

Consultation on our regulatory fees and charges for 2025/26

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What we are consulting on

We would like your views on our proposed charges for our regulatory fees and charges from 1st April 2025. We will use your feedback to inform our new charging schemes, which we propose to implement from 1st April 2025 subject to Welsh Government approval.

This consultation closes at 23:59 on Sunday 12th January 2025.

About Natural Resources Wales

Our purpose is to pursue the sustainable management of natural resources. This means looking after air, land, water, wildlife, plants, and soil to improve Wales's wellbeing, and provide a better future for everyone.

We believe that we need to use natural resources in a way and at a rate, that maintains and enhances the resilience of ecosystems and the benefits they provide, meeting the needs of current generations of people without compromising the ability of future generations to meet their needs.

Our role in regulation

Everybody wants our environment to be well managed and maintained, for present and future generations. More than ever, there is a need to protect our environment, minimise the effects of climate change and stop the decline of habitats and wildlife. NRW policies reflect this.

We have a wide remit that includes providing a range of regulatory services. These regulatory services provide a foundation that prevents environmental harm and provides a level playing field where well managed businesses are not undercut by poor operators in the same sector. We assess and issue permits, set conditions to protect the environment, and monitor how legislative standards are being met, which are key to supporting a high-quality environment.

We take an evidence-based approach to determining risks to the environment. Our decisions are underpinned by evidence and the decisions we take support our response to the nature and climate emergencies we currently face.

Our approach to regulation focuses our effort on areas of greatest environmental risk, which is decided by the activity being undertaken and its proposed location. We help make sure those we regulate comply with their permit and licence conditions. Where these are breached, we have a range of actions available to us including prosecution.

Funding our regulatory approach

Our regulatory responsibilities are funded either by grants from Welsh Government (Grant in Aid) or, where we have legal powers to charge, by charges levied on those we regulate.

Welsh Government requires us, under [Managing Welsh Public Money](#)¹, to fully recover the costs of providing our regulatory services from those we regulate, where possible, rather than those services being funded by general taxation. We also need to ensure that income from our fees and charges in each area is only used to provide that specific regulatory service.

The amount of resource and regulatory effort we apply to an activity is driven by factors and thresholds set out in legislation and our policies. This produces a range of different control mechanisms depending on the risk of the activity. These include exclusions, exemptions, licences, consents, assents, and permits. This hierarchy of risk and the actions we take as a result are different for each regime. The higher the environmental risk of an activity, the more of our time and resources need to be focused on that area. That

¹ [Managing Welsh public money | GOV.WALES](#)

increase in time and resources is then reflected in the cost of providing that service – the more NRW effort needed, the higher the charge.

In determining our charges, we look at the service we provide and review our ways of working to ensure processes are as efficient as possible.

Our charges for permitting and subsistence (annual compliance) activities are in line with the ‘polluter pays’ principle, meaning that applicants are responsible for covering the cost to NRW of determining a permit application and assessing their compliance with the protective conditions. This approach is in line with Section 3 of the Regulators’ Code² and our Regulatory Principles³.

Any enforcement work we undertake is funded by ‘Grant in Aid’ money provided by Welsh Government. Any fines issued by the Courts from a prosecution brought by NRW are paid to HM Treasury rather than NRW.

The fees and charges raised to cover the costs of our regulatory activities account for approximately 17% of our total 2024/25 funding. Our current charging schemes can be found on our website⁴.

This set of charge proposals for 2025/26 involves a review of a small number of specific charges and deals with inflationary or forecast deficit pressures which ensures we manage our funding sustainably.

We review our permitting charges every year to ensure that they are accurate and have started a broader review of subsistence (annual compliance) charges to ensure we are adequately funding the service we provide. That way, we are sustainably funded to perform our regulatory duties and are aligned to [Managing Welsh Public Money](#) policy.

