

Compliance Assessment Report CAR_NRW0046177

Permit being assessed: FB3390HM.

For: Griffiths Waste Solutions, **held by:** Griffiths Waste Solutions (gws) Ltd

At: Haverfordwest, Pems, SA62 4BW.

Type of assessment: Site Inspection,

Reason: Routine.

On: 17/01/2025 between 14:00 and 14:30.

Parts of permit assessed: Specified by Permit.

NRW Lead Officer: Angharad Clark.

Report sent to: Operator, Operations Manager, on 06/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	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

Angharad Clark attended site on 17th January 2025. The Operator was not on site.

The Operator of the permit is no longer at the site and the site is no longer being operated as a waste facility. The current occupant is a building operation, WB Griffiths Construction, but they do bring their own waste back to be segregated into skips before onward disposal. She met with the site Operations Manager who showed her around.

A Stop Notice is currently in force on the site, and the Operator cannot import waste to the site under the permit.

WB Griffiths Construction has made efforts to remove a large amount of the inert waste that was stored outside and is in discussions to have the waste stored in the shed removed. There is a significant amount of mixed waste in the shed. All waste transfer notes for all waste removed from the site must be kept and provided to NRW on request. Please see photos.

The Operations Manager stated that they may be interested in transferring the permit to themselves, depending on possible future diversification. Please see details of transfer of a permit in the link below:

<https://naturalresources.wales/permits-and-permissions/waste-permitting/apply-to-transfer-all-or-part-of-a-waste-permit/?lang=en>

Currently the waste being brought back to the site is generated by the WB Griffiths business and can be covered by Non Waste Framework Directive Exemptions, the details of which can be found in the link below:

<https://www.gov.uk/guidance/waste-exemption-nwfd-3-temporary-storage-of-waste-at-a-place-controlled-by-the-producer>

The waste being brought into the site from WB Griffiths Construction's activities must be stored within the rules of the Non-Waste Framework Directive exemption and must continue to be kept separate from the waste previously imported under the permit by the Operator.

Angharad Clark also informed the Operations Manager that should they wish to transfer the permit they would also need a Technically Competent Manager registered under WAMITAB (or other competence scheme). Please see details of this in the link below:

https://www.ciwm.co.uk/ItemDetail?iProductCode=OCSEEL&Category=MOODLE&gad_source=1&gclid=EAlaIqobChMlvcWn-a-viwMVJppQBh01QjuQEAAAYASAAEglZ5_D_BwE

Please contact us if you require further information following this compliance report.

END

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.

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.