

# Legacy Statement: Response to the Welsh Government Report on Petition P-06-1510

On behalf of the residents of Johnstown and the surrounding communities, we wish to express our sincere gratitude to the **Welsh Government** for its diligence and professional scrutiny regarding the Hafod Landfill Site. We are encouraged by the Deputy First Minister's acceptance, in principle or in full, of the majority of the Petitions Committee's recommendations. While this represents a significant step toward transparency, our ultimate goal remains the protection of public health through the **revocation of the environmental permit**.

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## Responses to Recommendations

### Recommendation 1: Calibration of Monitoring Data

- **Our Position:** We welcome the acceptance in principle. However, given that historical data has been amended on three separate occasions, we request the immediate release of all **RAW data** for independent scrutiny. Calibration alone is insufficient if the community cannot verify the foundational numbers.

### Recommendation 2: Training for 'Sniff Tests'

- **Our Position:** We support the requirement for NRW staff to undergo accredited training. To ensure these records are pivotal and critical, we propose that NRW employs **digital H2S handheld devices** that record concentrations alongside **GPS coordinates and date/time stamps**. This removes human subjectivity and provides an immutable digital audit trail.

### Recommendation 3: Mandatory Automated Odour Monitoring

- **Our Position:** The Welsh Government's acceptance in principle is a start, but NRW's claim that they "**wouldn't even know what to test for**" is a masterclass in playing coy. When a community smells rotten eggs, you don't need a PhD in atmospheric chemistry to reach for an H2S sensor.
- **The Logic Gap:** Suggesting that measuring H2S is merely an "occasional surrogate" for an odour is like saying a thermometer is just an "indicative surrogate" for whether or not you are currently standing in a fire.
- **The Evidence:** AQMesh monitors currently deployed in the community show H2S levels exceeded WHO guidelines **37% of the time**. To pretend the source is a mystery while the stench gets exponentially stronger as you approach the landfill boundary borders on gaslighting.

## Recommendation 4: Clarifying Local Authority Powers

- **Our Position:** We accept the principle of clarifying roles. We urge the Cabinet Secretary for Climate Change and Rural Affairs to engage with Wrexham Council to ensure they use their existing powers—specifically **Abatement Notices**—to protect the community rather than shying away from "double regulation".

## Recommendation 5: H2S Thresholds in Permits

- **Our Position:** We strongly appeal the rejection of this recommendation. NRW's logic represents a convenient regulatory blind spot and a masterclass in administrative "gaslighting." By admitting that Hydrogen Sulphide causes the "rotten egg" smell that plagues the community, yet refusing to monitor it because it might not be the *only* gas present, they have effectively legalized a nuisance. This is like a fire department refusing to measure smoke because "smoke isn't the only byproduct of fire."
- **Misusing WHO Guidance:** NRW's attempt to weaponize the World Health Organization is intellectually dishonest. They quote WHO guidelines stating that S<sub>2</sub>H concentrations over 7 μg/m<sup>3</sup> produce "substantial complaints," yet use that very document to justify *not* monitoring it. To describe monitoring as "ad-hoc" after 20 years of documented distress is not a regulatory strategy; it is a total abdication of environmental protection. Without a numeric threshold in the permit, "monitoring" is merely an expensive way of telling residents what their noses already know, while providing the operator with a permanent "get out of jail free" card.

## Summary of the Circular Logic

The NRW's stance can be boiled down to this:

1. We won't set a limit because \$H\_2S\$ isn't the *only* problem.
2. We will focus on "site management" instead.
3. Site management is failing (hence the complaints).
4. We cannot prove site management is failing legally because we have no H<sub>2</sub>S limits in the permit.
5. **Go back to Step 1.**

## Recommendation 6 & 7: Climate Resilience and Rainfall Correlation

**Our Position:** We accept these recommendations but highlight the staggering disconnect between the operator and reality. Enovert continues to deny any correlation between rainfall and \$H\_2S\$ emissions, despite the Welsh Government's own admission that a "demonstrable link" exists.

