# Preliminary Assessment Public Summary

This *Preliminary Assessment Public Summary*, prepared by Puro.earth, contains general information about the $CO_2$ Removal Supplier and its project, as evaluated at the time of the Preliminary Assessment (PA). It also includes a *Non-Technical Project Summary* and a *Criteria Assessment Report* detailing: i) key criteria assessed and their associated outcomes, ii) Puro's comments, and iii) evidence provided by the $CO_2$ Removal Supplier.

The *PA Public Summary* serves as a transparent communication tool, enabling potential investors, buyers, and stakeholders to quickly understand the supplier's carbon removal capabilities and assessment status.

The supplier has also received an extended *Preliminary Assessment Report*. This confidential document offers in-depth insights, including specific remarks and actionable recommendations to guide the supplier's progression through the certification journey.

## 1. Supplier and Project Information

| $CO_2$ Removal Supplier | |
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| **Company name** | Nellie Technologies, LTD |
| **Company address** | AIEC, SY23 3EE Aberystwyth – United Kingdom |
| **Business ID** | 13888126 |
| **KYC status** | Completed |
| **$CO_2$ Removal Project** | |
| **Methodology** | **Biochar, Edition 2022/2025** |
| **Production Facility name** | Nellie Mwyndy Cross |
| **Facility registration date** | April 09, 2025 |
| **Production Facility ID** | 412331 |
| **Production Facility location** | Mwyndy Environmental Innovation Centre<br>CF72 8PN Pontyclun – United Kingdom |
| **Host Country of removal** | United Kingdom |
| **Has this facility been registered in another registry?** | ☒No<br>☐Yes, additional information: |
| **Preliminary Assessment Details** | |
| **Date of assessment** | 19 January 2026 |
| **Status of assessment** | Completed |
| **Conclusion of assessment** | Passed |

## 2. Non-Technical Project Summary*

Nellie operates a carbon dioxide removal (CDR) facility at Mwyndy Cross in South Wales, United Kingdom, located within a post-industrial landscape historically affected by heavy industry and land degradation. This setting offers significant opportunities for environmental regeneration, including bioremediation and the productive reuse of industrial land, while delivering socio-economic benefits through skilled local employment and new clean-technology infrastructure. The facility produces biochar from purpose-grown microalgal biomass cultivated on-site in enclosed photobioreactor systems. This approach ensures a secure, traceable, and continuously available feedstock, decoupled from land-use change, agricultural commodity markets, or imported biomass supply chains. The biomass is converted into biochar through thermochemical processing, creating a stable carbon material suitable for long-term storage when applied to soil. The biochar produced has a nutrient-rich mineral profile, making it particularly well-suited to UK agricultural soils; contributing to more resilient farming systems alongside permanent carbon removal. Through integrating biomass production and conversion, the project delivers durable climate mitigation while supporting land restoration, agricultural productivity, and regional economic transition in line with global net-zero objectives.

*Filled by the Supplier. Between 150-200 words

The definition of $CO_2$ Removal Supplier and Production Facility can be found in the Puro Standard.

## 3. Criteria Assessment Report

Reminder: Sub-criteria either concern the Production Facility's technical eligibility or its maturity and quality. There are three types of sub-criteria:

- **Required to be passed:** These correspond to the core criteria related to the eligibility of a Production Facility. Suppliers must meet these criteria, as they may otherwise be impossible or costly to change at a later stage of the certification journey.
- **Required to be assessed**: These criteria are important for evaluation but do not necessarily determine pass or fail at this stage, as it is understood that the suppliers may be at different stages of development.
- **Not required:** These criteria are optional at this stage. They may provide additional information about the project maturity but are not essential for passing the preliminary assessment.

For a facility to be considered eligible for listing, all the sub-criteria that condition eligibility must be met (i.e. passed or assessed). If one of those sub-criteria is not met, the facility in its current state of development is not eligible for listing.

