

Compliance Assessment Report CAR_NRW0048628

Permit being assessed: BB3697ZN.

For: New Horizon Plastics Co Ltd, **held by:** New Horizon Plastics Co Ltd

At: Unit 27 & The Former Scrapyard, Gelicity House, Castle Park Industrial Estate, Flint, Flintshire, CH6 5XA.

Type of assessment: Site Inspection,

Reason: Routine.

On: 23/06/2025 between 11:20 and 12:05.

Parts of permit assessed: 1.1.1, 3.1 3.2.

NRW Lead Officer: Amy Henderson, accompanied by Carys Williams.

Report sent to: Phillip Thomas, Company Director, on 04/07/2025.

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	Action only (X)	
W3A(3) - Waste - Emissions and monitoring - Emissions to land	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W2A - Waste - Operations - Permitted activities	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?

Criteria	Action needed	Complete by
W1A	With regard to the current infrastructure work, ensure all site plans/EMS/FPMP are accurate and submitted to NRW for approval with any changes. Please note any changes to	01/08/2025

Criteria	Action needed	Complete by
	these documents/activities which are incorporated under the permit may require a permit variation. This should be granted before any relevant activity commences.	

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

This was a routine unannounced site inspection carried out by Waste Regulation Officer Amy Henderson, accompanied by Waste Regulation Team Leader Carys Williams.

The weather at the time was dry.

On arrival at the site Officers inspected the areas surrounding the perimeter of the permitted site, including the footpath which runs adjacent to the site. There was no evidence identified of any windblown plastic from the site.

Officers then met with Company Director Phillip Thomas who accompanied us throughout the visit. We were later joined by Company Director Karyn Thomas also.

Officers first visited the permitted area named 'the Former Scrap Yard'. At the time of the inspection the site was currently having some infrastructure work carried out and some of the equipment had therefore been moved to allow for concreting of the site. The majority of operations had been temporarily put on hold whilst this work was taking place. The site was therefore less busy than usual with minimal activity taking place.

Some waste was identified to the front of the concrete block storage bays. Although this was not a significant quantity, the site was reminded that the bays are there to prevent fire from spreading and therefore it is important that waste storage remains within the boundary of these bays.

During the last site inspection it was stated that the site planned to install another underground water storage tank to the rear of the site. During this inspection it was stated the site no longer has plans to do this.

Officers then visited the area of the site referred to as 'Unit 27'. This area was also having infrastructure work carried out and the majority of activity had been temporarily put on hold whilst concreting and other work was taking place.

The effluent treatment plant previously located within this area of the site has been removed and it was stated that this is being replaced with a centrifuge system. The site

confirmed water will still be reused on site and there will be no discharges offsite from this system.

Within the treatment building, the bagging area has now been moved to one single location. This has been done to streamline operations and also enables the site to dry the granules. An action has been given to ensure this is listed on the sites FPMP/EMS and a copy sent to NRW for approval.

The site was reminded to ensure they remain in compliance with the activities on their permit. This includes any aspect of the EMS/FPMP which has been incorporated into the permit. Any changes which deviate from this will need to be agreed in writing or be submitted through a permit variation if required. As there is current infrastructure work taking place, please ensure all site plans/EMS/FPMP are accurate. Please note that changes to any aspect of the EMS/FPMP which have been incorporated into the permit, can only be agreed locally if they do not increase the risk of the activity.

There were no permit breaches identified as a result of this site inspection.

Thank you for your time during the site inspection. Should you have any queries regarding this CAR form please contact amy.henderson@cyfoethnaturiolcymru.gov.uk

Kind regards

Amy Henderson

Swyddog Rheoleiddio Gwastraff / Waste Regulation Officer

Cyfoeth Naturiol Cymru / Natural Resources Wales

Swyddfa Bwcle / Buckley Office

"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.