**The Antiquated Permit:** The current permit is no longer fit for purpose. It fails to regulate modern-day landfill operations against the backdrop of a changing climate. A site that cannot handle increased rainfall without leaking toxic odours into Johnstown and surrounding communities is, by definition, not climate-

resilient. Maintaining an outdated permit is not "stability"; it is a refusal to adapt to the physical reality of the site's failure.

- **Recommendation 8: Data Interpretation and Frequency**
- **Our Position:** Transparency is the only antidote to the "smoke and mirrors" approach currently in play. Raw data is useless if it is filtered through the lens of those responsible for the failure. We expect Wrexham Council and the Stakeholder Group to publish **independent** interpretations of monitoring data at least quarterly. If the NRW claims the site is "well-managed," they should have no fear of third-party scrutiny.
- **Recommendation 9, 10, & 11: Transparency and Resident Representation**
- **Our Position:** We agree that Wrexham Council must demonstrate and publish its scrutiny of the site in simple, non-bureaucratic terms. Meeting minutes must be published punctually and be fully accessible to the public, not buried in obscure portals.
- **Direct Representation:** We welcome the inclusion of up to three resident representatives on the Stakeholder Group. For too long, these meetings have been a closed-loop conversation between the polluter and the regulator. The community is the primary stakeholder—we are the ones living with the consequences of these "ad-hoc" failures—and our voices must be present where decisions are made.

**Steve Gittins**

**Lead Petitioner : P-6-1510**

## Formal Request for Internal Review & Freedom of Information

To: [REDACTED] CC: Michelle Morris (Public Services Ombudsman for Wales) Reference: Complaint against Wrexham County Borough Council

Date: February 13, 2026

Your Ref : 202509035

Dear [REDACTED]

I am writing to formally request an **Internal Review** of your decision not to investigate my complaint. Your characterization of the Council's decision as "properly made" is not only subjective but ignores the wider context of administrative failure and the specific findings of both the Senedd and Audit Wales.

### 1. Vindication by the Senedd Petitions Inquiry (P-6-1541)

Your letter states there is "no evidence of service failure." This is factually incorrect. The **Senedd Petitions Inquiry** report, published in January 2026, specifically vindicated my position as lead petitioner. The inquiry found:

- **"Lacking Transparency"**: Wrexham Council was found to be sadly lacking in its engagement and transparency regarding this 20-year campaign.
- **Breakdown in Trust**: The Committee noted a profound breakdown in trust caused by the Council's failure to communicate honestly with residents.
- **Validation of Persistence**: The report highlighted that "complaint fatigue" and the silencing of residents are real issues in Wrexham, effectively acknowledging that my persistence is a necessary response to being ignored.

### 2. Evidence of Governance Failure: Audit Wales (Sept 2025)

You suggest the Council's decision to block my communication was a "properly made" discretionary choice. However, the **September 2025 Audit Wales Report** into Wrexham Council paints a damning picture of their internal culture. The Auditor General found:

- An **"unhelpful blame culture"** where senior leadership is plagued by **"distrust."**
- **"Insufficient progress"** in addressing governance failures.
- Actions that **"endanger the Council's reputation"** and the integrity of its decision-making.

For the Ombudsman to accept a "vexatious" characterization from an organization officially branded as having a "blame culture" is a failure of oversight. My "persistence" is the only tool left when faced with what Audit Wales describes as a fractured and failing administration. This is **bureaucratic gaslighting** at its very best.

### 3. Discrediting the Ombudsman as a "Shield"

The Ombudsman's 2024-25 performance data confirms a worrying trend. While complaints against local councils have **increased by 54%** since 2019, your **intervention rate has dropped to 18%**. This suggests your office is acting as a shield to protect public service staff rather than a safeguard for the public.