Annual review of charging for 2025/26

We have undertaken a review of our charges. This review has been guided by our charging principles:

- Charges are based on us recovering the full cost of providing our services (for permit applications and subsistence (annual compliance assessment)).
- We have been transparent in how we have made our charging decisions.
- Our charges do not cross-subsidise between regimes – charges pay for the services provided within that regime.
- Support longer-term planning horizons wherever possible.
- We try to avoid cutting then raising charges by actively managing our surpluses and deficits.
- We have kept charges as low as possible through a continued drive for increased efficiency.
- We do not profit from charge payers, and

² [Regulators’ Code \(publishing.service.gov.uk\)](#)

³ [Natural Resources Wales / Our Regulatory Principles](#)

⁴ [Natural Resources Wales / Our charges](#)

- we aim to be independent of taxpayer subsidies.

For the period from 1st April 2025, we are proposing to maintain as far as possible our existing regulatory charges. However, we do need to adjust some charges to ensure we manage ongoing inflationary pressures and manage deficit pressures for specific regimes, as well as introducing new areas of charge as a result of legislative and technical drivers.

A more in-depth review has concentrated on the following areas:

- **UK Emissions Trading Scheme (UK ETS)** – review of our current permitting and subsistence (annual compliance) charges and proposed new charging areas.
- **EPR Waste Standard Rules** – introduction of tighter controls through three new Standard Rule Permits (SRPs) with associated permitting and subsistence (annual compliance) proposals, amendments to existing SRP's and removal of waste exemptions.
- **Green List Waste (GLW)** – New regulatory duties coming to NRW relating to Green List Waste shipments for which NRW can propose new charges for cost recovery.
- **Hazardous Waste Premises Notification Charge** – proposal to reduce the charge to zero to manage existing surplus.
- **Water Industry Act (WIA) s166 a/b 5-year Scour valve release renewals** – introduction of charges for the 5-year renewals (including Habitats regulations assessments). These proposals affect water companies only.
- **Water Resources – Same / Different terms renewals** need to be more clearly defined to ensure some same-terms renewals are fully cost recovered.
- **Species Licencing** – new charge proposals and applicability of waivers with the use of Grant in Aid to subsidise certain applications.
- **General Increases** that cater for ongoing cost pressures and regime deficit management.

Our proposed regulatory fees and charges for 2025/26

We propose to increase the amount of money we collect from our charging schemes to ensure they reflect full cost-recovery, to deliver our regulatory approach and the outcomes needed for the Welsh environment and green recovery.

It would not be appropriate to seek additional Grant in Aid funding for regulatory activities that should be covered by charges, and we cannot cross-subsidise from other income streams. When proposing new fees and charges, we follow the requirements set out in [Managing Welsh Public Money](#) as well as HM Treasury rules and our legislative obligations, ensuring that only eligible costs are included within calculations.

We recognise the financial impact our charging proposals might have on some business sectors, especially as our proposals coincide with wider financial pressures from inflation and the increased cost of living. However, a failure to manage our charging schemes to ensure they reflect full cost recovery would impose significant resource implications, a reduction in our technical skill base and, therefore, an inability to ensure that our natural resources are sustainably maintained, enhanced, and used, now and in the future.

UK Emissions Trading Scheme

NRWs UK Emissions Trading Scheme (UK ETS) is expected to be in deficit by -£0.4m by the end of 2024/25.

We need to amend our charges to recover this deficit and to ensure that our charges going forwards reflect the cost of work and complexity undertaken by NRW.

The following table shows our proposals for 2025/26. This includes new charge proposals for additional sub-installations at a site introduced by Activity Level Reporting which add complexity and requires additional effort to review and determine.

