

## Compliance Assessment Report CAR\_NRW0046257

**Permit being assessed:** DB3231RX.

**For:** Natural U K Ltd Healthcare Management Facility, **held by:** Natural U K Ltd

**At:** Unit 3, Capel Hendre Industrial Estate, Capel Hendre, Ammanford, Carmarthenshire, SA18 3SJ.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 23/01/2025 between 13:30 and 16:30.

**Parts of permit assessed:** Paperwork and site development.

**NRW Lead Officer:** Linda Warrick, accompanied by Michael Edwards.

**Report sent to:** Rhiannon Chapple, Technical Manager, on 13/02/2025.

### 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)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W3E - Waste - Emissions and monitoring - Monitoring	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

Linda Warrick and Mike Edwards visited the site to undertake a routine inspection. We did not inspect the site. We had a number of items to run through with the site management which comprised Rhiannon Chapple -Technical Manager, Rob Poyer - TCM and Director, Craig Masters - Operations Manager and Richard Jones - Projects Manager .

We discussed the following items:

A possible variation of the permit to set up a clinical waste material recycling facility with the aim to recover plastics from the clinical waste stream.

A possible variation to allow the Ecosteryl to process medicinally contaminated infectious healthcare waste. This will need to be line with EPR 5.07 and will require a justification for the treatment of waste contaminated with or containing any residual pharmaceuticals or hazardous chemicals. The site would need to demonstrate that the process is able to effectively treat the range of chemicals that may be present rather than dilute them with other wastes.

#### Pre Acceptance Audits

NUK conduct these for a number of healthcare sites including hospitals, vets, dentists, opticians and nursing homes. It is important that these are completed prior to accepting waste to ensure the characteristics of the waste are adequately assessed to ensure that the disposal or recovery method for the waste is compliant and appropriate. The PAAs should be completed on a regular basis as outlined in HTM 07-01.

The company has a robust system to ensure all PAAs are completed within the appropriate timescales with reminders to clients and emergency checklists if needed. There is a dedicated team to undertake the PAAs. They are to a good standard and follow the guidance set out in HTM 07-01. The only observation is that actions identified at some sites are sometimes not completed by the following audit. Working along with the producer to ensure waste is properly classified and coded is essential to ensure the most appropriate treatment or disposal route.

#### Technical Competence

Rob Poyer has been waiting for WAMITAB to forward his certificate for Level 4 HR06 (High risk operator competence for managing the physical and chemical treatment of hazardous waste). Since the site visit, I have now received the certificates which were issued on the 29/01/25 and meet all the required levels of competence for this type of facility.

**FPMP**

The updated FPMP has been received by ME and will be processed in due course

**Ecosteryl routine monitoring**

The treatment plant continues to be monitored with the routine efficacy testing being undertaken every 2 months. Emissions monitoring is repeated annually.

The plant will be recommissioned in August 2027.

The annual report (July 2024) identified that there were 2 failures at STAAT Level IV. Please ensure that any correspondence reflects that the plant can only currently meet STAAT Level III.

**End of Waste**

We discussed any material being used for products must meet End of Waste criteria. The site has been forwarded the documents associated with this.

All waste being treated by the Ecosteryl plant should be coded in line with EPR 5.07. Currently waste returns show that the waste is coded as 19 12 12 but should be coded as 19 02 10 or 19 02 99 whichever is the most appropriate. This would also be a more appropriate code for the Nappicycle process due to the physico/chemical nature of the process.

**Directly associated legislation**

I have reviewed an assortment of Duty of Care notes and Consignment notes

On reviewing a number of consignment notes there were no dual coding from healthcare waste leaving the Sancta Maria Hospital and Neath Port Talbot Hospital, for medicinally contaminated sharps and no dual coding for medicinally contaminated infectious waste. These waste streams must be accurately classified and described to ensure it is rendered safe at the appropriate downstream sites.

LW and ME left site at 16:30pm

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](mailto: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](mailto: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.