

Compliance Assessment Report CAR_NRW0045858

Permit being assessed: QB3093HE.

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

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

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

On 18/12/2024 between 10:30 and 11:30.

Parts of permit assessed: Various

NRW Lead Officer: Greg Gardner, accompanied by Chris Burge, Carla Curtis.

Report sent to: Ms. Rita VASSALLO, Technically Competent Manager on 20/01/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	Assessed (A)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	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 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

This report details the site visit made on the 18th December 2024 to South West Wood Products Ltd, Newport, permit reference number EPR-QB3093HE.

Natural Resources Wales (NRW) Officers Greg GARDNER, Carla CURTIS and Chris BURGE attended the South West Wood Products Limited (SWWP Ltd) site at Alexandra Docks, East Way Road, Newport, NP20 2NP for a planned routine site inspection at 10:30am where they were met with 3 members of SWWP Ltd Management. The weather was muggy, damp and reasonably cold at the time of the inspection. The site inspection was filmed by NRW Officer Chris BURGE who was in possession of an NRW issued body worn camera. SWWP Ltd Management were informed that the inspection was being recorded by NRW Officer BURGE with no objections raised.

ACTIONS FROM PREVIOUS SITE INSPECTION - 02/09/24 - CAR_NRW0045107

Compliance Criteria	Result	Conditions	Action Required	Remedial Action	Due Date	
(W3G) Fire	(C2) A non-compliance which could have a significant environmental effect	3.5.1	Reduce stockpiles of all waste(s) on site to the designated maximum stockpile sizes as detailed within your FPMP document and always ensure all waste(s) on site are in compliance with the maximum dimension sizes as detailed within your FPMP document (Ref: 2158A/FPMP) LJB/V1.4 16/04/2019.	Improve operations	31/10/2024	Score activ
(W3B) Emissions of substances not controlled by emission limits	(C2) A non-compliance which could have a significant environmental effect	3.1.2	Review dust management plan to ensure wood dust generated from on site operations is mitigated to minimise environmental impact and harm to human health. Submit amended dust management plan to NRW for review. Clean up excess wood dust from areas outside the site boundary to minimise environmental impact and harm to human health.	Improve operations	31/10/2024	Score activ
(W1A) General management	(C2) A non-compliance which could have a significant environmental effect	1.1.1(a)	Review your EMS and associated documentation that supports the EMS to ensure all operations on site abide by your environmental permit EPR/QB3093HE. Once amended please send to NRW for review. Repair all security fencing on site to ensure site is fully enclosed to prevent potential unauthorised access as well as install netting on security fencing to assist in dust mitigation	Improve operations	29/11/2024	Score activ

GENERAL OBSERVATIONS - SITE VISIT - 02/12/24

For information, NRW Officers Greg GARDNER, Carla CURTIS and Chris BURGE also attended the SWWP Ltd, Newport Docks site on 02/12/24 for an on site discussion with SWWP Ltd Management regarding the progress on the identified actions from the 02/09/24 site inspection (CAR_NRW0045107) as well as agreeing revised timelines for these actions. Upon arrival NRW Officers noted progress with regards to the action of reducing the wood stockpiles back into compliance with the sites FPMP which was positive to witness however further work was required in order for the action to be completed and bring the site back into permit compliance - see photos 1 & 2.

During the meeting, explanations were provided by SWWP Ltd Management for requesting extensions to the original agreed deadlines due to difficult operational circumstances outside of SWWP Ltd control. Following this, it was agreed between SWWP Ltd Management and NRW that extensions would be granted based upon these circumstances however that these

revised deadlines were final. It was also agreed that a site inspection would be completed on 18/12/24 with members of the SWWP Ltd Management present. See table 1 below for original and revised deadlines for the actions.