UK Emissions Trading Scheme proposals 2025/26			Current Charges	Proposed 2025/26 charge
Subsistence⁵				
UK ETS subsistence charges for installations in Wales				
Installation	Installation category (as per your permit)	Number of Sub-Installations		
HSE Installations	Hospital or small emitter	N/A	£539	£2,306
Installations (no free allocation)	Cat A - Emitting less than 50,000t CO2e per annum	N/A	£2,154	£2,797
Installations (no free allocation)	Cat B - Emitting at least 50,000t and no more than 500,000t CO2e per annum	N/A	£3,770	£3,192
Installations (no free allocation)	Cat C - Emitting more than 500,000t CO2e per annum	N/A	£4,307	£3,586
Installations (free allocation)	All Categories	1 to 2	As per above charges, dependant on category	£7,486
Installations (free allocation)	All Categories	3+	As per above charges, dependant on category	£15,867
Permitting New				
UK ETS new permit charges for installations in Wales:				
Installation	Installation category	Number of Sub-Installations	Current Charges	Proposed 25/26 charges
HSE Installations	Hospital or small emitter	N/A	£2,032	£5,698
Installations (no free allocation)	Cat A - Emitting less than 50,000t CO2e per annum	N/A	£2,032	£5,698
Installations (no free allocation)	Cat B - Emitting at least 50,000t and no more than 500,000t CO2e per annum	N/A	£3,048	£7,597
Installations (no free allocation)	Cat C - Emitting more than 500,000t CO2e per annum	N/A	£4,064	£9,496

⁵ Annual subsistence charges based on category as defined in permit.

Installations (free allocation)	All Categories	1 to 2	As per above charges, dependant on category	£13,294
Installations (free allocation)	All Categories	3+	As per above charges, dependant on category	£15,193
Permitting Variation⁶				
Installation	Type of permit change		Current Charges	Proposed 25/26 charges
All	Administrative Variation ⁷		£0	£375
All	Minor Variation ⁸		£0	£1,140
Installations (no free allocation)	Significant Variation ⁹		£1,016	£4,558
Installations (free allocation)	Significant Variation ¹⁰		£1,016	£6,457
All	Increase emissions target (HSE capacity increase)		£2,032	£5,698
All	New entrant reserve		£3,048	£7,597
Permitting Transfer/Surrender/Revocation				
Installation	Type of permit change		Current Charges	Proposed 25/26 charges
All	Permit transfer		£2,032	£5,698
All	Permit surrender		£2,032	£5,698
All	Permit revocation		£2,032	£5,698

As well as the above proposals, we propose new charges for:

1. Administration of Civil Penalty Notices (CPNs) – fixed fee £375

Under Article 35 of The Greenhouse Gas Emissions Trading Scheme 2020 Order (SI 2020/1265), NRW has the power to recover costs relating to CPN's and other enforcement costs.

Our proposal seeks to directly recover the one-off administrative cost of giving the CPN to the operator.

2. Pre-application charges - £125/hr

This discretionary service is dependent on available capacity and the proposal is consistent with other regulatory regimes and charged at the standard regulatory hourly rate¹¹.

3. Ultra Small Emitter baseline data collection - £125/hr

For emissions <2,500t CO2e per annum that don't require a permit but still need to be monitored. Also charged at the standard regulatory hourly rate.

4. Addition of a new activity to a permit will be charged as a new application

⁶ same charges apply where variation is regulator-initiated (and no application made by operator).

⁷ We propose to introduce a new chargeable activity for all minor administrative variations. These require no technical input, for example a change in company registered address.

⁸ A permit variation which is not purely administrative but doesn't meet the legislative definition of a significant modification.

⁹ A significant modification to a monitoring plan or monitoring methodology plan.

¹⁰ A significant modification to a monitoring plan or monitoring methodology plan.

¹¹ For reference, we already charge at £125/hr for determining reportable emissions.

For example, adding a carbon capture activity. This will be charged at the new application fee associated with the category of the new activity only, and not the installation as a whole.

5. First-of-a-kind applications will be charged a standard application fee plus a supplementary hourly rate (where relevant)

We propose to charge any first of a kind (e.g., carbon capture & transport) at the standard application fee plus a supplementary hourly rate (where relevant).

EPR Waste Standard Rules

We have created three new waste Standard Rules Permits (SRPs) for tyres, mattresses, and recyclable waste.

As a result of reforms to waste exemptions being carried out by Government to improve compliance with exemptions and reduce waste crime, we expect that more activities will need to be regulated by environmental permits. For example, the withdrawal of the T8 exemption means anyone treating tyres will need a permit in future.

