

I watched the committee meeting on 22nd September 2025 with considerable concern. The evidence presented was limited to representatives who appeared to lack initiative (NRW, Wrexham Council) and Mark Silvester, the CEO of Enovert.

Mark Silvester, CEO of Enovert, asserted that the company operates in a proactive manner.

In December 2023, NRW issued an Enforcement Notice identifying several actions that needed to be addressed. This raises questions regarding the claim of proactive management. On 8th March 2024, NRW identified additional gas emissions, requiring Enovert to undertake remedial measures. From November 2024 through January 2025, NRW recommended further actions and detected offsite odours. In May of the same year, more odours were recorded. These incidents appear to reflect a reactive, rather than proactive, approach to management. In February 2025, there were five permit non-compliances relating to leachate management, landfill gas, chloride monitoring, and surface water monitoring. Additionally, during the final quarter of 2024, there were 26 methane emissions exceeding the permitted level. Such a pattern does not align with the principles of proactive management. Remedial action, by definition, suggests a lack of proactive management, as it involves responding only when required. I am concerned that if oversight diminishes, Enovert may revert to meeting only the minimum requirements necessary.

During the meeting, Enovert emphasized its efforts to engage with the community. The Hafod Landfill Stakeholder Group, however, was only established in early 2025 and convened its inaugural meeting six months ago. While Enovert states that it takes complaints seriously and investigates each one, tangible actions did not commence until the volume of complaints increased and a petition was submitted.

Much has been made of the monitoring processes; however, to date, only one monitoring station exists within the community. Although transparency was promised, the community is still awaiting the publication of relevant data. All data and its interpretation are controlled by Enovert, raising concerns about impartiality. Appendix 4 of the Report of Hydrogen Sulphide Levels at Johnstown's Community Centre references workplace exposure limits, which are inappropriate for assessing environmental exposure among vulnerable or young individuals. The World Health Organisation (WHO) standards are significantly lower and, along with permit levels, should serve as the basis for assessment. As the data on page 14 of the report demonstrates, permit levels at the community centre—located a mile from the site—were exceeded nearly daily throughout March 2025. There are approximately 300 homes even closer to the landfill, which are likely to have experienced higher exposure. These exceedances occurred while Enovert was under increased scrutiny, raising concerns about conditions when oversight is reduced.

Public Health Wales (PHW) has stated that it does not require notification of routine findings "unless the data shows significant concerns, for example, concentrations routinely exceeding exposure standards." However, the document fails to specify what constitutes the relevant exposure standards.

Furthermore, PHW advises that occupational exposure standards are not suitable for assessing risks to the general public.

Mr. Silvester also addressed Enover's Odour Management Plan, noting that it is updated only every two years. This infrequency calls into question the company's claims of proactive management, particularly given the persistent odour issues affecting the community.

Wrexham Council reported that local councillors submitted a joint response indicating a reduction in complaints during 2025. This may be attributed to comments made to residents, discouraging them from voicing concerns on social media and emphasizing the unseen efforts of the council. The council itself acknowledged that public communication needs to improve in order to rebuild trust and demonstrate that action is being taken when issues arise.

As a resident, I have observed that odours tend to intensify following rainfall. This correlation was largely dismissed during the meeting, despite readily available research indicating that rainfall generally increases landfill methane (CH<sub>4</sub>) emissions by increasing soil moisture and drainage, which enhances gas diffusion and vertical transport, although very heavy rainfall can temporarily reduce emissions by filling pore spaces. Long-term climate change affecting precipitation regimes can alter total landfill gas production, with increased precipitation potentially leading to higher gas generation. While rainfall events can temporarily decrease surface emissions, post-event drainage and changes in soil moisture can lead to significant post-rain emissions.

This situation is complex, with responsibility often being shifted among the involved parties. During the meeting, I observed what could be described as 'selective truth'—participants presented information that was either difficult to challenge or supportive of their position, without fully addressing the broader context. It was disappointing that no individuals directly affected by the landfill were present to counter these claims. I believe that Steve Gittins, the petitioner, could have posed more probing questions and provided a more comprehensive perspective than was offered by the committee members. I hope that residents will be afforded the opportunity to address the committee and present a more accurate account of the facts.