

## Compliance Assessment Report CAR\_NRW0048561

**Permit being assessed:** CB3398ZF.

**For:** Forward Waste Management East Moors Road Hazardous Waste Transfer Station,  
**held by:** Forward Waste Management Ltd

**At:** 122-128 East Moors Road, Cardiff, CF24 5EE.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 13/06/2025 between 12:30 and 14:00.

**Parts of permit assessed:** 2.2, 2.3.1, 2.3.2, 3.7.1.

**NRW Lead Officer:** Dale Padfield.

**Report sent to:** -, SHEQ Manager, on 17/06/2025.

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

| Part of permitted activity assessed (compliance criteria) | Assessment result | Permit condition |
|-----------------------------------------------------------|-------------------|------------------|
| IR2B - Installations - Operations - The site              | Assessed (A)      |                  |
| IR2C - Installations - Operations - Operating techniques  | Assessed (A)      |                  |
| IR3I - Installations - Emissions and monitoring - Fire    | Assessed (A)      |                  |
| IR4A - Installations - Information - Records              | Assessed (A)      |                  |
| IR1A - Installations - Management - General Management    | 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 |
|----------|---------------------------------------------------------------------------------------------------------------|-------------|
| IR1A     | Action 1 – Forward Waste Management Limited – 17th June 2025: Please produce a climate change adaptation risk | 31/12/2025  |

| Criteria | Action needed                                      | Complete by |
|----------|----------------------------------------------------|-------------|
|          | assessment and provide NRW with a copy for review. |             |

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

Forward Waste Management Limited

EPR/CB3398ZF

This compliance assessment report details the site inspection undertaken on June 13, 2025. The visit was conducted as part of our proactive compliance work. The visit consisted of a site walk over and a light touch audit of various aspects as detailed below.

#### Site inspection

The site appeared well maintained, and waste was correctly and neatly stored within the various external and internal bays and storage areas. Maintaining wastes below site storage capacity was discussed, FWML described their process for ensuring waste is only accepted if the site has the capacity to store it. This is managed through both the site chemist and booking department to ensure storage capacities are effectively managed, which includes consideration for ensuring availability at receiving sites prior to accepting. Additional resource is allocated for wastes requiring incineration, due to the limited availability and lead time required for this disposal route. FWML demonstrated an excellent understanding of managing this aspect.

Two waste consignments were seen to be stored in the quarantine area. The reasoning for the waste being quarantined was discussed along with the details of the non-conforming waste described. FWML demonstrated excellent use of the sites non-conformance procedure.

The site surfacing around the unloading area appeared to be in very good condition, some patches around the site appeared slightly damaged / cracked, although the damage may be superficial. FWML are advised to ensure site surfacing remains in good condition and any damaged areas are repaired or monitored to ensure they will not provide a pathway for spillages etc to enter the ground.

Site security and security procedures were well managed, the main entrance gate was locked on arrival along with the office entrance and the perimeter fencing was in good condition. The site benefits from CCTV coverage with thermal imaging capability, the CCTV is managed by a third party during out of hours, providing 24/7 coverage.

As detailed in the permitted operating techniques 'planned preventative maintenance regime' (PPM) the operator is required to inspect and record various aspects of the site, operations, and infrastructure, as required by permit condition 2.1.3(a). The operator records these checks on form 'ISO 0524', the form for the week commencing 9/06/2025 was seen to be completed and was up to date. The site benefits from a 36,400L underground bunded tank, as part of the PPM, the tank undergoes an annual inspection to ensure it remains fit for purpose. The most recent inspection report 02/06/2025 was seen, with the report concluding the tank remains in a satisfactory state. The operator demonstrated that these aspects of the PPM continue to be implemented inline with the permit requirements.