We believe these new standard rules permits will help some operators to transition from the exemptions regime to the permitting regime. They are aimed mainly at operators of waste sites currently operating under exemptions T8 (tyre recycling), T12 (for mattress recycling) and T4 (for paper, cardboard, and plastic baling).

The 3 new standard rules sets are:

- SR2024 No 02 - Waste mattresses for recovery to replace the T12 exemption.
- SR2024 No 03 - Waste tyres for recovery to replace the T8 exemption.
- SR2024 No 04 - Waste paper, cardboard, and plastic for recovery to replace the T4 exemption.

The charges proposed for these three new SRPs are in line with similar existing SRPs but will be subject to the proposed inflationary or deficit risk management increases in 2025/26, given the overall deficit position of EPR Waste regime.

- Application base charge of £1,893 +3% = £1,950. Our existing additional fees will apply if we need to review any plans and assessments as part of the application.
- Transfer £1,858 +3% = £1,914
- Minor technical variation £2,888 +3% = £2,975
- Admin variation £717 +3% increase = £739
- Subsistence (annual compliance monitoring) £2,669 +8.5% = £2,896

The charges for existing SRPs can be found in our existing charging scheme (see table F10b onwards in the [EPR charging scheme document](#) on Page 34).

Green List Waste- Article 18 of the retained Waste Shipments Regulation

In anticipation of NRW having new regulatory duties for article 18 of the retained [Waste Shipments Regulation](#) also known as 'Green List Waste' controls (GLW), and powers to produce a charging scheme for this new work. The charge we propose to levy for GLW will recover the cost of our future regulatory activities for this waste stream.

Currently GLW is a self-regulated system and means exporters and importers are not required to pay fees to cover our regulatory compliance activity or submit [Annex VII forms](#) (notifiable waste only). NRW does not currently have a charging scheme in place for GLW.

The proposed charge will be an annual up-front fee similar to how NRW currently charge for [Notified Waste Shipments](#). The annual fee will be calculated for the total number of GLW shipments made per financial year 1st April to 31st March. This option will provide NRW with the simplest form of charging for Green List Waste Shipments and provide a consistent approach between both Waste Shipment controls.

Once the regulatory requirements are implemented through legislation, the charge will be taken via BACS, the same method as the current Notified Waste Shipment payments.

To provide an indication of the proposed charges, 2025/26 are shown in the table below.

Article 18 Green List Import & Export Shipment Charge (2025/26)

Band	No. of Shipments per financial year (1 st April to 30 th March)	Rate
A	1 to 5 shipments	£250
B	6 to 20 shipments	£1,000
C	21 to 100 shipments	£4,500
D	101 to 300 shipments	£6,500
E	301 to 500 shipments	£9,500
F	501 to 1,000 shipments	£11,500
G	More than 1,000 shipments	£16,500

How we define a single shipment

Waste exports and imports are called shipments. NRW is responsible for regulating shipments of waste to and from Wales. Waste exporters and importers have interpreted the definition of 'a single shipment' differently, resulting in some sending large quantities of waste as a single shipment and others sending smaller amounts. Larger shipments require increased regulatory effort. We are proposing a new definition to ensure that NRW is consistent with other UK regulators' definition of shipment, to provide clarity for business and to ensure we will cost recover the correct fees and charges.

We propose defining a 'single shipment' for charging purposes as:

- one shipping container
- one lorry trailer
- a bulk shipment, where the waste is transported in a ship (and the waste is not in shipping containers or in lorry trailers while on the ship or at any point during the shipment while in the United Kingdom)
- one ship (where the waste is a ship)
- one offshore installation, or part of an offshore installation (where the waste is an offshore installation or part of an offshore installation)
- start from the same load site.

For Notified Movements, the waste in each shipment must:

- have the same physical and chemical characteristics.
- start from the same load site.
- move to the same destination.
- use the same route.

You need to tell us how many shipments you intend to make and the planned first and last dates for shipments.

You will have up to 12 months from the date of consent to complete the shipments, or up to 3 years if the destination facility has pre-consented status.