#### **4. Freedom of Information (FOI) Request**

Under the FOI Act 2000, please provide the following within **20 working days**:

1. The number of complaints received against Wrexham Council in the last 2 years.
2. The number of those complaints found in favour of the complainant.
3. The number of complaints dismissed because the Council deemed the resident "vexatious."
4. The number of complaints received within Wales in the last 2 years.
5. The number of those Welsh complaints found in favour of the complainant.

#### **Required Timeframes & Escalation**

I expect a substantive response to this review request within **20 working days** (by March 13, 2026).

If you maintain this refusal to investigate, despite the Senedd and Audit Wales both documenting Wrexham Council's lack of engagement, transparency and "blame culture", I will escalate this matter to the **Welsh Government Cabinet Secretary for Finance and Local Government** and the **Information Commissioner's Office (ICO)**.

Yours sincerely,

**Steve Gittins**  
Lead Petitioner (P-6-1510)

# Rebuttal of Document '260306 Enovert Committee'

This analysis deconstructs the correspondence from Enovert, highlighting a strategy of **institutional inertia** and **regulatory shielding** designed to prioritize permit compliance over public safety and modern environmental standards.

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## 1. Retroactive Data Manipulation and Lack of Transparency

Enovert admits that AQmesh pods were only calibrated in October 2025, after which "correction factors" were applied to historical data. They claim all subsequent data has been calibrated accordingly.

- **The Campaigner's View:** This is a transparent attempt to move the goalposts. By applying "corrections" to past data, the operator is essentially grading its own exam. Any spikes in toxic emissions that occurred before October 2025 can now be "adjusted" away to fit a more favorable narrative.
- **Data Transparency:** Despite three formal requests for Enovert to share the **RAW data**, the operator has consistently prevaricated. They have condescendingly declined these requests by claiming that releasing such data to "non-professionals" would "**cause unnecessary anxiety**," despite repeated reassurances that the community has an independent professional standing by to review the figures. This gatekeeping suggests they are more interested in controlling the narrative than being honest with the public.

## 2. Strategic "Buck-Passing" and Bureaucratic Evasion

The operator argues that implementing key safety recommendations (3, 5, 6, and 7) would require legislative changes by the Welsh Government and formal permit variations by Natural Resources Wales (NRW). They emphasize that these changes are not currently requirements of the Hafod Landfill Site permit.

- **The Campaigner's View:** This is a classic case of **bureaucratic evasion**. By insisting they cannot act until the law forces them to, Enovert is hiding behind an antiquated permit that fails to meet modern environmental practices or address the realities of climate change. Instead of taking proactive responsibility as a "good neighbor," they are passing the buck to regulators to manage "expectations regarding process and delivery timescales".

## 3. Denial of Basic Science

Enovert makes the staggering claim that their review "identifies no such correlation" between rainfall events and increased Hydrogen Sulphide ( $H_2S$ ) emissions.

- **The Campaigner's View:** This statement is an affront to both basic landfill science and the lived experience of every resident who smells the site after a downpour. To suggest that water entering a landfill does not increase leachate and gas release is to deny physical reality.

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## The Science: Why Enover's Claim is Fictional

The link between rainfall and  $H_2S$  is a globally documented phenomenon that Enover appears to be ignoring:

- **The "Piston Effect":** As rainwater infiltrates the landfill, it physically displaces gases trapped in the waste pores. This "piston effect" forces concentrated pulses of  $H_2S$  out of the surface and into the community.
- **Biological Acceleration:** High moisture content is the primary driver for anaerobic bacteria. Increased rainfall leads to higher leachate levels, which provides the perfect medium for the chemical reactions that produce  $H_2S$ .
- **Global Evidence:** The **US Environmental Protection Agency (EPA)** and the **UK Environment Agency** both acknowledge that moisture management is the single most important factor in controlling landfill gas. Denying this correlation suggests that Enover's data collection is either deeply flawed or intentionally narrow.

