

Compliance Assessment Report CAR_NRW0046662

Permit being assessed: AB3494CM.

For: Llechwedd Quarry, **held by:** Northern Welsh Recycling Ltd

At: Blaenau Ffestiniog, Gwynedd, LL41 3NB.

Type of assessment: Site Inspection,

Reason: Routine.

On: 20/03/2025 between 12:05 and 13:45.

Parts of permit assessed: As below.

NRW Lead Officer: Cheryl Griffiths, accompanied by Leon Williams.

Report sent to: Andrew Carson, Director , on 19/08/2025.

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
W2E - Waste - Operations - Waste acceptance	C3 Minor	2.2.1
W2D - Waste - Operations - The site	Assessed (A)	
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
W4B - Waste - Information - Reporting	C3 Minor	4.2.2

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

Total non-compliances recorded	Total non-compliance score
3	12

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	Update your WRAP Factory Production Control Manual as outlined below.	31/10/2025

Criteria	Action needed	Complete by
W2E	Please ensure to follow waste acceptance procedures as outlined in EMS.	31/08/2025
W3B	Please consider taking action reduce dust emissions from site if identified as causing pollution.	31/08/2025
W4B	To record movements of all waste types on quarterly waste returns	31/08/2025

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

This was an unannounced routine site inspection for Northern Welsh Recycling Ltd, Llechwedd Quarry, Blaenau Ffestiniog, Gwynedd, LL41 3NB conducted by NRW Waste Regulation Officer Cheryl Griffiths and Senior Waste Regulation Officer Leon Williams on Thursday the 20th of March 2025.

Present on behalf of Northern Welsh Recycling Ltd were company Director Andy Carson and the sites Technical Competent Manager (TCM) Sean Carson.

We discussed the use of a U1: use of waste in construction exemption and the future plans of Northern Welsh Recycling Ltd and how the company wishes to construct vehicle protection bunds on site. Natural Resources Wales is aware that a U1 waste exemption was registered on the 17th of March 2023 and is due to expire on the 17th of March 2026, referenced as [NRW-WME084657](#) and bunds have previously been constructed at this site under this exemption.

Please note that each waste exemption has conditions that must be complied with. The relevant conditions for a U1: Use of waste in construction exemption can be found here: <https://www.gov.uk/guidance/u1-waste-exemption-use-of-waste-in-construction>.

Permit conditions assessed:

W2D - The site

2.4.1 - The activities shall not extend beyond the site, being the land shown edged in green on the site plan attached to the permit.

NRW officers firstly assessed the site boundary which was guided by Andy Carson. The waste operations were contained within the permitted boundary. It was mentioned by Andy, that the quarantine area of the site will potentially be moving to another area within the permit boundary.

If you decide to go ahead with any changes to the site plan for Northern Welsh Recycling Ltd, please ensure that you update your environment management system (EMS) if the layout of the site is to change within the permitted boundary.

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W2E - Waste acceptance**2.2.1 - Waste shall only be accepted if:**

(a) it is of a type and quantity listed in table 2.2 below; and

(b) it conforms to the description in the documentation supplied by the producer and holder.

During our visit, we came across stockpiles of mixed construction and demolition wastes which were contaminated with plastics, wood, metal, plasterboard, textiles and electrical waste. An example of this can be seen below in Photograph 1. Also during our visit, a third party waste carrier deposited similar contaminated waste at the time of the visit. NRW hold concerns that no apparent waste acceptance checks were made prior to this waste being deposited on site.

As stated under heading 4: waste acceptance checks in your Environment Management System (EMS) outlines that: “initial inspection of load and documentation at the weighbridge and a more thorough check upon discharge at the tipping location. Any non-compliant waste found will either be reloaded on to the vehicle before leaving or moved to the designated quarantine area pending removal.”

It did not appear that these waste acceptance checks were undertaken during our visit.

Northern Welsh Recycling Ltd is aware of the ongoing issue of non-permitted waste being accepted at their site and is working with the waste producer to improve their operations to prevent further contaminated waste being accepted on site.

ACTION: Northern Welsh Recycling Ltd is required to follow their waste acceptance procedure as stated within their EMS and to ensure that contaminated loads are rejected prior to deposit on site.

A CCS Category 3 score has been issued in response to this non-compliance against permit condition 2.2.1.



(Photograph 1- contaminated stockpile)

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W1A - General management

1.1.1 -The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises the 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.

An Environmental Management System (EMS) must explain how an operator will comply with all relevant environmental and waste legal duties. This includes identifying legal requirements, meeting any standards or requirements in guidance and codes of practice, quality protocols, assurance schemes, as well as other regulations that relate to environmental protection. The latter includes regimes such as Duty of Care.

The WRAP Quality Protocol is a framework developed to define when waste materials, specifically aggregates produced from inert waste, can be considered fully recovered and no longer classified as waste. Northern Welsh Recycling Ltd have developed a Factory Production Control Manual (FPC) which is a requirement outlined in the WRAP Quality Protocol guidance document:

[LIT_8709_c60600.pdf](#)

Section B2.0 of the document states that a “FPC is required to include the following quality management requirements set out below”:

- B2.1 General points about the procedures
- B2.2 Waste acceptance criteria
- B2.3 Production and testing
- B2.4 Training

- B2.5 Records
- B2.6 Documentation
- B2.7 Testing
- B2.8 Minimum testing requirements – frequencies
- B2.9 Departure from minimum test frequencies

NRW have reviewed Northern Welsh Recycling Ltd's current Factory Production Control Manual (FPC) and we have concluded there are insufficient written procedures as required above under section B2.0 of the WRAP Quality Protocol procedural document.

