

Thank you for your letter of 10 July following the committee's consideration of petition P-06-1528: Prevent Powys patients who are treated in English hospitals from facing increased waiting times.

On 19 June, I announced an ambitious £120m plan to continue to drive down the longest waits for planned treatment in Wales this year. This is designed to eliminate two-year waits; reduce the overall waiting list by 200,000 and restore the maximum eight-week target for diagnostic tests by March 2026.

I have been clear about the need to improve waiting times for all people in Wales and to reduce the unacceptable variation which exists across Wales.

Powys Teaching Health Board has received a share of funding as part of this plan to treat patients within the county – this includes funding to provide more than 600 additional outpatient appointments and to eliminate the all waits of more than eight weeks for diagnostic tests. The health board will also benefit from additional non-emergency patient transport capacity, funded by the Welsh Government to support additional outpatient activity across Wales.

Powys residents who are being treated in hospitals in other Welsh health boards will also benefit from the £120m which is being shared across the other health boards. At the end of May, Powys residents accounted for 380 pathways waiting more than 52 weeks for a first outpatient appointment, and 58 pathways waiting more than two years across at other Welsh health boards.

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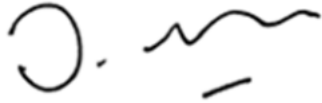
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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

As a provider, Powys Teaching Health Board had no pathways waiting more than 52 weeks for a first outpatient appointment and no referral to treatment (RTT) pathways waiting more than two years at the end of May.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'J. Miles', with a wavy line and a short horizontal stroke below it.

Jeremy Miles AS/MS

Ysgrifennydd y Cabinet dros Iechyd a Gofal Cymdeithasol
Cabinet Secretary for Health and Social Care

Agenda Item 6.7

Correspondence from Founder member – Lived Experience Advisory Panel for Prescribed Drug Dependence (LEAP for PDD) Mark Isherwood MS

Dear Mr Isherwood,

I am writing in connection with your correspondence with Mary Hennessey and Shane Cook, co-founders of the Prescribed Medication Withdrawal Peer Support Group.

I wish to draw your attention to the fact that this is not the first time I, together with Mary and Shane, have been involved in highlighting the shocking lack of understanding and support for people struggling with antidepressant withdrawal. In August 2017 I raised a petition via the Welsh public petitions system on this very subject: **P-05-784 Prescription drug dependence and withdrawal - recognition and support** ¹

During the petition's process I described the fundamental problems making the actions called for in the petition necessary, namely:

A lack of willingness to admit that antidepressants are problematic, perhaps as a result of a lack of available alternatives for doctors and patients

Reluctance to listen to the concerns of patients and acknowledge dependence or withdrawal symptoms

A lack of available services even when dependence or withdrawal is recognised, and an inappropriate reliance on drug misuse services

An absence of formal consistent advice on drug tapering

The cross-party members of the Petitions Committee carried out a detailed investigation, including calling on members of the public to write in with their own personal experiences of taking antidepressants. Mary Hennessey and Shane Cooke were contributors to that consultation. The report produced in March 2019 made 10 recommendations for change. See pages 6 – 7.²

You will see that the Petitions Committee's recommendations do not differ significantly from the key actions outlined in Harriet Vogt's "*Patient recommendations for addressing the antidepressant withdrawal awareness and support gap. Summary report.*"

The Health Minister at the time, Vaughan Gething, responded by accepting 9 of the 10 recommendations. However, it was clear from his correspondence that, despite the Petitions Committee understanding fully that patients with prescribed drug dependence and withdrawal need a different level of care and support than those who misuse drugs, he and his team did not. A person who has taken drugs as prescribed should not and must not be offered a service aimed at those who misuse.

Here we are in 2025 with experiences which show that although there is (seemingly reluctantly) a willingness within the medical profession to acknowledge antidepressants can

lead to withdrawal which in some cases may be severe, there are still no national services to support those in withdrawal and no widespread, accessible information for prescribers on how to de prescribe safely.

On a personal note, I cannot praise highly enough the work of the members of the Petitions Committee and their administrative staff at the time. However, in the intervening years I am left feeling that the system itself is pointless if their conclusions are ignored. In fact, their work contributed more to the campaign in England, led by the Westminster based All Party Parliamentary Group for Prescribed Drug Dependence (since renamed the Beyond Pills APPG), than in Wales. We took data from the stories sent in by the public from the Welsh Petition, and the sister petition in Scotland **PE01651: Prescribed drug dependence and withdrawal**³ and supplied it to the 2019 Public Health England "*Dependence and withdrawal associated with some prescribed medicines - An evidence review*".^{4,5}

The recommendations from this review led to an updating of the NICE Guidelines NG215 and NG222, where it is now recognised that antidepressant withdrawal can be severe and long lasting for some, and that the drugs need to be tapered slowly to mitigate withdrawal effects.

I urge you to take seriously and support the work of the Prescribed Medication Withdrawal Peer Support Group, and to personally sponsor the Key Actions in Harriet Vogt's report.

In the meantime, I would welcome the opportunity to discuss this matter further with you.

Yours sincerely,

Stevie Lewis

Founder member – Lived Experience Advisory Panel for Prescribed Drug Dependence (LEAP for PDD)

<https://leap4pdd.org/>

References

1. <https://business.senedd.wales/mglIssueHistoryHome.aspx?lId=19952>
2. <https://senedd.wales/media/zppfxkzo/cr-ld12429-e.pdf>
3. <https://webarchive.nrscotland.gov.uk/20240327083620/http://archive2021.parliament.scot/GettingInvolved/Petitions/PE01651>
4. https://assets.publishing.service.gov.uk/media/5fc658398fa8f5474c800149/PHE_PMR_report_Dec2020.pdf
- 5* <https://pubmed.ncbi.nlm.nih.gov/33224468/>

**The 'patient voice': patients who experience antidepressant withdrawal symptoms are often dismissed, or misdiagnosed with relapse, or a new medical condition*

Authors: Dr Anne Guy, Marion Brown, Stevie Lewis, Dr Mark Horowitz

Published in Therapeutic Advances in Psychopharmacology, the data for this paper were taken from the stories sent in by the public to the Welsh and Scottish petitions.