Disclaimer: The assessment has been made against the criteria in the current version of the methodology. Puro.earth relied on the $CO_2$ Removal Supplier for the correctness of the provided information during the time of the preliminary assessment and will make no representation as to the accuracy or completeness of this report. The $CO_2$ Removal Supplier must undergo a third-party audit before issuing $CO_2$ Removal Credits (CORCs). **Passing the preliminary assessment does not guarantee a success in the third-party audit.**

**Important Notice Regarding Biochar Methodology Update:** This Preliminary Assessment has been conducted against Edition 2022, but to some extent, reflected some important changes in the updated Biochar Methodology – Edition 2025.

**Overall evaluation:** Preliminary Assessment is: **Passed.**

*Table 1. Criteria and sub-criteria assessment by Puro based on the documents submitted.*

| ID | Criteria / Sub-criteria | Outcome | Comment | Evidence reviewed | Requirement for listing | Purpose of criteria |
|---|---|---|---|---|---|---|
| **C1** | **Planned biomass feedstock(s) is(are) eligible** | **Passed** | | | *Passed if required sub-criteria are met* | |
| *C1.1* | *Biomass feedstocks are identified and compatible with EBC positive list* | Passed | The Supplier identified a single biomass feedstock: purpose-grown microalgae, classified under Category W–02 (Aquatic plants and algae) of the EBC/WBC Positive List of Feedstocks. *Under Biochar Methodology – Edition 2025, this feedstock falls under Category O. Aquatic biomass of Puro's biomass Sourcing Criteria.* | F 04 Biomass Types and Origins List BCH.pdf; OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf | Required to be passed | Technical eligibility |
| *C1.2* | *Biomass feedstock sustainability and chain-of-custody can be demonstrated, if applicable* | Passed | • Microalgae are cultivated on-site by the Supplier at Nellie Mwyndy Cross, Wales, in the UK; as a result, full traceability is inherent, and preliminary records have already been provided. Comprehensive record-keeping will be required for the audit.<br>• The feedstock is purpose-grown in Nellie's proprietary PhycoTank™ photobioreactor (PBR) system, which enables accelerated | F 04 Biomass Types and Origins List BCH.pdf; OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; F 03 03 Puro Environmental and Social Safeguards.pdf; F 03 01 | Required to be passed | Technical eligibility |

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| | | | microalgal biomass production. On this basis, the feedstock is considered sustainably managed. Although third-party certification is not required for this feedstock type, it must still be sourced using sustainable, legal, and safe working practices, which the Supplier has demonstrated awareness of. | Environmental Permits and EIA.pdf; O 01 Records of Biomass Used.pdf | | |
| *C1.3* | *Bioenergy leakage related to feedstock use is minimal* | Assessed | The feedstock is purpose-grown on-site with no alternative energy use identified; bioenergy leakage is therefore minimal. | F 04 Biomass Types and Origins List BCH.pdf; OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf | Required to be assessed | Technical eligibility |
| *C1.4* | *Land use change related to feedstock use is minimal* | Assessed | The feedstock is purpose-grown on-site in Nellie's proprietary PhycoTank™ photobioreactor (PBR) system, an enclosed vessel, rather than in open waters; land-use change is therefore minimal. | F 04 Biomass Types and Origins List BCH.pdf; OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf | Required to be assessed | Technical eligibility |
| *C1.5* | *Sourcing of biomass is secured (e.g. letters of intent, contracts)* | Assessed | The biomass feedstock is cultivated on-site by the Supplier itself, ensuring secure sourcing. | F 04 Biomass Types and Origins List BCH.pdf; OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf | Not required | Maturity & Quality |
| **C2** | **Planned biochar production equipment is technically sound** | **Passed** | | | *Passed if required sub-criteria are met* | |
| *C2.1* | *Several options of reactor design have been identified* | Passed | • The current pilot operation uses a proprietary, custom-built batch pyrolysis system (MC_PR_110924) based on repurposed steel-drum retort vessels. It is manually operated in a semi-continuous mode, with individual batch cycles run sequentially.<br>• At scale-up, the Supplier plans to deploy modular, continuous-feed pyrolysis units with automated control of feed rate, temperature, and air injection. The upgraded system will include digital MRV integration, as well as advanced flue gas treatment with cyclone separation, scrubbing, and VOC/NOx filtration to ensure compliance with EU air quality standards. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; F 05 01 01 Biochar production equipment questionnaire.xlsx ; Nellie Technical Schematics & Images folder | Required to be passed | Technical eligibility |
| *C2.2* | *Reactor design has been decided, contracted, or purchased* | Assessed | The curret reactor was custom-designed and built in-house by the Supplier, Nellie Technologies Ltd, in November 2023, with additional design modifications implemented and deployed in September 2024. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; F 05 01 01 Biochar production equipment questionnaire.xlsx | Required to be assessed | Maturity & Quality |
| *C2.3* | *Reactor design is vetted, regarding production of biochar with H/C ratio below 0.7* | Passed | The feedstock is first dewatered to approximately 20% moisture content, then fed into the pyrolysis reactor and heated to 450–500 °C, typically stabilizing around 470 °C under steady-state conditions. The pyrolysis residence time is 120–180 minutes, with a heating rate of 5–10 °C/min during ramp-up. Laboratory analyses of biochar produced in the pilot reactor indicate that the equipment can achieve an H/C ratio below 0.7. Upon scale-up, test results from the upgraded system will need to be provided. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; F 05 01 01 Biochar production equipment questionnaire.xlsx; O 02 01 TP_BIOCHAR_A_081224_Redacted.pdf | Required to be passed | Technical eligibility |
| *C2.4* | *Reactor design is vetted, regarding risk for $CH_4$ emissions* | Passed | • As a batch/semi-continuous biochar production system, the current reactor inherently presents a higher risk of incomplete combustion | OP_NELLIE_100T_DAC_PDD_V3.5_ANALYST.pdf; F 05 01 01 | Required to be passed | Technical eligibility |

