Cyfoeth Naturiol Cymru
Natural Resources Wales

Compliance Assessment Report CAR_NRW0048116

Permit being assessed: AB3998CJ.

For: Worldcare Recycling, **held by:** Worldcare Recycling Limited

At: Plot 2, Tremarl Industrial Estate, Llandudno Junction, Conwy, LL31 9PN.

Type of assessment: Site Inspection,

Reason: Routine.

On: 26/03/2025 between 10:00 and 12:00.

Parts of permit assessed: See below.

NRW Lead Officer: Sarah Walton, accompanied by Cheryl Griffiths.

Report sent to: Lee Jones, Director, on 02/05/2025.

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	C3 Minor	1.1.1
W2D - Waste - Operations - The site	C3 Minor	2.1.1
W2E - Waste - Operations - Waste acceptance	C3 Minor	2.3.2
W1A - Waste - Management - General management	C3 Minor	1.1.1
W1A - Waste - Management - General management	C3 Minor	1.1.1
W4A - Waste - Information - Records	Action only (X)	
W2F - Waste - Operations - Technical requirements	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
5	20

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
W1A	Clear and clean the mud and debris that has tracked onto public highway. Ensure EMS procedures are followed to prevent mud and debris leaving the permit boundary.	12/05/2025
W2D	Improve site infrastructure to ensure waste is only stored on hardstanding or an impermeable surface with a sealed drainage system	27/06/2025
W2E	Cease the acceptance of 17-09-04 (mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03) to site. EMS procedures must be followed to ensure only permitted waste enters site.	30/04/2025
W1A	Revise EMS procedures for waste acceptance and waste documentation, to make it clear exactly what waste types are permitted and what information is required from the waste producer. Ensure these procedures are followed and that staff are competent for the duties they are assigned.	09/05/2025
W1A	Revise and improve EMS procedures for waste storage, in line with guidance document 'How to comply with your environmental permit'.	30/05/2025
W4A	Please ensure delivery documentation for aggregate produced under WRAP Quality Protocol, contains essential information as per section 3.3.2 of WRAP's document.	01/05/2025
W2F	Submit evidence of technical competency as required by permit condition 1.1.4.	05/05/2025

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.

<u>You are non-compliant with your permit.</u>

<u>We are currently considering taking enforcement action against you for the non-compliance recorded above.</u> We will contact you in due course.

4. Details of our assessment

A routine site inspection took place on Wednesday 26th March 2025.
Waste Regulation officers Sarah Walton and Cheryl Griffiths met with staff on site.
Director, Lee Jones, was not present at the time of the inspection.
It did not appear there was anyone on site with knowledge of the permit. Therefore, officers walked around site unaccompanied.

<u>Permit Condition 1.1.1</u> ***"The operator shall manage and operate activities: (a) in***

accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints".
Outside the gates to the site, there continued to be mud and debris being tracked onto the public highway. This has been raised on previous CAR forms.

Photographs showing mud and debris leaving site & being tracked onto public highway

As can be seen from the photographs above, mud and debris continue to be tracked off site, meaning the road surface is no longer visible in parts. The amount of mud and debris could cause drains to block and could be a hazard to traffic, as it could cause skidding.

EMS condition 2.1.4 states *"Control of Mud and Debris Mud on the highways may result from vehicles leaving the site. The yard area will be maintained and pot holes filled as soon as is reasonably possible with suitable material to reduce the risk of water pooling on site. The access road and yard area will be monitored as part of the EMS for mud and in the event that mud is deposited on the highway outside the site entrance action will be taken to clean the road within that working day".*
This pollution outside the permit boundary has evidently built up over time, given the amount and dried nature of the mud. This shows the site Environmental Management System (EMS), is not currently effective and procedures are not being followed.
The permit has been scored a CCS C3 for this non-compliance.
ACTION: Clear and clean the mud and debris that has tracked onto public highway. Ensure EMS procedures are followed to prevent mud and debris leaving the permit boundary.