The training aspect of the Fire Prevention and Mitigation Plan (FPMP) was assessed. The operator demonstrated that staff training is maintained, with staff undergoing fire warden training, and certificates to demonstrate this were provided. The report detailing the annual fire exercise drill, conducted on 16/05/2025 was provided. The report logged sufficient detail of the drill, including time to evacuate all staff along with aspects that went well and any areas where improvements could be made.

The operator discussed being in the process of assessing their scope 1 and scope 2 CO<sub>2</sub> emissions, with the aim of reducing their carbon footprint where possible. The nature of the operations will likely result in minimal savings potential on site, with the majority of scope 1 emissions arising from the transportation fleet. When considering the carbon footprint of the transportation fleet, other operators have made successful carbon savings through switching to lower carbon footprint fuels such as HVO as a diesel alternative, FWML may want to explore this avenue.

A waste delivery was undertaken during the visit, which provided an opportunity to witness and audit the operators waste acceptance procedure.

The following observations were made:

The delivery truck entered the site and parked within the bunded area, with the entrance gate locked. The site chemist undertook a visual inspection from the ground, as a first 'sense check' to ensure the load looked to comprise of the expected delivery and assessed this against the consignment note and the chemist acceptance form.

The various items were then offloaded from the trailer, this is usually undertaken by a yard operative, however, on this occasion the site chemist unloaded the trailer. All packages were placed within the bunded area for inspection.

The site chemist then described the process of assessing the various wastes, as described below.

**Oily rags:** The consignment consisted of a cut-off IBC filled with separately bagged 'oily rags'. Each bag would be opened and visually assessed to ensure it contained a waste consistent with the description. Olfactory checks are also used, the site chemist indicated that with this consignment an unusual odour was present, consistent with a detergent-type odour, suggesting there may be non-confirming waste within the consignment. Several of the bags were opened and checked to demonstrate the procedure. One bag contained what appeared to be an oily sludge & debris, which was deemed to not conform with the consignment note. An overview of the next steps was provided,

including details of the non-conformance procedure. Once the entire consignment is assessed, a consignment note would be raised and the load sent to the sister FWML site to be baled.

**Empty Drums:** Drums are checked to ensure they are ‘nominally’ empty. The operators criteria is <1% of the container. The drums were opened and checked with a dipstick. The consignment of drums were confirmed to be empty, and would be placed into the appropriate storage bay. The operator confirmed implementation of the waste hierarchy, whereby, drums that are in good condition are not crushed but are sent for re-conditioning to be re-used.

**Waste oil:** The site chemist confirmed the process for checking the waste oil, including the sampling that would be undertaken, and compatibility tests prior to any bulking. The oil is analysed for various components to ensure consistency with the pre-acceptance criteria.

**WEEE:** The process of sorting WEEE was described, including the various checks and ensuring items containing PCB’s are separated and checks for non-conforming items.

All aspects of the waste acceptance witnessed during the visit where in line with the FWML waste acceptance procedure, the site chemist demonstrated detailed understanding of the processes and procedures.

#### Other business

As discussed during the visit, NRW had recently undertaken an email survey campaign to assess if installations had considered climate change adaptation (CCA) within their EMS and procedures. Based on the feedback from this initial survey, NRW will be requiring installations to undertake a climate change adaptation risk assessment, with a proposed deadline of April 2026. As discussed during the visit, the scale of the risk assessment should be proportional to the site and operations, guidance on undertaking the CCA risk assessment can be found in ISO 14090 and ISO 14091. As such, an action will be issued for FWML to provide a copy of the CCA risk assessment for review by the end of this year (2025).

**Action 1 – Forward Waste Management Limited – 17<sup>th</sup> June 2025:** Please produce a climate change adaptation risk assessment and provide NRW with a copy for review. **Due 31/12/2025**

End.

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 Industry compliance criteria** (used in section 1 and 2):

**1. Management**

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

**2. Operations**

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

**3. Emission and Monitoring**

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

**4. Information**

- IR4A – Records
- IR4B – Reporting
- IR4C – 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.