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| | | | and associated $CH_4$ emissions. To mitigate this risk, combustion of syngas and oils occurs at 850–1,000 °C with a residence time of 1.5–2 seconds, followed by secondary combustion in an afterburner operating at approximately 1,000 °C to oxidize remaining pyrolysis gases. However, at the current pilot scale, the system does not have engineered fuel injection or mechanical gas–air mixing; combustion is manually controlled, with thermocouples used for temperature monitoring. These design characteristics limit process control and may increase the risk of incomplete combustion at the pilot scale. The Supplier further conducted internal air emission testing using a portable flue gas analyser with electrochemical and NDIR sensors, including $CH_4$ measurements (expressed in ppm) during stable operations (excluding start-up and shut-down phases of the batch process). In the absence of flue gas flow measurements, the measured $CH_4$ concentrations were combined with stoichiometric calculations and assumptions to estimate a $CH_4$ emission factor per dry metric tonne of biochar. The preliminary calculations infer a negligible $CH_4$ emission factor, for stable operations. In the future, $CH_4$ measurements needs to be complemented with flue gas flow measurement and include start-up and shut-down phases of the batch process, which the Supplier is committed to perform prior to audit.<br>● For scale-up operations, the Supplier plans to install continuous emissions monitoring systems (CEMS) and automated temperature control, which are expected to further reduce the risk of incomplete combustion and $CH_4$ emissions. Verification at scale-up will rely on CEMS data. | Biochar production equipment questionnaire.xlsx; Nellie Technical Schematics & Images folder ; OP_NELLIE_MWYNDY_CROSS_PYRO_EIMISSIONS_RECORDS_2025_AUG_V1_INTERNAL.xlsx; MRV_PDD_APPENDIX_5.1.4.3.1.3.A_METHANE_EMISSISIONS_ESTIMATION_CALCULATIONS_V1_ANALYST.pdf | | |
| *c2.5* | *Reactor design is vetted, regarding air pollutant emissions in line with local regulation* | Passed | ● The current reactor design includes an afterburner and a filter, which reduce visible smoke, odour, and particulate matter (PM) by approximately 50–60%. Hydrocarbons in the syngas are largely combusted, thereby reducing volatile organic compounds, although trace emissions of CO, NOx, SOx, and PM may still occur.<br>● Although continuous monitoring is not required at the pilot scale, as operations fall below the Environmental Permit threshold under Low-Risk Waste Position 61 (LRWP 61) managed by Natural Resources Wales (NRW), the Supplier has conducted internal measurements using a portable stack gas analyser, providing real-time data on $O_2$, CO, $CO_2$, NO, $NO_2$, and $SO_2$ (expressed in ppm). The current reactor design is thus considered to partially mitigate air pollutant emissions at the pilot scale.<br>● Full compliance with local air quality regulations will be demonstrated at scale-up through the implementation of CEMS with defined pollutant thresholds, together with additional flue gas | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; F 05 01 01 Biochar production equipment questionnaire.xlsx; Nellie Technical Schematics & Images folder | Required to be passed | Technical eligibility |

