

Compliance Assessment Report CAR_NRW0048551

Permit being assessed: CB3091ZE.

For: Bryncir Quarry, **held by:** Cambrian Services Limited

At: Bryncir Quarry, Llecheiddior, Uchaf Bryncir, Garndolbenmaen, LL51 9LX.

Type of assessment: Site Inspection,

Reason: Routine.

On: 15/05/2025 between 10:30 and 12:35.

Parts of permit assessed: As below. .

NRW Lead Officer: Leon Williams, accompanied by Sarah Walton, Ricky Hartleb.

Report sent to: Graham Gibson , TCM , 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
W1A - Waste - Management - General management	C3 Minor	1.1.2
W1A - Waste - Management - General management	C3 Minor	1.1.4
W2A - Waste - Operations - Permitted activities	Action only (X)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W4A - Waste - Information - Records	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
2	8

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	Please ensure that a TCM attends the site to the appropriate standards, making and retaining the relevant records.	31/12/2025

Criteria	Action needed	Complete by
W1A	The technically competent manager for the Bryncir waste transfer station should hold a primary qualification as required by the CIWM Operator Competence Scheme.	31/12/2025
W2A	Develop the relevant procedural documentation in accordance with the WRAP quality protocol to enable inert wastes such as concrete, bricks, tiles and ceramics to meet end of waste status.	30/09/2025

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

Routine site inspection conducted by Natural Resources Wales (NRW) Senior Waste Regulation Officer Leon Williams, Waste Regulation Officer Sarah Walton and Tackling Waste Crime Officer Ricky Hartleb at Bryncir Quarry waste transfer station.

Present on behalf of Cambrian Services Limited were Arwyn Evans, Graham Gibson, Sam Higgitt, Stephen Blunt and Craig Taylor.

Also present during this visit was Rhys Cadwaladr, Senior Minerals and Waste Planning Officer of Gwynedd Council, David Harries of Aaron & Partners LLP and Marco Muia of Oaktree Environmental Limited.

The weather was dry and sunny during the inspection.

W1A - General Management

NRW received a draft version of a new Environmental Management System (EMS) for the Bryncir waste transfer station on the 13 May 2025. This new EMS has been prepared by Oaktree Environmental Limited.

ACTION: Please ensure that appropriate waste storage procedures are added to the EMS as outlined on page 35 in guidance document "how to comply with your environmental guidance" by the 31 July 2025.

Please ensure that a copy of the finalised EMS is sent to NRW by the 31 July 2025.

Discussions took place regarding proposals to expand waste operations at the site, which will require the submission of a permit variation.

Technical Competence

Technically Competent Manager (TCM) duties at the Bryncir Quarry waste transfer station are currently undertaken by Graham Gibson.

During the inspection, records confirming the attendance of the Technically Competent Manager (TCM) and the tasks completed at Bryncir Quarry waste transfer station were unavailable for inspection. This issue was discussed with Arwyn Evans, who acknowledged that appropriate TCM attendance at the site had not been maintained.

The technically competent manager must be in a position to oversee and direct site activities with attendance standards having been impacted by the sites 2024-2025 compliance band.

Further information regarding TCM site attendance can be found on page 37 in guidance document "how to comply with your environmental permit".

As the operator has been unable to produce records demonstrating sufficient TCM attendance at the Bryncir Quarry waste transfer station a CCS Category 3 breach has been recorded against permit condition 1.1.2.

Upon request of NRW, Cambrian Services Limited have submitted a WAMITAB certificate titled "Provisional Certificate of Technical Competence" dated March 1995 in the name of Graham Gibson.

CIWM have advised that provisional certificates of technical competence were issued to cover a grace period until members completed their qualification to achieve a full certificate of technical competency.

CIWM have confirmed that Graham Gibson does not hold a certificate of primary competency.

We acknowledge that a continuing competence certificate has been achieved by Graham Gibson in February 2025, however this qualification alone is not sufficient to meet the requirement of the competency scheme.

As a result, a CCS Category 3 breach has been issued against permit condition 1.1.4.

Positive discussions have taken place with Cambrian Services Limited following the inspection, during which the need to train staff at the Bryncir Quarry waste transfer station was acknowledged, ensuring they achieve technical competence and are able to carry out their duties effectively on site.

This proposal should be made a priority for the company and to include primary competence certification.

W2A - Permitted activities

At the time of this inspection, NRW Officers observed a pile of crushed concrete waste within the sites permitted operations boundary.



Located outside this boundary were stockpiles of processed waste sand. Cambrian Services Limited have developed a production control document in accordance with the WRAP quality protocol to enable waste sand to meet end of waste status.



ACTION: A separate production procedure will need to be developed in accordance with the WRAP quality protocol to enable wastes such as concrete, bricks tiles and ceramics to be processed into aggregates that meet "end of waste" status.

Please create and send NRW a copy of this procedure for review by the 29 August 2025.

The crushed concrete waste stored on site was described by the company as "6F5". This is a commonly used term in the industry to describe recycled inert waste; however, it does not guarantee that the processed waste meets "end-of-waste" status.

Please note that end-of-waste status for processed inert wastes cannot be achieved without an appropriate production control procedure and relevant sampling analysis.

Waste management controls apply to the handling, transport and use of recycled aggregates that have been processed outside the scope of the WRAP quality protocol which do not achieve "end of waste" status.

W4A - Records

Corrected waste return submissions have been received for quarters Q1, Q2, Q3 and Q4 of 2022. Thank you for completing this action.

Waste transfer notes and sampling analysis relating to the processed waste sand at the site were made available during the inspection in compliance with permit condition 4.1.2. .

Thank you also for your time during the inspection. If you have any further queries following the issuance of this report, please do not hesitate to contact us.

Diolch yn fawr,

Leon Williams

Uwch Swyddog Rheoleiddio Gwastraff / Senior Waste Regulation Officer

Cyfoeth Naturiol Cymru / Natural Resources Wales

www.cyfoethnaturiol.cymru / www.naturalresources.wales

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.