

Compliance Assessment Report CAR_NRW0043055

Permit being assessed: DB3092FJ.

For: Fiberight Limited, held by Fiberight Limited

At: Unit 1A, Westfield Industrial Park, Waunarlwydd, Swansea, Swansea, SA5 4SF.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 14/12/2023 between 10:00 and 12:30.

Parts of permit assessed: A, B, C, D, F, G

NRW Lead Officer: David Morgan, accompanied by Thomas Anthony.

Report sent to: Nick Thompson, Managing Director on 20/12/2023.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C1 - General Management - Staff competency/training	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
D2 - Incident Management - Accidents, emergency and incident planning	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
F4 - Amenity - Pests/birds and scavengers	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

A site inspection was undertaken by Natural Resources Wales on Thursday 14th December 2023. This was the first regulatory inspection of the facility and a compliance assessment of operations was made against several conditions of the Environmental Permit (ref: EPR/DB3092FJ)

Present during the inspection were: David Morgan, Thomas Anthony (Natural Resources Wales) and Nick Thompson, Paul Martin and Royston Whitney (Fiberight Ltd).

During the inspection on Thursday 14th December 2023, the following observations were made:

Waste Processing, Storage and Segregation

It has been noted that the processing of waste on site is unique in that waste (namely plastics/MRF rejects) is accepted, water is added, and then elements of the waste are separated in a revolving drum before materials are pressed thus creating a pulp.



All stages of the process are contained within a building and although some minor amounts

of material had escaped the plant during the loading/unloading phases, this material was contained and collected with ease.

All waste was clearly separated and segregated. The process appears to be successfully producing segregated waste types that otherwise would be disposed of by incineration at other facilities. Notably, the process produces a clear stream of cans/metals, plastics (which are recirculated) which results an improved recycling rate of these individual wastes.



Waste bales that had recently been accepted on site were clearly stored by type/supplier. These bales appeared to conform to the descriptions of waste listed in the Environmental Permit. Furthermore, waste appeared to conform to the description and coding of waste listed in the Environmental Permit (ewc 19 12 04). This was cross-referenced against Duty of Care Waste Transfer Notes for incoming waste and deemed compliant.

19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	paper and cardboard
19 12 04	plastic and rubber
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 (limited to dry recyclates only)

The process for waste acceptance, on-site checks of loads, rejecting loads and quarantining loads was discussed in length. The site benefits from having large areas within the building where waste can be quarantined and segregated when necessary, prior to its removal from site.

Water Management

Although significant volumes of water are used in the beginning of the process, water appears to be recycled and fully contained within a sump in the building. Water is added to the beginning of the process, collected in the final 'pulp' stages of the process and recirculated back into the process thus negating the need to discharge water to the foul or surface water drainage systems.

Natural Resources Wales, in a future inspection, may request to inspect the water storage sump or check maintenance records to ensure its structural integrity.

Generally, there appeared to be very minor loss of water through the process and all water was contained in the building.

Site Infrastructure & Amenity

Prior to the inspection, officers undertook a brief inspection of areas in close proximity to the site. At the time of the inspection, there was no perceived detrimental impact on the amenity stemming from operations. There was no noticeable excessive noise, odour, litter or signs of pests in the local amenity.

Although not required for the permit application, both a Noise Management Plan and Pest Management Plan were made available for inspection. Copies of these documents have now been forwarded to the area team and we may wish to assess these in due coming months.

Site infrastructure appears to be maintained to a high standard. The building (cladding) prevents the escape of noise and litter, while the impermeable concrete surfaces within the building support the containment of all waters discharged from the pulping process.

Management Systems & Technical Competence

Following an inspection of the site, we discussed several topics, including how Natural Resources Wales regulates its sites, frequency of inspections, compliance scoring and the impact of compliance on subsistence fees.

Officers requested copies of documents and management plans related to the operation of the site. Copies of the Environmental Permit and Environment Management System (EMS) were made available on request. A discussion was also had regarding the ease of access of these documents for staff on site who hold responsibilities in relation to the Environmental Permit.

We have a copy of the site's Environment Management System and other associated management plans (Noise/Pests). As with all newly permitted facilities, we will endeavour to review these plans in coming months and provide any feedback if necessary.

As part of the review of documentation, extensive training records, health & safety records and proof of technical competence were provided for inspection.

Fire Prevention and Mitigation Plan

Compliance with the Fire Prevention and Mitigation Plan (FPMP) was not assessed in detail during the inspection of 14th December 2023. It is likely that this area of operations and compliance will be assessed during an inspection in early next year which is solely focussed on this aspect.

It was noted that you intend to overhaul fire prevention and mitigation systems on site.

Please ensure the FPMP is updated to reflect any changes to fire prevention equipment/procedures. Despite changes being planned, until those changes have been implemented and accepted (via an amended FPMP) by Natural Resources Wales, you must be compliant with your current FPMP for the site.

Summary

The first regulatory inspection of Fiberight Ltd was undertaken by Natural Resources Wales on Thursday 14th December 2023.

Several areas of compliance were assessed including, but not limited to; impact on the local amenity from operations, waste acceptance, storage and segregation and also containment of materials during the pulping process (water management). A number of documents (management systems and Waste Transfer Notes) were also provided for inspection when requested and these appeared to be compliant. The Environment Management System will be reviewed at a later date.

No non-compliances were recorded during this inspection and operations appeared to be fully compliant with the conditions of the Environmental Permit on this occasion.

It is likely that the next regulatory inspection will focus on the following areas:

- * compliance with the current Fire Prevention and Mitigation Plan (FPMP)
- * further review of waste acceptance, coding and descriptions
- * review of waste returns (Quarter 4 - October, November, December 2023, due to be submitted before end of January 2024)

Thank you for your time during the inspection.

END OF REPORT

Any compliance criteria not highlighted in the above summary should be considered as not assessed. In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resource Body for Wales (Establishment) Order 2012. You should note that the Natural Resources Body for Wales has been formed by bringing together the Countryside Council for Wales, Forestry Commission Wales and Environment Agency Wales. The Natural Resources Body for Wales has been empowered to exercise Welsh devolved functions since 1st April 2013 and has, generally, taken over the responsibilities of the Countryside Council for Wales, the Forestry Commissioners and the Environment Agency for Wales.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.