

Compliance Assessment Report CAR_NRW0045236

Permit being assessed: CB3896ZW.

For: Unit 15 Drome Road, **held by:** Telecycle Europe Limited

At: Deeside Industrial Park, Sealand Garden City, Deeside, Flintshire, CH5 2NY.

Type of assessment: Site Inspection,

Reason: Routine.

On: 12/09/2024 between 10:00 and 11:05.

Parts of permit assessed: 1.1.1, 4.2.

NRW Lead Officer: Ian Thomas2.

Report sent to: Jeremy Pudge, Compliance Manager, on 19/09/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W4B - Waste - Information - Reporting	Action only (X)	
W4A - Waste - Information - Records	Action only (X)	

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?

Criteria	Action needed	Complete by
W4B	Please report change of ownership.	31/10/2024
W4A	submit annual waste returns	31/10/2024

Compliance 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.

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

On Thursday the 12th of September 2024 Natural Resources Wales attended site.

This was a routine site inspection for permit ref EPR/CB3896ZW which was carried out by Waste Regulation Officer Ian Thomas.

On arrival at site, Ian met with Ryan Eaton, warehouse manager, who accompanied the officer throughout the visit. Dean Graham, site manager and Jeremy Pudge, TCM, were not on site but were at a trade show in Birmingham along with the owner of Telecycle.

The site is situated on a small industrial area and is one unit, consisting of one main warehouse space and office space above. The warehouse looked to be substantially busier from the last inspection.

Ryan explained that the bulk of activities at the moment is sorting and grading of circuit boards and small electronic devices for onward transport. Very little dismantling for recovery is taking place. As before, the permit allows the processing of catalytic converters, and the machine is located inside the warehouse, no catalytic converters are being accepted. The machine is not operational.

The TCM for the permit is Jeremy Pudge, Jeremy looks to be taking a more active roll at the site and is regularly on site looking after the permit side of the facility. This is a good step and all the signs are encouraging.

There are now an additional two full time members of staff, one in the warehouse and one in the office, this is consistent with the growth of the facility.

All work is carried out inside the warehouse, one forklift truck is used. Security for the warehouse and site is covered by intruder alarms and live video connection. Gas bottles for use on the forklift are securely locked away in a cage and a secure box is being installed at the front of the unit for access by emergency services in case of any incidents.

There is a vast improvement in relation to documents and paperwork available and recorded under the permit conditions. Waste transfer notes are available and filled out correctly. The site diary and visitor book are being utilised and copies of the permit and FPMP are kept in the office.

Prior checks showed that no waste annual waste returns had been received. If these have been sent please provide details. If they are outstanding, please complete waste returns by November 30th 2024.

Since the visit, Jeremy informed me by email that Majestic Corporation PLC have acquired Telecycle. Thank you for advising NRW of these details and please ensure this information is reported in the correct manner to permitting as required by permit ref 4.3.4 -

Natural Resources Wales shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- a. any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- a. any change in the operator's name or address; and
- b. any steps taken with a view to the dissolution of the operator.

In any other case:

- a. the death of any of the named operators (where the operator consists of more than one named individual);
- b. any change in the operator's name(s) or address(es); and
- c. any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

Thank you for assisting us with the inspection. Kind regards, Ian Thomas, Waste regulation Officer Please find your new regulating officer's contact details below. Email:

ian.thomas2@cyfoethnaturiolcymru.gov.uk

Natural Resources Wales, Chester Road, Buckley, Flintshire, CH7 3AJ In this document 'Natural Resources Wales' means the Natural Resources 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.