### 4. False Engagement

Enover claims to remain "fully engaged" with stakeholders and liaison groups.

- **The Campaigner's View:** True engagement would involve voluntarily upgrading site practices to meet 2026 standards. Instead, Enover's letter reveals a company that will do the absolute bare minimum, hiding behind the fact that modern safety recommendations "are not currently requirements of the Hafod Landfill Site permit". This is not cooperation; it is **regulatory capture** designed to keep a failing site open at the expense of the public.

**Steve Gittins**

**Lead Petitioner – P-6-15-10.**

# Rebuttal of NRW's Petition Committee Hafod Report

This document serves to discredit the regulatory stance of Natural Resources Wales (NRW) regarding the Hafod Landfill, specifically addressing their refusal to implement modern, enforceable standards that reflect the 20-year distress of the Johnstown community.

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## 1. Failure to Implement Enforceable H<sub>2</sub>S Thresholds

The single most critical issue for residents—the fugitive emission of Hydrogen Sulphide (H<sub>2</sub>S) beyond the site perimeter—remains unaddressed by enforceable permit conditions.

- **Rejection of WHO Standards:** NRW has rejected the inclusion of H<sub>2</sub>S limits in the environmental permit, despite acknowledging that concentrations exceeding  $7 \mu\text{g}/\text{m}^3$  produce "substantial complaints".
- **Antiquated Permit Framework:** While the operator must report H<sub>2</sub>S levels, there is currently **no compliance limit** set in the permit. NRW continues to prioritize "site management" over the atmospheric reality experienced by residents.
- **Ambient Breaches:** NRW admits that in similar cases, such as Walley's Quarry, monitored levels frequently exceeded WHO odour annoyance guidelines, creating a "significant discrepancy" between regulatory data and the "lived experience" of the community.

## 2. Denial of Climate and Rainfall Correlations

NRW's response downplays the urgent need for site-specific data regarding the intensification of rainfall and its direct impact on leachate and gas production.

- **Refusal to Investigate:** Despite the Petitions Committee's recommendation, NRW stated they "**do not consider this necessary**" to undertake a specific study at Hafod to link rainfall to elevated H<sub>2</sub>S production.
- **Leachate and Infiltration:** NRW acknowledges that increased rainfall reacts with sulfur-bearing materials to produce H<sub>2</sub>S, yet they rely on the operator's existing, criticized management plans rather than new, rigorous scientific oversight.
- **Infrastructure Risks:** The operator's own assessment admits that extreme rainfall leads to "increased infiltration and associated leachate generation," yet NRW remains "satisfied" with current mitigation efforts.

### 3. Reluctance to Adopt Best Practice & Digital Monitoring

NRW demonstrates a clear resistance to implementing transparent, high-tech monitoring solutions that would provide residents with verifiable data.

- **Avoidance of Digital Best Practice:** There is a documented reluctance to mandate automated, digital monitoring. NRW claims the "mechanics" of such a system are too "complex" and cite concerns over their own "remit and resources".
- **Inadequate Tooling:** While NRW is purchasing an Optical Gas Imaging Camera, they explicitly admit it "**won't measure H2S,**" the primary chemical causing community distress.
- **Subjective Oversight:** NRW continues to defend the use of "sniff tests" and admits they have no defined requirement for the regular retesting of officers' olfactory competence.
- **Data Integrity Issues:** Residents have rightfully questioned the validity of monitoring data produced by consultants (Geotechnology) who are funded directly by the operator, Enovert.

***Steve Gittins***

***Lead Petitioner – P-6-1510***

# Rebuttal of Wrexham Council's Report and claims of Oversight

## 1. Technical Obfuscation: Calibration vs. Raw Data

The Council emphasizes the "**full calibration and re-scaling**" of the six AQMesh pods. While framed as a technical achievement, this serves to justify why the original reports were adjusted and updated on three separate occasions. This focus on "calibrated data" creates a technical barrier that masks a lack of transparency: while the Council claims they do not have the raw data, Enovert continues to refuse its release for independent analysis.