The above non-compliance is linked to an issue with the site surface where waste operations are taking place. The ground is unmade in parts, resulting in a thick layer of mud. Deep tyre tracks in the mud, suggests the ground is getting churned up by the machinery tracking back and forth.

Permit condition 2.1.1 states *"The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities")".*
Table S1.1. states ***"If the site is located outside a groundwater Source Protection Zones 1 or 2, then wastes listed in tables S2.1 and S2.2 may be stored and treated on hard-standing or on an impermeable surface with sealed drainage system".***

Photographs showing waste storage and ground conditions

The two photographs above show waste being stored on unmade ground. There is a significant amount of mud and an uneven, undulating surface. Waste should be stored on hardstanding or an impermeable surface with a sealed drainage system. As the ground is unmade, it is unable to cope with machinery and waste operations taking place, which has resulted in a build up of mud which is tracking off site.
As the site is not complying with permit condition 2.1.1, a CCS C3 score has been applied for this permit breach.
ACTION: Improve site infrastructure to ensure waste is only stored on hardstanding or an impermeable surface with a sealed drainage system.

Permit condition 2.3.2 ***"Waste shall only be accepted if: (a) it is of a type and quantity listed in schedule 2 table(s) S2.1 (S2.2 etc)".***

Upon arriving at Worldcare Recycling Ltd, waste was being deposited on site by an external company.

Photographs showing waste deposited on site 26.03.2025

This waste transfer note shows this waste incoming to site with LoW code 17-09-04, described as 'Mixed'.
The waste code 17-09-04 (mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03) is not listed in either table S2.1 or S2.2 of the site's permit.
The operator has therefore breached permit condition 2.3.2 by accepting a non-permitted waste.

As such, this has been scored a CCS C3 score.
This suggests an issue with the site's management system. There should be sufficient procedures in place to ensure only authorised waste types enter site.
As noted earlier, there did not appear to be competent persons on site, with sufficient knowledge of the site permit, so this may be one of the contributing factors to this permit breach.

Permit Condition 1.1.1 ***"The operator shall manage and operate activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints".***

The waste transfer note accompanying the accepted waste noted above, was not filled in sufficiently. There should be a full description of the waste to provide further detail on what exactly it is.
The transferor's address was noted as being 'Llandudno'. This is not enough information. Full names and addresses should be included.
The SIC code and waste carrier licence reference were also missing from the waste transfer note. Checks completed following the inspection, could not find any waste carrier licence for the company transferring waste.
The operator has breached their Duty of Care through failing to incorporate certain specified information on a transfer note, which is an offence under s.34(5) & 34(6) of the Environmental Protection Act 1990.

Duty of Care forms part of the site's Environmental Management System (EMS). On the inspection, it appeared staff who are not technically trained are assigning waste codes and descriptions to incoming waste from 3rd party businesses.
The site EMS states "*Under the Duty of Care all waste must be described adequately to allow the*
subsequent holder to deal with it in a way that will not cause pollution of the environment. It is therefore the responsibility of the producer of the waste to characterise the waste before it is accepted at the site".
Standard operating procedure 2 of the EMS goes on to state *"All waste carriers should be in possession of either: A waste transfer note specific to the load of waste being carried, in which case a copy must be attached to the conveyance note issued to the driver or a season ticket...".*
No waste transfer note was available from the waste carrier.

Point 3 of operating procedure 2 states:
"3) Waste reception
For each load of waste arriving at the site the following checks must bemade
• Check the details on the waste transfer note (including waste type(EWC Code), description, quantity, carrier and any waste characterisation information)
• Clarify any details with the driver if necessary
• Inspect the waste in the vehicle as far as possible (level 3 testing)
• Determine if the waste is permitted under the permit
• Make a full record of the waste received"

It is evident from the noted permit breaches, that the site is not following EMS

procedures for waste acceptance.

Page 30 of the EMS has a table titled 'Worldcare Recycling Flow Chat'. This clearly shows 17-09-04 as an input to the site. This should be removed from the procedures as this is not a valid waste type under the permit.

The above duty of care issues and lack of adherence to EMS procedures, has been assigned a CCS C3 score against permit condition 1.1.1.