Hazardous Waste Premises Notification

Hazardous Waste Premises Notification is the requirement under Hazardous Waste Regulations (Wales) 2005 for anyone producing more than 500kg of hazardous waste in a year to register their details with NRW. This provides NRW officers with the details of producers in Wales which enables us to effectively target our compliance effort.

In previous years, we have charged £18 per site to register if payment is made online via NRW's website, £23 per site for telephone registration via NRW's customer hub team or £28 per site to register in writing.

We regularly monitor the revenue brought against the cost of providing our services. We have identified an ongoing surplus in this area. To manage this, we propose to reduce the registration fee to £0 from April 1st, 2025. Producers will still have the requirement to register with us.

Water Industry Act s.166 consents – 5-Year scour valve release renewals

In July 2023 as part of our Strategic Review of Charging, we introduced chargeable s166 a and b Water Industry Act (WIA) consents. This covers water company activities that needed to discharge treated, or untreated, water into a watercourse from a pipe greater than 229mm in diameter. These were previously funded by Grant in Aid.

For 2025/26, we propose introducing a charge for 5-year bi-annual scour valve release renewals, which again solely relate to water companies.

Existing charges are:

- £796 for a single water discharge (s166a)
- £1,298 for multiple water discharges from one site only (s166b).

A Habitat Regulations Assessment may also be required. The current charge is £649 to complete a single Habitat Regulations Assessment. Several assessments may be needed if there are multiple European protected sites likely to be affected by the proposal.

In respect of WIA s166 Scour valve safety test 5-year renewals, we propose:

- A charge of £820 (£796 +3% inflationary increase) for a single water discharge (carried out bi-annually) from a single site only on one consent.
- A charge of £1,337 (£1,298 +3% inflationary increase) for multiple water discharges from a single site on the same consent.

Each additional discharge at other sites listed on the same consent will each be charged at 10% of the single water discharge rate (£82).

Where a Habitat Regulations Assessment is required, there is an existing charge of £668 (£649 +3% increase) and this will be per assessment for each of any affected European protected sites.

Water Resources - Same / Different terms renewals

We have refined how we define simple and complex renewals as a result of under-recovery on same-term renewals. We are proposing to apply the lower simple variation fee (currently £1,398) to the following areas:

- same terms renewal (where no environmental or other concerns have been raised in your renewal reminder letter)
- different terms renewals (where the change is a reduction, meaning a reduction in volumes or removal of a point/purpose and associated volumes).

For renewals that don't meet the criteria above, we are proposing that these are charged at the same rate as a technical variation (currently £4,955), and will include:

- increasing the quantities you abstract
- changing the location of the abstraction

- change of purpose
- changes to drawings and maps attached to the licence document.

As these are existing charges, these proposals will also be subject to inflationary increases for 2025-26, given the current forecasted deficit position of the Water Resources regime.

Therefore, the simple variation proposal will be $£1,398 + 3\% = £1,440$, and the technical variation proposal will be $£4,955 + 3\% = £5,104$.

Species Licensing

We introduced new charging through our Strategic Review of Charging in 2023 and undertook to waive charges in certain cases to support wider benefits. Since their introduction we have identified complexity in certain types of licence and the need for greater clarity of waivers and where they apply. We are proposing new charges and refinement of the associated waivers for 2025/26 meaning the following activities will now be charged for. Waivers will only apply where in our view they meet the principal objective of the waiver.

The fixed fees already in place will also be subject to inflationary increases (+3%) for 2025/26, as highlighted in the next section.

Householder developments

We are proposing a new fixed charge of £351 for species licence applications associated with home extensions, roof conversions, re-roofing and permitted development within the curtilage of a dwelling.

Amendments will be charged at a fixed rate of $£76 + 3\% = £78$, while more complex amendments will be charged the hourly rate of £125 per hour.

Under our current waiver D, certain household development was subsidised by Grant in Aid. We are proposing to amend Waiver D meaning we will charge for licences where structural alterations or significant disturbance such as re-roofing is taking place however we will not charge for simpler situations such as general maintenance of a domestic dwelling.