## 2. Stagnant Engagement: The NRW Citizens Webpace

The letter leans on Recommendation 8, citing the publication of Air Quality Summary reports on the **Natural Resources Wales (NRW) Citizens Webpace**. However, the Council's reliance on this platform as a tool for "active" engagement is contradicted by the reality of the data:

- The "last update" on the site was in **November 2025**.
- The Air Quality Summary Report was last posted in **August 2025** (over six months ago).
- The last Newsletter was issued in **July 2025**.

Instead of proactive communication, this represents a **recirculation of stagnant rhetoric** that fails to keep residents informed.

## 3. Curating the Opposition: Stakeholder Membership

Regarding Recommendation 10, the Council states it will work with Enovert to "**clarify membership criteria**" for the Hafod Liaison Group. Allowing the operator to define who is "eligible" to hold them accountable suggests a **carefully curated panel** rather than an independent community watchdog. This ensures that "participation" remains within parameters defined by the very entities being scrutinized.

## 4. Abdication of Statutory Responsibility (EPA 1990)

The Council's response to Recommendation 4 is a pivot away from their legal obligations. They express disappointment with the recommendation, arguing that the focus should be on NRW's environmental permitting rather than the **statutory nuisance provisions** of the **Environmental Protection Act 1990**. By framing themselves as "not the primary regulator," Wrexham Council is effectively **marginalizing their own enforcement powers**, delegating their local responsibilities to a national body.

## 5. Discrediting "Complaint Fatigue" and the "Sniff Test"

The Council attempts to dismiss "complaint fatigue" by claiming their "proactive" monitoring and officer "**sniff tests**" make them likely to be aware of issues without resident input. However, this claim is undermined by several factors:

- **Lack of Training:** By NRW's own admission, these "sniff testers" were not actually trained for the role until the commencement of this inquiry.
- **Subjectivity:** These tests remain a "subjective" metric compared to the lived experience of residents.
- **Artificial Suppression:** By claiming they "already have comprehensive data," the Council discourages further reporting, thereby suppressing complaint numbers to falsely suggest the issue is resolved.

## 6. Conclusion

Wrexham Council's insistence on the 'calibration' of monitors serves only to distract from the reality that raw data is being withheld from independent scrutiny, leaving residents to rely on 'Summary Reports' that haven't been updated in over half a year. Their response to Recommendation 4 reveals a calculated marginalization of their own duties under the EPA 1990, choosing to defer to the NRW rather than exercise their local enforcement powers—all while relying on 'sniff tests' conducted by staff who, by the regulator's own admission, weren't even trained for the task until this inquiry began.

Ultimately, **both Wrexham Council and NRW have mastered the art of disruptive rhetoric to mask systemic inertia, gift-wrapping the status quo in the language of a revolution and a new dawn, when nothing has changed or improved for over 20 years.**"

**Steve Gittins**

**Lead Petitioner : P-6-1510**

## **Petitioner to Committee, 20 January 2026**

I am writing to thank you for your work as a member of the Senedd Petitions Committee in relation to Petition P-06-1510 concerning Hafod Landfill. I received a 'media embargo' copy of your deliberations and findings yesterday, and I am looking forward to 'share' this report with my residents and campaigners.

Whilst we are disappointed that the revocation of the permit has not been implemented, campaigners and local residents greatly appreciate the seriousness with which the Committee has examined the concerns raised and the recommendations that have been made.

The Committee's work has been vital in ensuring that community voices are heard at a national level.

As we move towards the election period, we respectfully ask for your continued support in, ensuring that the Committee's recommendations are not lost or delayed, encouraging Welsh political parties to commit to these recommendations in their manifestos, and maintaining public and governmental focus on the Hafod Landfill issue

Your role has already made a meaningful difference, and we hope we can continue to rely your support to ensure that real and lasting change follows.