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| | | | treatment measures, including cyclone separation, scrubbing, and VOC/NOx filtration. | | | |
| *c2.6* | *Facility design is vetted, regarding disposal of waste streams, including any liquid streams (wastewater, oil, tars)* | Passed | • The current reactor is not designed to produce oils, generating only incidental amounts of heavy tars in ducting and occasional quantities of filter dust. These wastes are collected in sealed containers and removed by a licensed contractor under site waste management controls.<br>• During scale-up, design changes are considered to install a condensation unit to produce bio-oil for other purposes. This future design must be evaluated at a later stage, when information becomes available. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; F 05 01 01 Biochar production equipment questionnaire.xlsx; Nellie Technical Schematics & Images folder; F 03 04 Environmental Evaluation Report.pdf | Required to be passed | Technical eligibility |
| *c2.7* | *Facility is co-producing bioenergy (e.g. heat, power) for internal use* | Assessed | Low-grade heat from pyrolysis is recovered to pre-dry wet algal biomass and sustain optimal reactor temperatures. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; F 05 01 01 Biochar production equipment questionnaire.xlsx | Required to be assessed | Maturity & Quality |
| *c2.8* | *Facility is co-producing bioenergy (e.g. heat, power, fuel) for external use* | Assessed | Currently, pilot operations do not co-produce bioenergy for external use. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; F 05 01 01 Biochar production equipment questionnaire.xlsx | Required to be assessed | Maturity & Quality |
| **c3** | **Biochar planned end-use(s) is(are) eligible** | **Passed** | | | *Passed if required sub-criteria are met* | |
| *c3.1* | *Biochar end-uses are eligible* | Passed | The biochar will be used as a soil amendment on local agricultural land. This intended end-use is eligible. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; | Required to be passed | Technical eligibility |
| *c3.2* | *Plans of biochar end-uses are tangible* | Assessed | The Supplier intends to sell pure biochar directly to farmers in South Wales and West Wales, in the UK. This plan is realistic, supported by biochar sale invoices. Comprehensive records of biochar delivery and end-use will need to be provided for the audit. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; | Required to be assessed | Maturity & Quality |
| *c3.3* | *Biochar environmental quality thresholds are known for the identified end-uses* | Assessed | The Supplier is aware of environmental quality regulation for biochar, and in the absence of UK-specific regulations, intends to benchmark its biochar production against the threshold values of the European Biochar Certificate for soil use (EBC Agro). The Supplier also intends to follow UK Biochar Research Centre (UKBRC) toolkit for characterisation of the agronomic value of its biochar. Laboratory analyses of biochar produced in the pilot reactor measured heavy metals, indicating low levels. The Supplier further indicated that PAHs were preliminary screened, but that complete analysis remain to be conducted. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; F 07 03 Biochar Sampling and Testing Frequency Protocol.pdf; O 02 01 TP_BIOCHAR_A_081224_Redacted.pdf | Required to be assessed | Maturity & Quality |
| **c4** | **Additionality is demonstrated** | **Passed** | | | *Passed if required sub-criteria are met* | |
| *c4.1* | *Carbon storage additionality to baseline* | Passed | Without the project, there would be no microalgae cultivation or biochar production. Therefore, the carbon storage achieved is considered additional to the baseline. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; F 02 Baseline and Additionality Questionnaire v1.9.docx.pdf | Required to be passed | Technical eligibility |

