

Compliance Assessment Report CAR_NRW0043183

Permit being assessed: VB3597TS.

For: Gmh Vehicle Dismantlers, held by Gmh Vehicle Recyclers Limited

At: Rumney, Cardiff, Glamorgan, CF3 2EH.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 23/02/2024.

Parts of permit assessed: 21, (6)

NRW Lead Officer: Dafydd Evans.

Report sent to: Tahir Aziz, Managing Director on 23/02/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4 No impact	21
A1 - Specified by permit	Action only (X)	

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

Total number of non-compliances recorded	Total non-compliance score
1	0.1

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?

Criteria	Action needed	Complete by
G4	<p>Please submit the outstanding waste return for Q2 of 2023 and put in place procedures to ensure that all future returns are completed and submitted in time. As the return cannot be processed as it contains errors, the waste return for this period Q2 of 2023 remains outstanding. Please be aware that if no waste has been accepted during a quarter you are still required to submit a NIL return.</p> <p>The waste return submitted for quarter 2 is dated 25/04/2023 and is named 'Jan-Mar'. Quarter 2 runs from April to June, and submission would be required within 1 month at the end of the quarter, by 31st July. It also omits the activity code and expiry date of continuing competence, both items are mandatory information. The waste return provided is therefore an invalid submission for Quarter 2 of 2023.</p>	08/03/2024

Criteria	Action needed	Complete by
	Please provide the missing return by 08/03/2024.	
A1	<p>Part of the permit assessed: (6) Technical competence: notification condition.</p> <p>As per The Environmental Protection (Miscellaneous Amendments) (England and Wales) Regulations 2018 (legislation.gov.uk), you are required to report your compliance with a technical competence scheme on your waste returns.</p>	08/03/2024

Action criteria codes are listed in the 'Important information' section below.

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

Missing waste returns

Following a recent review of submitted waste returns for 2023, *our records show that you have not submitted returns for Q2 of 2023*. As the return cannot be processed as it contains errors, the waste return for Q2 of 2023 remains outstanding. As a result of this non-compliance, you have been scored accordingly.

G4 – Reporting and notification to Natural Resources Wales. Category 4 breach.

21. A record shall be kept of the types and quantities of waste delivered to, and removed from, the facility, giving details of the final destination, including materials inadvertently delivered to and subsequently removed from the facility. The record shall comprise full details, as required, on forms agreed with the Waste Regulation Authority. These records shall be made available for inspection by an authorised officer of the Waste Regulation Authority at the facility at any reasonable time. The licence holder shall forward to the Waste Regulation Authority annual returns of metals processed and annual returns of waste forwarded for final disposal.

Action:

You are required to submit your outstanding waste return for 2023 and put in place procedures to ensure that all future returns are completed and submitted in time. Please be aware that if no waste has been accepted during a quarter you are still required to submit a NIL return. Please provide the missing return by 08/03/2024.

The waste return submitted for quarter 2 is dated 25/04/2023 and is named 'Jan-Mar'. Quarter 2 runs from April to June, and submission would be required within 1 month at the end of the quarter, by 31st July. It also omits the activity code and expiry date of continuing competence, both items are mandatory information. The waste return provided is therefore an invalid submission for Quarter 2 of 2023.

The required timescales for submissions are below:

Quarterly Returns Period	Return Submission Deadline
Q1 - 1st January to 31st March	30th April
Q2 - 1st April to 30th June	31st July
Q3 - 1st July to 30th September	31st October
Q4 - 1st October to 31st December	31st January

Failure to meet future return deadlines may result in escalation of our scoring category for such a breach and may also result in further action.

Waste return spreadsheets can be found on the following link:

[Natural Resources Wales / Submit your waste return](#)

Please submit missing waste returns to the following:

[Email:waste.returns@naturalresourceswales.gov.uk](mailto:waste.returns@naturalresourceswales.gov.uk)

A1 - Specified by Permit

Technical competence: notification condition

As the holder of an environmental permit which authorises a specified waste management activity, 2. (1) of The Environmental Protection (Miscellaneous Amendments) (England and Wales) Regulations 2018 No. 1227, PART 3 Amendments relating to environmental permitting applies, which specifies the **Technical competence: notification condition** and as such, you are subject to the condition in sub-paragraph (6) which states-

'the operator must periodically give the regulator (a) information demonstrating the operator's compliance with one of the following standards during the relevant period; or (b) if the operator did not comply with one of the following standards during the relevant period, information to that effect.'

(7) The first standard is the CIWM/WAMITAB Operator Competence Scheme: Version 9, September 2018, published by WAMITAB.

(8) The second standard is the Competence Management System: Requirements, Version 4, April 2015, published by Energy and Utility Skills.

Action Required: As per The Environmental Protection (Miscellaneous Amendments) (England and Wales) Regulations 2018 (legislation.gov.uk), you are required to report your compliance with a technical competence scheme on your waste returns.

Should you require guidance on how to report this, please respond to the sender of this Compliance

Assessment Report.

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.