Other Activities requiring a Licence

We are proposing a charge of £125 per hour for complex applications where no planning is required or the activity is covered by permitted development such as land clearance, ground investigations, installations of power or telecommunications infrastructure.

Amendments will be charged at a fixed rate of $£76 + 3\% = £78$, while more complex amendments will be charged the hourly rate of £125 per hour.

Bird Control Licences

We propose introducing a new charge of £163 for bird control licences for:

- maintaining the health or safety of the public in commercial buildings, business premises, industrial sites, or groups of more than one dwelling, or.
- preventing the spread of disease in commercial buildings, business premises, industrial sites, or groups of more than one dwelling.

Bird control licences required for these purposes in hospitals, educational facilities and single dwellings will still be exempt from charges under this proposal.

Amendments to the above licences have a fixed charge of £76 +3% = £78 for admin changes such as a change to the licensee, ecologist, accredited agents or to personal details.

All other amendments are considered as complex and will be charged at an hourly rate of £125.

Planned health and safety work

For planned health and safety activities, we propose introducing a charge of £125 per hour for:

- applications where no planning is required or the activity is covered by permitted development e.g., land clearance, ground investigations, installation of power or telecommunications infrastructure, or
- planned or routine Health and Safety work such as maintenance of water, transport, energy, and communications infrastructure.

Amendments will attract a fixed charge of £76 +3% = £78 for admin changes such as a change to the licensee, ecologist, accredited agents or to personal details.

All other amendments are considered as complex and will be charged at an hourly rate of £125.

Species licence charge waivers

The species licensing charging scheme we introduced in July 2023 included four 'charge waivers' that set out circumstances where our effort would continue to be publicly funded through 'Grant in Aid' to manage the risks of unintended consequences and to enable us to deliver our policy objectives.

During our charge review this year, we considered how waivers have been used and have identified areas where a lack of clarity exists, leading our staff to spend significant time either processing complex applications often for major projects for no charge, or engaging with applicants to determine if a waiver applies or not.

We intend to adjust and refine the waivers introduced in 2023 to ensure taxpayer money is targeted only to the following specific cases:

- **Waiver A** Conservation, scientific, research or education – We will not charge for an application for a species licence if you are carrying out not-for-profit survey work or for applications from enforcement agencies such as the Police, who require one to investigate a suspected offence. No fee shall apply where in our view the principal objective is:

- the conservation of that protected species or their habitats
 - the advancement of scientific understanding of protected species or their habitats
 - education related to that protected species or their habitats
 - maintaining or enhancing biodiversity or the resilience of ecosystems
 - maintenance or conservation of scheduled ancient monuments We propose to withdraw the waiver for charges relating to historic buildings.
- **Waiver B** public safety, public health, or the prevention of serious damage to property – We have reviewed and refined this waiver so that it reflects the nature of the application, scale, and criteria. We will waive charges where in our view the principal objective is to:
 - maintain the safety of the public from imminent injury or death
 - to preserve public health from an imminent threat
 - preventing the spread of disease
 - conserving wild birds
 - preventing serious damage to livestock, foodstuff for livestock, crops, vegetables, fruit, growing timber, fisheries, or inland water
 - preserving air safety, or
 - conserving flora and fauna.
- **Waiver C** licences relating to the control of Invasive Alien Species – remains unchanged.
 - **Waiver D** householder maintenance (currently called household development) – We propose to continue to waive charges for species licences required to enable the maintenance of a domestic property used as a primary residence (use class C3) where the work does not require planning consent (the waiver can still be applied if the work requires listed building consent). The waiver does not apply to works carried out under permitted development rights or re-roofing.
 - New **Waiver E** developments to provide facilities and access for disabled people – We propose to introduce a new waiver specifically for the provision of disabled access that was previously contained in Waiver D.

Waivers will only be applied where in our view they meet the principal objective of the waiver.

Our [current species licensing waivers can be viewed on our website](#).