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| *c4.2* | *Financial additionality of facility* | Passed | The Supplier has reported significant operating costs for microalgae cultivation and biochar production, which are expected to be covered primarily by carbon finance and, to a lesser extent, biochar sales. Future revenues may also arise from pyrolysis co-products. Based on these factors, the project is likely to demonstrate financial additionality; however, a simple cost analysis is insufficient and should be replaced by a formal investment analysis. Detailed financial calculations have not yet been provided by the Supplier. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; F 02 Baseline and Additionality Questionnaire v1.9.docx.pdf | Required to be passed | Technical eligibility |
| *c4.3* | *Regulatory additionality* | Passed | The project is not required by any existing law, regulations, or other binding obligations in the UK. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; F 02 Baseline and Additionality Questionnaire v1.9.docx.pdf | Required to be passed | Technical eligibility |
| *c4.4* | *Production equipment is newly built (i.e. not an existing facility or a retrofit of existing facility)* | Assessed | The equipment is newly built, and has been operational since January 2024. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; F 05 01 01 Biochar production equipment questionnaire.xlsx | Required to be assessed | Maturity & Quality |
| **c5** | **Facility has monitoring, reporting, and LCA capabilities or tangible plans** | **Passed** | | | *Passed if required sub-criteria are met* | |
| *c5.1* | *Protocol for biomass and biochar record keeping is prepared* | Passed | The Supplier has prepared a detailed MRV plan to align record-keeping with recognised industry standards, including ISO 14064-2 and EU ETS guidelines. The plan lists the parameters to be monitored for microalgae biomass production and conversion into biochar, and preliminary record-keeping data demonstrates strong capability in data management. However, the plan needs to be further developed into operating procedures that clearly specify how biomass and biochar data will be monitored, and recorded, including biomass input mass, biochar output mass, linkage to biochar batch identification and sales records, and data verification processes. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; O 04 03 OP_NELLIE_MWYNDY_CROSS_PRODUCTION_RECORDS_2024__Q4_V2_ANALYST | Required to be assessed | Maturity & Quality |
| *c5.2* | *Protocol for dry mass determination of biochar is prepared* | Assessed | The Supplier has prepared a detailed MRV plan that includes a protocol for quantifying biochar dry mass. The protocol covers responsibilities, required equipment and materials, sampling procedures (where, how, and how frequently moisture content is determined), calculations, equipment calibration and verification, QA/QC, and record-keeping. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; MRV_PDD_APPENDIX_5.1.4.A_DRYWEIGHT_BIOCHAR_METHOD_V1_ANALYST.pdf | Required to be assessed | Maturity & Quality |
| *c5.3* | *Protocol for biochar sampling and laboratory analysis is prepared (permanence and environmental quality)* | Assessed | The Supplier has prepared a detailed MRV plan that includes a protocol for biochar sampling and laboratory analysis. The protocol covers responsibilities, equipment and materials, sampling procedures (where, how, and how frequently samples are taken), composite sample preparation (how and how often samples are combined), QA/QC, and record-keeping. However, the frequency of testing for biochar persistence and environmental quality is not specified. The | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; MRV_PDD_APPENDIX_5.1.4.A_SOP_BC01_V1_ANALYST.pdf | Required to be assessed | Maturity & Quality |