Interestingly, during my continued research, I found that the location of Hafod Landfill (within 100 - 200 metres, of residential areas) would not pass current modern day permit and planning regulations.

Thank you again for your work and commitment. We will, of course, continue to hold Enover, NRW, Wrexham Council to account.

Best wishes for your campaigns, at the Seventh Senedd.

Kind regards,  
Steve Gittins

## Petitioner to Committee, Legacy Statement, 3 February 2026

**Subject: URGENT: Ensuring Accountability for the Hafod Landfill Senedd Inquiry Report (P-06-1510) – Legacy Statement**

**To:** The Petitions Committee Clerk, Senedd Petitions Committee

**Dear Clerk, Carolyn Thomas,**

I am writing on behalf of the residents regarding the final report for Petition **P-06-1510**, *"Direct NRW to revoke the environmental permit and ensure the closure of Enover's Hafod Landfill Site in Wrexham."*

### **A Message of Gratitude**

Firstly, we wish to express our sincere gratitude to all members of the Petitions Committee for their diligence and thoroughness throughout this inquiry. For many years, our community has felt "ignored" and "fobbed off" by the organizations tasked with our protection. Seeing our experiences reflected in the final report has provided a profound sense of vindication. We truly feel that, through this Committee, our voices have finally been heard at the highest level of Welsh governance. We also believe that this injustice has escalated to a National agenda, given the messages I have received from other Landfill campaigners, past and present.

### **Addressing the Modern Regulatory Gap**

A key takeaway from this process, which we wish to emphasize, is that current landfill permits and regulatory frameworks are increasingly **inadequate for the modern day**. As we face the realities of **climate change**, including increased frequency of heavy rainfall events, the link between environmental conditions and hydrogen sulphide (H<sub>2</sub>S) production has become undeniable. The existing system is failing to keep pace with these shifting environmental pressures, leaving communities vulnerable.

### **Ensuring a Seamless Transition (Legacy Statement)**

As we approach the dissolution of the Sixth Senedd, it is imperative that the findings of this inquiry are not lost during the transition to the Seventh Senedd in May 2026. The community cannot afford "complaint fatigue" or a lapse in oversight.

The report's eleven critical recommendations offer a roadmap to rectifying an unacceptable status quo. We specifically highlight the need for:

- **Automated Monitoring:** Mandatory, calibrated odour monitoring to replace subjective assessments.
- **Regulatory Reform:** A fundamental review ensuring that persistent odour and leachate failures act as automatic triggers for permit revocation.
- **Transparency:** Direct resident representation on the Hafod Stakeholder Group to restore shattered public trust.

## Formal Assurances Required

To ensure the "mantle" is successfully taken up by the next Parliament, we seek formal assurances that:

1. The **eleven recommendations** will be formally adopted into the work programmes of the Welsh Government and relevant local authorities.
2. **Natural Resources Wales (NRW)** will immediately implement enhanced staff training and investigate the correlation between extreme weather/rainfall and landfill emissions.
3. A **formal handover process** is established to ensure the Seventh Senedd maintains continuity of oversight without delay.

For nearly 20 years, the people of Johnstown have lived behind closed windows, enduring a "rotten egg" stench that has reached crisis levels. We are seeking nothing more than our fundamental right to clean air and environmental accountability.

**We look forward to your prompt response and a written commitment to the future of our community's health and well-being.**

Yours sincerely,

Steve Gittins  
Lead Petitioner

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

3<sup>rd</sup> February 2026

**Petitioner to Deputy First Minister, 11 March 2026**

Steve Gittins Lead Petitioner – P-6-1510 Hafod Landfill Campaigners

**March 11, 2026**

**Huw Irranca-Davies MS**

Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs Welsh Government

5th Floor,

Tŷ Hywel

Cardiff Bay,

CF99 1NA

**Dear Sir,**

**RE: Formal Appeal: Rejection of Recommendation 5 – H2S Permit Thresholds**

**Dear Cabinet Secretary,**

The residents of Johnstown and the surrounding areas, supported by the Hafod Landfill Campaigners, formally appeal the Welsh Government's decision to **reject Recommendation 5**. This recommendation, which seeks the inclusion of hydrogen sulphide Hydrogen Sulphide measurement criteria within environmental permit conditions, is the most pivotal element of this inquiry.

