

Compliance Assessment Report CAR_NRW0049326

Permit being assessed: DB3231RX.

For: Natural U K Ltd Healthcare Management Facility, **held by:** Natural U K Ltd

At: Unit 3, Capel Hendre Industrial Estate, Capel Hendre, Ammanford, Carmarthenshire, SA18 3SJ.

Type of assessment: Audit,

Reason: Routine.

On: 19/08/2025 between 10:30 and 15:00.

Parts of permit assessed: Nappicycle process and Microwave process.

NRW Lead Officer: Linda Warrick, accompanied by Liane Bacon-Weekes.

Report sent to: Rhiannon Chapple, Technical Manager, on 22/09/2025.

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	Assessed (A)	
W2C - Waste - Operations - Operating techniques	Assessed (A)	
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	Assessed (A)	
W4A - Waste - Information - Records	C3 Minor	1.1.1

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

Total non-compliances recorded	Total non-compliance score
1	4

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
W4A	Update EMS to reflect current operations	10/10/2025

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.

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

Linda Warrick and Liane Bacon-Weekes visited the site at 10:30 am. The weather was warm and dry. We were met in reception by Robert Poyer (CEO of NUK). Rhianon Chapple (Technical Manager) and Craig Masters (Business manager) also accompanied both officers for a tour of the site.

This is the first visit to the site by LBW so we asked to be shown through the cradle to grave activities.

It was explained that there are now three different processes being undertaken at NUK:

- 1 - The original Nappi cycle process
- 2 - The mechanical treatment of nursing home waste
- 3 - The microwave sterilisation of infectious non-medicinally contaminated clinical waste

NUK staff showed NRW Officers around process 1 and 3. NUK staff described each step of the process.

NRW officers requested an updated process flows for the Nappi cycle waste stream. This was received on the 4th of September.

1 - The Nappi cycle process had been adapted in recent months to include some new methods to further improve the quality of the fibre pellets produced. Please provide updated EMS to allow for these changes to reflect current working practices.

Recent issues with Dwy'r Cymru regarding the sewer network has resulted in all sewage discharge from the Nappi cycle process being tankered away. This too needs to be reflected in the current EMS. Please provide an updated EMS for these operations by the **10th of October**.

Duty of Care notes are required for auditing processes and NRW requested notes for the effluent leaving site from the October 2024. However NRW has only received Duty of Care Notes for this activity since July 2025.

Please provide analysis of the effluent to back up coding 16 10 02 **by the 10th of October**.

The operator has stated that material leaving the site from the Nappi cycle process is going as a replacement virgin pulp material for road construction. Please provide NRW with an updated EoW assessment based on the most recent outlet and production specification.

Please be aware that any information provided to NRW can be subject to the Environmental Information Regulations 2004 and the Freedom of Information Act 2000.

2-The waste material resulting in basic **mechanical treatment** of the nursing home non infectious clinical waste is currently being landfilled as 19 12 12. Officers did not have time to view this operation. LW requested photographs to be sent through of the process. These were received on the 4th of September 2025. Please provide an updated EMS which reflects this activity by the **10th of October**.

Clinical waste storage

Officers viewed the hazardous clinical waste storage compound. All waste was placed in sealed locked containers. All the containers were clearly labelled. Anatomical waste was not kept in a refrigerated unit. This is a requirement due to the length of time this waste is stored on site prior to leaving for incineration. Following discussions in the meeting on site, NRW have been forwarded photographs of a lab fridge which was installed the following week. The photographs show that the fridge is clearly labelled. Please ensure there is a procedure in the EMS which reflects this process and the appropriate checks undertaking when receiving this waste. **Update EMS to reflect this by the 10th of October.**

3 Microwave treatment plant

Coding for the microwave treatment waste product should be coded as 19 02 10 as detailed in EPR 5.07. NUK had provided NRW with a technical assessment to enable the site to code this waste as 19 12 12. This has been reviewed. It has been agreed that this is more than a mechanical treatment and does include a physio treatment, namely thermal heat sterilisation which renders the original infectious waste harmless to a non infectious waste. 190210 should be used for any waste leaving the site after it has been treated by the microwave process. As already mentioned this is also the code referred to in EPR 5.07 for this waste type (Table A4 Scenario 1). This waste stream is of high calorific value and is sent as RDF/SRF via Derwens recycling at this present time.

From the annual report STAAT Level IV has had one failure so only STAAT Level III is achieved. No waste that requires STAAT Level IV should be processed at the plant until this level is achieved in a 12 month period.

After the site tour we gathered in the meeting room. After initial discussions, CM and RP left the meeting and Emily Jenkins (Operations manager) discussed dual coding issues and overall coding of the waste streams leaving the site.

NRW officers left site at 14:45

NRW received the requested documents on the 4th of September:

- Process flow diagram for the updated Nappi cycle process.
- A selection of Duty of care and consignment notes (37 in total) were also forwarded for a number of waste inputs and waste outputs. These are being reviewed separately.

- Photographs of the mechanical treatment for nursing home non infectious clinical waste.

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.