

Compliance Assessment Report CAR_NRW0044279

Permit being assessed: QB3093HE.

For: Alexandra Docks, **held by:** South West Wood Products Limited

At: East Way Road, Newport, NP20 2NP.

Type of assessment: Site Inspection,

Reason: Incident Response (Incident number 2405388).

On: 23/04/2024 between 10:00 and 11:00.

Parts of permit assessed: Various.

NRW Lead Officer: Greg Gardner, accompanied by Jodie Baskerville.

Report sent to: Ms. Rita Vassallo, Technically Competent Manager, on 23/05/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2D - Waste - Operations - The site	Assessed (A)	
W3A - Waste - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W3G - Waste - Emissions and monitoring - Fire	Assessed (A)	

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

Total 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

This report details the site visit made on the 23rd April 2024 to South West Wood Products, Newport, permit reference number EPR-QB3093HE.

Natural Resources Wales (NRW) Officers Greg GARDNER and Jodie BASKERVILLE attended the South West Wood Products site at Alexandra Docks, East Way Road, Newport, NP20 2NP for a unannounced routine site inspection at 10:00am, following a NRW Incident Report (WIRS 2405388) where we met with Mr. Tim JACKSON (Site Manager). The weather was wet and reasonably mild which it had been the previous day.

PERMIT BREACHES / ACTIONS

No permit breaches / actions have been identified during this site inspection.

NRW INCIDENT REPORT - WIRS 2405388

NRW received an environmental incident report on 19/04/24 at 10:04am with regards to South West Wood Products Ltd, Alexandra Docks. The report stated:

“South Wales Wood is a company that turns wood and processes it into sawdust. However by doing that the sawdust blows everywhere. People are breathing it in. People have been sent to hospital and had eye splinters removed. The water in the dock is constantly getting polluted with rubbish and wood chips. Skin irritation.”

SWWP Ltd, Alexandra Docks have received reports of a similar nature of the previous few weeks however additional prevention / mitigation measures have been introduced prior to and following this incident.

GENERAL OBSERVATIONS

Discussions took place between NRW Officers and Mr. JACKSON regarding the reported incident (WIRS 2405388). On site housekeeping was to a good standard (see photos 1 and 2) with Mr. JACKSON indicating that the onsite road sweeper undertakes regular cleaning activities on the yard to minimise dusts / excessive woodchip as well as staff litter picking where required. Please ensure that housekeeping is maintained to a good standard to ensure the prevention and / mitigation of excess woodchip and dust.

On the reported incident, NRW Officers inspected the nearby dock where there were no waste woodchips present in the body of water (see photo 3). Further discussions took place with Mr. JACKSON regarding control measures to prevent / mitigate woodchip entering the watercourse. These included ensuring the stockpile of waste woodchip is within the agreed permitted height of 4 metres as identified within the sites FPMP (Fire Prevention and Mitigation Plan) document.

It was also suggested that metal barriers that were present on site and appeared to be redundant could be used near the water's edge to prevent any possible woodchip entering the dock when loading / unloading operations take place (see photos 4 and 5).

NRW Officers were satisfied that, at the time of the site inspection, there was no evidence of an environmental pollution however Officers did indicate to Mr. JACKSON of the requirement to abide by the agreed permit conditions under environmental permit (EPR-QB3093HE) as well as the associated documents in relation to the permit such as the FPMP, DEMP (Dust Environmental Management Plan) and EMS (Environmental Management System).



Photo 1 - Housekeeping and flooring infrastructure at SWWP Ltd, Alexandra Docks



Photo 2 - Housekeeping and flooring infrastructure at SWWP Ltd, Alexandra Docks



Photo 3 - Docks free of any woodchip waste(s) present within watercourse



Photo 4 - Waste woodchip in close proximity to dockside



Photo 5 - Metal barriers to potentially be used in woodchip stock management

NRW Officers Greg GARDNER and Jodie BASKERVILLE left site at 11:00am the same day.

If you have any issues with this report please contact Greg Gardner on greg.gardner@naturalresourceswales.gov.uk

Thank you.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 Waste compliance criteria (used in section 1 and 2):

1. Management

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A – Emissions to water, air or land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.