Forecast deficit management

In addition to the above specific proposals, we are proposing the following approach to increases in costs for those regulatory regimes in deficit currently, or forecasting a deficit going forward:

- An +8.5% increase to subsistence (annual compliance) charges in significant deficit that moves towards a break-even position. This applies to:
 - EPR Water Quality, and
 - EPR Waste.

- Specific increases of +6% to subsistence (annual compliance) for charge schemes which would otherwise need a significant increase to get to break-even position by 2027/28. These regimes are subject to longer-term detailed review to give us certainty of full cost-recovery.
 - Water Resources Standard Unit Charge (SUC)
 - Installations (including Medium Combustion Plant Directive [MCPD])
 - Non-Nuclear
 - Materials Recycling Facilities (MRF)
 - Waste Carriers, Brokers & Dealers
 - International Waste Shipments
 - Flood Risk Assessment Permits (FRAPs)
 - Reservoir Safety.

- A +3% increase to permitting areas to absorb inflationary pressures:
 - Water Resources - Abstraction / Impoundment permits
 - EPR Installation permits (including MCPD)
 - EPR Site-Based Waste permits
 - EPR Water Quality permits
 - EPR Non-Nuclear
 - Reservoir Safety
 - Species Licensing.

Other matters to note

This consultation, and the proposals we are asking for comment on have focussed on the changes we are currently proposing to help maintain cost recovery through our charging scheme during 2025/26.

We would like to take this opportunity to make you aware of areas of priority for us to review over the coming years which may impact on charges or our strategic direction.

These are not specific proposals, although we welcome any feedback in consideration of these future areas of review for charging.

1. Subsistence reviews

Having implemented our review of application charges in July 2023, we intend now to review subsistence charges (annual compliance charges). In depth reviews will require an investment of resources and time to look at processes, develop approaches, gather evidence, and build charge schemes so we will be prioritising regimes. Our intention is to initially focus on:

- Water Quality
- EPR Installations
- EPR Waste
- Water Resources
- Nuclear
- Marine Licencing (supporting a Welsh Government review).

In addition, we may consider further extension to the use of compliance rating adjustments beyond waste operations and Tier 2 and 3 installations e.g., for water quality or water resources.

2. Other Charging areas

We will be reviewing or introducing charging for Dee Conservancy and Dee Cockles.

Rod licence duties in Wales are also due to increase from April 2025 by +3%. These annual increases were approved in 2023 following [advertisement](#) in 2022, covering 2023 – 2025.

We are also proposing +3% increases to net licences from April 2025 covering ten estuaries in Wales (Cleddau, Conwy, Dyfi, Dysynni, Mawddach, Nevern, Taf, Teifi, Tywi, and Wye). This is in line with increases to rod licence duties and other NRW permits/licences proposals from April 2025 and will be advertised separately in due course.

3. The Water (Special Measures) Bill

The Water (Special Measures) Bill has indicated ambitions to strengthen NRW's regulatory powers to address water pollution caused by sewage discharges and aging infrastructure, which will support our ongoing efforts to drive much needed improvements in water company performance in Wales. The provisions in the Bill will address a gap in NRW's enforcement capabilities by enabling sanctions to be imposed in the form of automatic penalties for specific water industry offences. This will enable the regulator to impose penalties more quickly, without having to direct significant resources to lengthy investigations, for certain categories of offences. We will consult on development of a charging mechanism if one is needed.

4. Enforcement

Our enforcement activity, while a fundamental part of our regulatory activity to protect our natural resources in Wales, is funded through Grant in Aid. This means our resources are under pressure and we are not always able to tackle all offending with existing approaches. It is essential that we consider the whole range of tools available to seek and secure alternative sources of funding and resources, outside of Welsh Government Grant in Aid, to strengthen our enforcement capability. We will be scoping new cost recovery models for waste incident, interventions, and enforcement, under Section 64 of the Environment Act 2021 (commencement No.1 and saving provision) (Wales) Regulations 2022

5. Felling Licencing

Amendments to the Forestry Act 1967 mean we are changing how we regulate forestry and in particular commercial felling. Applications received after 01 April 2024 have been subject to new powers meaning we can apply conditions to licences to protect wildlife and the environment during felling as well as amend, suspend, or revoke licences where necessary. We intend to review how this permitting work and associated compliance should be resourced as it is currently funded solely through Grant in Aid.