ACTION: Revise EMS procedures for waste acceptance and waste documentation, to make it clear exactly what waste types are permitted and what information is required from the waste producer. Ensure these procedures are followed and that staff are competent for the duties they are assigned.

Walking around site, there was no clear definition between waste stockpiles.
The large stockpile in the centre of the site, had a screener in the middle of it. This had finer material at the end of one of the conveyors. There was a partially broken sign in this stockpile labelled '19-12-12'. The fines were not being kept separate from the other adjacent waste. There was also stagnant water beneath the machinery, mixed in with other waste.

There continued to be a large stockpile of fines at the rear of the site. The EMS' site plan shows this area is designated for storing 19-12-09 waste (Minerals).

The fines shown above are not minerals, but instead fines from the inert treatment process (19-12-11*/19-12-12). It is unclear how long this waste has been stockpiled here. The site is not storing waste in accordance with the EMS site plan.
Following the inspection, an email was sent to site requesting evidence of waste transfer notes for all 19-12-12 that has left site. A response was received stating no 19-12-12 waste has left site at all.
This information is contradictory to waste return documentation submitted by the site. Quarter 3 waste return shows 1,216.14 tonnes of 19-12-12 waste being removed from site.

Given the site is a waste treatment facility, there is always going to be some waste from the inert treatment process such as fines and contaminants that need to be removed and disposed of off site. There is concern about where residual waste from site is going, given there are no waste transfer notes to evidence removal of this waste stream.
In addition to this, it is possible waste is being stored indefinitely, rather than being moved onwards.

Large stockpiles of waste are frequently observed on site inspections. These stockpiles lack separation. There are no EMS procedures for managing the size of waste stockpiles and the length of time they are stored for.

On the previous CAR form issued to site on 06/09/2024 (CAR_NRW0045050), an action was placed on the operator to revise EMS procedures in line with guidance document 'How to comply with your environmental permit', with a focus on waste storage.
This action was not completed.
EMS procedures remain insufficient for waste storage.

Because the EMS procedures continue to be inadequate for managing risks from waste storage, a CCS C3 score has been applied against permit condition 1.1.1

ACTION: Revise and improve EMS procedures for waste storage, in line with guidance document 'How to comply with your environmental permit'.

ACTION: Provide waste transfer notes for the 1216 tonnes of 19-12-12 waste removed from site in quarter 3 2024.

ACTION: Provide details of all waste outputs from site. Specify what waste codes are removed from site and where they are removed to.

Following the inspection, the operator sent through delivery notes for 6F2 removal.

Conveyance notes were provided for removal of 6F5 granular fill, which contained a statement 'All aggregates for unbound and hydraulically bound materials are produced in accordance with BS EN 13242 / BS EN 12620.
There also needs to be statement confirming if the product has been produced in compliance with WRAP Quality Protocol.
Other information was missing from the delivery notes such as full customer name and contact details.
ACTION: Please ensure delivery documentation for aggregate produced under WRAP Quality Protocol, contains essential information as per section 3.3.2 of WRAP's document.

As can be seen above, it is clear the root cause of compliance issues at site is a lack of adequate EMS procedures as well as lack of adherence to the site's EMS.
This indicates a failure of management to maintain and and implement these procedures.
A such, NRW is considering an Environmental Permitting Regulations 2016 Regulation 36 Notice, requiring revision of the site's Environmental Management System.

Permit condition 1.1.4 ***"The operator shall comply with the requirements of an approved competence scheme"***.

Due to the issues concerning the environmental management of site operations, please submit evidence of technical competency to NRW.
Submit evidence of both the primary competence qualification as well as the most recent continuing competency certificate.

ACTION: Provide evidence of technical competency as required by permit condition 1.1.4

Thank you to all staff who assisted officers with the inspection.

Should you wish to discuss or query anything in this CAR form, please get in touch using the details below.

Kind Regards,

Sarah Walton
Swyddog Rheoleiddio Gwastraff / Waste Regulation Officer
Gogledd-Orllewin / North West

Ffôn/ Phone: 03000 655 023

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.