The current regulatory stance represents a **national blind spot** that allows operators to treat fugitive emissions into local communities as an unmeasured, and therefore "non-existent," byproduct of landfill operations.

### **1. The Fallacy of the "Occasional Surrogate"**

Natural Resources Wales (NRW) argues that because \$H\_2S\$ might not be the *only* odorous chemical present, it is an unreliable metric for permit conditions. This logic is fundamentally flawed:

- **The Fire Analogy:** Refusing to measure \$H\_2S\$ because other gases might exist is equivalent to refusing to measure smoke during a fire because other particulates are present.
- **Identifiable Nuisance:** The community consistently reports a "rotten egg" odour. Science universally recognizes \$H\_2S\$ as the source of this specific stench.
- **Regulatory Avoidance:** By claiming they do not know "what to test for," regulators are ignoring the very chemical they admit is produced by gypsum-bearing waste.

### **2. Misinterpretation of WHO Guidelines**

NRW cites the World Health Organization (WHO) to justify its rejection, but the application of this data is disingenuous:

- **The Threshold of Complaint:** The WHO states that concentrations exceeding  $7 \mu\text{g}/\text{m}^3$  are likely to produce substantial complaints.
- **Weaponizing Uncertainty:** Instead of using this  $7 \mu\text{g}/\text{m}^3$  figure as a clear, enforceable regulatory "red line," NRW uses the WHO's scientific nuances to argue against having any threshold at all.
- **Community Data:** Independent AQMesh monitoring has already shown that H<sub>2</sub>S levels in the community exceeded these WHO guidelines **37% of the time**.

NRW's refusal to adopt these standards into the permit is a choice to remain blind to documented public health nuisances.

### 3. The "Ad-Hoc" Failure

NRW points to "ad-hoc" monitoring under the site's Odour Management Plan as a sufficient safeguard.

- **Lack of Accountability:** "Ad-hoc" monitoring at the operator's discretion is not regulation; it is a courtesy.
- **Two Decades of Failure:** This approach has been the status quo for nearly 20 years, during which the community has been subjected to persistent, debilitating odours.
- **Need for Mandates:** Without mandatory, automated monitoring and enforceable permit limits, the operator has no legal incentive to prevent fugitive emissions from crossing the site perimeter.

### 4. A National Issue of Environmental Justice

This is not an isolated technical dispute; it is an issue affecting every landfill site across Wales.

- **The Perimeter Gap:** Current regulation focuses on management *inside* the fence (waste inputs and capping). It fails to account for the impact *outside* the fence, where residents actually live and breathe.
- **The Digital Solution:** We urge the Welsh Government to mandate the use of **digital \$H\_2S\$ handheld devices** and fixed automated monitors that record concentrations with GPS and time-stamping to create an immutable record of permit breaches.

### Conclusion

The rejection of Recommendation 5 preserves a regulatory vacuum. It allows NRW to claim "insufficient evidence" while simultaneously refusing to gather the very evidence needed to prove a breach.

Fugitive Hydrogen Sulphide (H<sub>2</sub>S) odours migrating beyond the landfill boundary are the core grievance of this campaign. The current permit regulations, now over 36 years old, are a relic of a previous era. They fail to reflect the complexities of modern waste composition or the volatile impacts of climate change on gas migration.

We request that the Welsh Government reconsider this rejection and direct NRW to establish clear, enforceable H<sub>2</sub>S thresholds within the Hafod Landfill permit to protect the health and dignity of our community.

Yours sincerely,

**Steve Gittins** Lead Petitioner – P-6-1510