Photo 1 - Unprocessed wood stockpile at SWWP Ltd on 02/12/24



Photo 2 - Unprocessed / processed wood stockpile at SWWP Ltd on 02/12/24

EPR-QB3093HE – SWWP Ltd, Alexandra Docks

	Category 2 Breach	Original Deadline	New Revised Deadline	Comments
1	Reduce stockpiles of all waste(s) on site to the designated maximum stockpile sizes as detailed within your FPMP document and always ensure all waste(s) on site are in compliance with the maximum dimension sizes as detailed within your FPMP document (Ref: 2158A/FPMP) LJB/v1.4 16/04/2019.	29/11/24	17/12/24	To be completed ready for site inspection on 18/12/24

2	Review dust management plan to ensure wood dust generated from on site operations is mitigated to minimise environmental impact and harm to human health. Submit amended dust management plan to NRW for review. Clean up excess wood dust from areas outside the site boundary to minimise environmental impact and harm to human health.	29/11/24	Completed	Submitted to NRW on 27/11/24 for review. Once reviewed, outcome fed back to operator. Dust clean up evidenced on site (sweepers / litter pickers) and via photos from operator
3	Review your EMS and associated documentation that supports the EMS to ensure all operations on site abide by your environmental permit EPR/QB3093HE. Once amended please send to NRW for review. Repair all security fencing on site to ensure site is fully enclosed to prevent potential unauthorised access as well as install netting on security fencing to assist in dust mitigation	31/01/25	31/01/25	This action will be completed following the reduction of wood stockpile(s) to ensure access to area to restore damaged fencing. This works in conjunction with action 1 above.

Table 1 - Original and revised deadlines for actions from 02/09/24 site visit as well as action progress update

GENERAL OBSERVATIONS - SITE VISIT - 18/12/24

Upon arrival, the site was not operational. It was noted immediately by NRW Officers that the stockpiles of wood waste(s) were notably smaller than on previous visits and were in compliance with the sites Fire Prevention and Mitigation Plan (FPMP). An on-site street sweeper was operational picking up any excess dust both on and off site. It was also noted that on site dust suppression systems (mist cannon) was also operational. NRW Officers ventured to the site office for a discussion with SWWP Ltd Management with regards to the actions identified on the 02/09/24 site visit (CAR_NRW0045107). See photos 3-6.

During the discussion, it noted that further shipments of wood were planned in the coming weeks both by ship and by road to assist in the flow through of wood as well as intentions to potentially surrender the sites permit in the future. NRW Officers, prior to a walkaround the site informed SWWP Ltd Management of their appreciation of the work that had taken place to bring the site back into compliance with their permit as well as reiterate the importance and potential consequences of the permit future non-compliances.



Photo 3 - Unprocessed wood in compliance with sites FPMP document



Photo 4 - Unprocessed wood in compliance with sites FPMP document



Photo 5 - Streetsweeper operational on site picking up excess dust deposits**Photo 6 - Fire break between unprocessed wood stockpiles**

NRW Officers, following the discussion, ventured on to site and conducted a walk around site inspection. NRW Officers were satisfied with stockpile heights / size of unprocessed / processed wood and that they were in compliance with the sites FPMP document. It was also noted that firebreaks were also in place to prevent fire spread should one occur. During the walkaround, the site perimeter fencing still required attention however the deadline date for this action is 31/01/25. See photos 7 and 8. During the site visit, NRW Officers did not witness any excessive noise / dust as well as any offensive odours. It was also noted that there was a litter picker present off site as well as the street sweeper operating outside of the permitted boundary sweeping any excess dust / litter on the main roadway - see photos 9 and 10.

**Photo 7 - Perimeter fencing at SWWP Ltd, Newport**



Photo 8 - Perimeter fencing at SWWP Ltd, Newport



Photo 9 - Litter picking and street sweeping outside of SWWP Ltd site, Newport



Photo 10 - Litter picking and street sweeping outside of SWWP Ltd site, Newport**PERMIT SURRENDER**

During the site inspection, discussion took place regarding surrendering of the sites permit. If this is required then the site would have to be completely cleared and a site condition report submitted to NRW which would indicate that there was no contamination remaining prior to the surrendering. A final site inspection would be undertaken to determine if the site had been appropriately remediated. Details of a full and partial surrender of the permit can be found on the attached link -[Natural Resources Wales / Apply to surrender \(give up\) all or part of a waste permit](#)

NRW Officers left site at 11:30am 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.

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.