ACTION: Please review the requirements of Section B2.0 to B2.9 of the WRAP Quality Protocol procedural document, updating and expanding upon Version 1 of Northern Welsh Recycling Ltd's Factory Production Control Manual by the 31 October 2025.

Please be aware that processed inert waste cannot meet end of waste status without full compliance with the WRAP quality protocol.

Please also be aware that soils are specifically excluded from the WRAP Quality Protocol. Page 18 of the guidance document states "*For the avoidance of doubt, clays and soils are not considered to be aggregates for the purposes of this Quality Protocol.*"

At present there are no end of waste regulations, quality protocols or resource frameworks which enables soils treated at waste transfer stations to meet end of waste status.

The onward recovery or disposal of waste silts and soils transferred from Northern Welsh Recycling Ltd's waste transfer station in Blaenau Ffestiniog must be made at sites which benefit from either a relevant environmental permit or waste exemption.

All movements of waste soils from Northern Welsh Recycling Ltd's waste transfer station must also comply with the requirements of Section 34 of the Environmental Protection Act 1990 and Control of Pollution (Amendment) Act 1989.

We have issued a Category 3 CCS score for this non-compliance against permit condition 1.1.1(a).

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Environmental Management System (EMS)

We also requested a copy of the most up to date written Environment Management System (EMS) which Sean Carson provided following our visit. NRW have reviewed the EMS and have identified areas which requires further attention.

ACTION: Please make the amendments to the EMS as outlined below:

- **To remove point 3 from the 'Non-compliant Waste' procedure which states that "the site is permitted to receive other waste types from various industrial processes such as waste from wood processing, waste from thermal processes, waste packaging, waste**

from treatment plants and waste from municipal sources. The full detailed list is available to view at the site office. These waste types will be received by prior arrangements and will be communicated to all members of staff prior to arrival on site".

- Please note, Northern Welsh Recycling Ltd is only permitted to accept waste which are listed in table 2.2. of your environmental permit.
- To add a step in your procedures to notify NRW with written confirmation without delay of any incidents that may or have caused pollution.
- To add a step in your procedures to notify Natural Resources Wales without delay following the detection of any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution as stated in permit condition 4.3.1(a).
- Waste storage procedures outlining:
 - The storage times and procedures to ensure that these times are not exceeded.
 - maximum storage capacities for specified storage areas and the facility as a whole and procedures to ensure that these capacities are not exceeded.
 - maximum storage heights to prevent or minimise the emission of dust, litter and throughput management.
 - a procedure to identify the specific waste types stored at your facility.
 - procedures to segregate incompatible wastes for example use of appropriate separation distances and or suitable engineering measures.

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W1A - General management

1.1.4 - Northern Welsh Recycling Ltd is currently compliant with the requirement of an approved competence scheme and provided NRW with a copy of the certification. During our visit, NRW received a copy of the certificate which confirms that Sean Carson has met the relevant requirements as the Technical Competent Manager (TCM) for Northern Welsh Recycling Ltd.

Please note that this certification is only temporary until the 8th of August 2026 and it's Northern Welsh Recycling Ltd's responsibility to ensure that this is renewed beyond this date to remain compliant.

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W3B - Emissions of substances not controlled by emission limits

3.1.1 – We discussed emissions pollution which may be generated on the site such as dust with Andy Carson. There was no significant issues during our visit, however the dust levels would

increase when a waste carrier would arrive on site.

ACTION: NRW suggests that you follow your emissions management plan within your EMS to mitigate dust pollution.

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W4B - Reporting

4.2.2 – We discussed quarterly waste returns with Northern Welsh Recycling Ltd, as it came to our attention that the company have declared that no waste was removed from the site in 2024. After NRW reviewed your records, it was identified that waste soil was removed from the site in 2024. To note, as end of waste cannot be achieved for soils, all movements of waste including soil should be declared in your quarterly waste return submissions.

ACTION: To record movements of all waste types on quarterly waste returns.

A CCS Category 3 score has been issued in response to this non-compliance against permit condition 4.2.2.

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Duty of care:

NRW officers reviewed waste transfer notes that Northern Welsh Recycling Ltd had recently produced.

We discussed how the mechanical treatment of waste may result in a change of its classification, and outlined the operator's legal responsibility to ensure that the revised classification is accurately documented in all relevant records, in compliance with applicable regulatory requirements.

As stated in Section 35 of the Waste (England and Wales) regulations 2011, it is the operators responsibility to identify the waste to which it relates by reference to the appropriate codes in the List of Wastes for all of your waste transfer notes.

When you transfer waste, you must ensure that a written description of the waste is agreed and signed by you and the next holder. The description is part of the waste information you must provide. You should do this by using waste transfer note. On the waste transfer note you must provide;

- accurate description/ classification of the waste,
- its quantity and nature and whether it is loose or in a container,
- if in a container, the type of container,
- the time and place of transfer,
- the SIC code of the transferor (current holder of the waste),
- the name and address of the transferor and transferee (person receiving the waste) and their signatures,
- the capacity in which the transferor and transferee are acting (e.g. as a producer, importer or registered waste carrier, broker or dealer) and their relevant authorisation to act in that

capacity (e.g. their permit number or registration number).

ACTION: Please ensure that all documentation including waste transfer notes are completed correctly in accordance with Section 34 of the Environmental Protection Act 1990.

If you have any further questions about the contents of this inspection report, please do not hesitate to contact us.

Yours faithfully,

Cheryl Griffiths

Waste Regulation Officer

Natural Resources 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.

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.