6. Industrial Decarbonisation

NRW anticipates a significant increase in work related to industrial decarbonisation projects across Wales in the coming years. This includes major initiatives in carbon capture and storage, hydrogen production and use, and sustainable fuel facilities. These projects, critical for achieving net zero emissions, will require substantial regulatory oversight and specialist expertise.

We foresee a growing need for enhanced pre-application advice, technical input, and timely permitting decisions for these complex, first-of-a-kind facilities. This may necessitate changes to our charging structure to ensure we can provide the level of service required to enable these transformative projects while maintaining environmental protection.

While we are not proposing specific charge changes at this time, we want to signal that we are actively considering how to resource this vital work effectively. This may involve developing new charging mechanisms or adjusting existing ones to reflect the scale and complexity of industrial decarbonisation projects.

7. Charging as a statutory consultee – Nationally Significant Infrastructure Projects) – Development Consent Orders – interim proposal

Nationally Significant Infrastructure Projects (NSIPs) require a Development Consent Order before they can proceed, and applications are determined by the Secretary of State.

NRW must be consulted on a proposed Nationally Significant Infrastructure Project (NSIP) before applying for a Development Consent Order (DCO), within the geographical extent of Wales or otherwise likely to affect land in Wales.

Following a public consultation undertaken by the Department of Levelling Up, Housing & Communities (DLUHC) (July 2023), NRW has provision under The Infrastructure Planning (Fees) (Amendment) Regulations 2024 to recover costs for the advice we provide in relation to a Development Consent Order. This includes the costs of providing advice during both discretionary and statutory stages of the DCO application process.

It is NRW's intention to extend the existing [Discretionary Advice Service \(DAS\)](#) framework to recover costs for statutory and non-statutory advice we provide in relation to a DCO at a £125 hourly rate as an interim measure.

Before commencing the cost recovery mechanism for our advice on DCO applications, we will publish more information on our website on the scope of our cost recovery framework and how it may be accessed.

We will also make best endeavours to raise awareness within the sector of the commencement date for recovering costs and any transitional arrangements.

If you wish to be notified of any update in relation to NRW's position on implementing the cost recovery provision set out in [The Infrastructure Planning \(Fees\) Amendment Regulations 2024](#), please notify us by contacting: EPP.Planning@cyfoethnaturiolcymru.gov.uk

NSIPs may also require other consents determined by NRW which may be subject to a charge.

Responding to this consultation

How to respond

We are seeking your views and opinions on our proposals for our regulatory charges from 1st April 2025. We will use the feedback to inform our final schemes, which we intend to implement from 1st April 2025 subject to Welsh Government approval.

This consultation closes at 23:59 on Sunday 12th January 2025.

Our consultation is available on our website at:

<https://ymgynggori.cyfoethnaturiol.cymru/sroc/nrw-charge-consultation-2025-26>

Data protection

Your response will be seen in full by Natural Resources Wales staff dealing with this consultation. It may also be seen by other Natural Resources Wales staff to help plan future consultations.

We will analyse and publish a summary of the responses to this consultation we receive. We may publish free-text responses and those received via email or post in full.

We will include the name and part of the address of the person making the response when we publish our response to the consultation. This helps to show that the consultation was conducted properly. If you do not want your name and address to be published let us know when making your response and we will remove them from published material.

Names and addresses we remove might still be published later, although we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including Natural Resources Wales. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks us to seek information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published that is an important factor that we would take into account. However, there might sometimes be an important reason we would have to reveal someone's name and address, even though they have asked for them not to be published. We would contact the person and ask their views before we finally decide whether to reveal the information.

Next steps

Following the consultation, we will make all comments (including the personal information detailed above) and our responses publicly available on our website. If you respond with an email address, we will acknowledge your response and will notify you when we publish the summary of responses on our website.