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| | | | protocol must be revised to define these testing frequencies and turned into precise operating procedures. | | | |
| *c5.4* | *Monitoring and reporting plan of facility emissions is prepared* | Assessed | The detailed MRV plan includes monitoring pyrolysis temperature and residence time, along with a high-level emissions to air monitoring plan. It should be expanded to provide a comprehensive assessment of supply chain emissions and then turned into precise operating procedures. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf | Required to be assessed | Maturity & Quality |
| *c5.5* | *An LCA model specific to the facility's operation is prepared* | Assessed | An LCA model, supported by a spreadsheet using Puro's template, demonstrates that LCA modelling has begun and reflects strong capability in carbon accounting. High-level activity boundaries, along with preliminary estimates of key monitoring parameters and emission factors, provide initial project emissions estimates. Although the inventory modelling is not yet complete, the LCA model is expected to meet Methodology requirements once further refinements are made. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; F 08 01 Puro LCA Model Biochar Nellie 2024 Final.xlsm | Not required | Maturity & Quality |
| **c6** | **Facility has likely co-benefits and positive SDG impacts** | **Passed** | | | *Passed if required sub-criteria are met* | |
| *c6.1* | *Facility-specific co-benefits have been identified* | Assessed | Microalgal biochar improves soil fertility and agricultural productivity by providing higher nutrient and mineral content, enhancing moisture and nutrient retention, and stimulating soil microbial activity compared to conventional biochar. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf | Required to be assessed | Maturity & Quality |
| *c6.2* | *Facility-specific SDG targets or indicators have been identified* | Assessed | The Supplier does not intend to pursue any additional SDGs targets or indicators. | NELLIE_COMPLETED_OP_PUROPRELIMAUDIT_210225_V1_ANALYST_Audit Document Index - Biochar | Required to be assessed | Maturity & Quality |
| **c7** | **Facility team has access to relevant knowledge and skills** | **Not Required** | | | *Passed if required sub-criteria are met* | |
| *c7.1* | *Relating to biomass sourcing, handling, processing* | Not Required | No specific information was provided and therefore a formal assessment was not conducted. | No specific information provided | Not required | Maturity & Quality |
| *c7.2* | *Relating to thermochemical processes* | | | | | Maturity & Quality |
| *c7.3* | *Relating to biochar use* | | | | | Maturity & Quality |
| *c7.4* | *Relating to monitoring and carbon accounting* | | | | | Maturity & Quality |
| **c8** | **Environmental and social safeguards** | **Passed** | | | *Passed if required sub-criteria are met* | |
| *c8.1* | *Stakeholder consultations have been planned or conducted* | Assessed | Consultation with local and regional stakeholders included adjacent farms, local authorities, Welsh government, and industry experts. Engagement activities were conducted through in-person site visits and formal presentations; feedback was constructive, documented, and responded to, with no objections raised. A continued engagement | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; F 03 02 Puro Stakeholder Engagement Report | Required to be assessed | Maturity & Quality |

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| | | | plan has been outlined, though additional information is needed on community liaison channels and accessible communication platforms. | | | |
| *c8.2* | *Regulation applicable to facility has been identified* | Assessed | The project ensures compliance with EU, national, and local regulations covering environmental permitting, biochar use in agriculture, chemical and hazardous substance management, site planning, and worker health and safety. Key regulations include the Environmental Permitting Regulations 2016, which transpose the EU Industrial Emissions Directive (2010/75/EU), with design and emissions controls guided by the UK Clean Air Act 1993 and Best Available Techniques (BAT) for Waste Incineration and Pyrolysis Activities (DEFRA, 2020). The project also complies with the UK Fertiliser Regulations 2022, COSHH 2002, Town and Country Planning Act 1990 with Planning Policy Wales, UK REACH, and the Health and Safety at Work Act 1974.Overall, relevant regulations have been identified both for the current pilot scale and for planned future scale-up operations. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; F 03 03 Puro Environmental and Social Safeguards.pdf | Required to be assessed | Maturity & Quality |
| *c8.3* | *Procedures to acquire relevant permits have been identified, started, or completed* | Assessed | At the current pilot scale, operations fall below the threshold for an Environmental Permit under Low-Risk Waste Position 61 (LRWP 61), managed by Natural Resources Wales (NRW); therefore, no on-site environmental testing or continuous measurements are required. For future scale-up plans, the relevant permits have been identified, and the requirements for obtaining them are understood. | OP_NELLIE_100T_DAC_PDD_V3.2_ANALYST.pdf; F 03 03 Puro Environmental and Social Safeguards.pdf ; F 03 01 Environmental Permits and EIA.pdf | Required to be assessed | Maturity & Quality |