

Compliance Assessment Report CAR_NRW0048623

Permit being assessed: CB3237AP.

For: Gwynedd Skip And Plant Hire Ltd, **held by:** Gwynedd Skip And Plant Hire Ltd

At: Lon Hen Felin, Cibyn Ind Est, Caernarfon, Gwynedd, LL55 2BD.

Type of assessment: Site Inspection,

Reason: Routine.

On: 19/05/2025 between 11:25 and 13:33.

Parts of permit assessed: As below..

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

Report sent to: Huw Jones, TCM, on 07/10/2025.

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	C2 Significant (Suspended)	1.1.1(a)
W2A - Waste - Operations - Permitted activities	C2 Significant	Table S2.1
W2D - Waste - Operations - The site	Assessed (A)	
W3F - Waste - Emissions and monitoring - Pests	Action only (X)	
W4A - Waste - Information - Records	C4 No impact	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	31.1

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	Submit updated Environmental Management System (EMS)	31/07/2025
W2A	Monitor volume of waste accepted at site to comply with 75,000 tonnes maximum throughput capacity. Submit an	29/08/2025

Criteria	Action needed	Complete by
	action plan to NRW outlining how GSPHL will monitor and prevent waste volume exceedances in 2025. Consider permit variation.	
W3F	Please ensure that waste types which attract seagulls are deposited directly within the mixed waste processing building.	31/07/2025
W4A	Please correct (LoW) List of Waste codes on waste return submissions for mechanically treated wastes.	31/07/2025

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.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Routine site inspection conducted by Natural Resources Wales (NRW) Senior Waste Regulation Officer Leon Williams and Waste Regulation Officer Sarah Walton.

Present on behalf of Gwynedd Skip & Plant Hire Ltd were TCM Huw Jones and consultant Paul Wren.

The weather was dry and sunny during the inspection.

W1A - General Management

Following a NRW inspection in June 2024, GSPHL were set an action to amend procedural document "Interim Sampling Plan, October 2023 Revision 2" to include procedures to certify the correct description of trommel fines in compliance with the Landfill Disposals Tax (Wales) Act of 2017 and Landfill Tax (Qualifying Material) Order 2011 by the 31 October 2024.

A CCS Category 2 score was issued in response to inadequate written procedures regarding the management of trommel fines and compliance with Landfill Tax legislation in GSPHL's Environmental Management System (EMS).

On site, GSPHL informed NRW that consultant Paul Wren was preparing a new EMS for the site.

As GSPHL are actively trying to address this non-compliance we have issued a suspended CCS Category 2 against permit condition 1.1.1(a). Suspended scores do not count towards the company's annual compliance band.

ACTION: Please can you ensure that the new EMS is shared with NRW for review by the 31 July 2025.

Suspended scores can be unsuspended if actions aren't met by the operator.

During the inspection, we observed that a sign had been installed above a bay reading "Qualifying Fines 19 12 12". The operator stated that the fines stored in this bay were produced solely from inert waste and soils which were located in the adjoining bays.

Such wastes can qualify for the lower rate of landfill disposal tax as defined by Landfill Disposals Tax (Wales) Act of 2017 and Landfill Tax (Qualifying Material) Order 2011.



W2A - Permitted Activities

Table S2.1 of permit CB3237AP states that "the maximum quantity of waste to be accepted on site shall not exceed 75,000 tonnes per year".

NRW have undertaken a review of waste returns submitted by GSPHL and the imported tonnages are summarised as follows:

2022 - 76,345 tonnes.
2023 - 92,047 tonnes.
2024 - 98,530 tonnes.

Accepted tonnages at the site have been increasing in breach of the 75,000 tonne limit over the last 3 years.

This is a significant permit breach, with the site having accepted 42,411 tonnes above the limit of their environmental permit.

NRW are concerned that GSPHL are processing quantities of waste above the beyond what is currently permitted, increasing the risk of harm to both the environment and people surrounding the operation.

Environmental permit EPR/CB3237AP has not been subject to risk assessments by NRW to evaluate the site's capacity to manage such quantities of waste against the risks of harm to the environment and human health.

Due to the severity of this non-compliance, NRW issue a CCS Category 2 score against permit condition S2.1.

ACTION: Please submit an action plan to NRW detailing the measures GSPHL will implement to monitor and ensure compliance with waste volume limits, thereby preventing any exceedances in 2025 by the 29 August 2025.

A permit variation application would need to be granted in order to increase the maximum quantity of wastes that can be accepted on site.

Storing and processing excessive quantities of waste can increase the risks associated with fires at waste sites.

A Fire Prevention and Mitigation Plan (FPMP) was prepared on behalf of GSPHL by Oaktree Environmental Limited in 2019. Following review of the FPMP, it appears that waste storage and processing operations have changed since the creation of the document.

Similar to the EMS document, a FPMP should be kept under review and updated as necessary.

During the inspection it appeared that the mixed wastes stockpile located outside the processing building were being stored at heights exceeding 4 metres. The mixed wastes were also stored without a fire wall separating the waste stack and the processing building.

The current FPMP guidance can be found here: cdn.cyfoethnaturiol.cymru/684379/guidance-note-16-fire-prevention-mitigation-plan-english.pdf with page 16 onwards providing guidance on waste stack heights and separation distances.

ACTION: Review and update the Fire Prevention and Mitigation Plan (FPMP) as required by permit condition 3.5.1.

ACTION: Submit an updated version of the FPMP document to NRW for review by the 29 August 2025.

NRW further recommends GSPHL review and update waste storage procedures in the new EMS document as specified in the current "How to comply with your environmental permit" guidance to include:

- "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

- procedures to segregate incompatible wastes for example use of appropriate separation distances and or suitable engineering measures".

Please find a link to the most recent "How to comply with your environmental permit" guidance: [How to comply with your environmental permit](#)

Production of trommel fines from mixed wastes

Mixed municipal and mixed construction and demolition wastes are treated via a trommel, picking line, magnet and blower within the processing building by GSPHL.

Certain residual wastes are segregated, shredded and removed from site as refuse derived fuel (RDF).

Trommel fines were present within the processing building and are produced during the screening of mixed wastes. At the time of this inspection, Huw Jones and Paul Wren stated how these waste fines are brought together with the shredded wastes prior to removal from site.

Waste fines are generally classified under List of Waste (LoW) codes 19 12 11* or 19 12 12 and are considered "mirror entries". A comprehensive waste classification assessment should be undertaken to determine whether the fines meet the criteria for hazardous or non-hazardous waste.

Without sufficient evidence and justification, the non-hazardous waste code cannot be applied.



GSPHL have requested NRW provide guidance regarding the differences between waste

bulking and blending operations.

Environmental permit EPR/CB3237AP limits the treatment of waste to manual and or mechanical sorting, separation, screening, baling, shredding, crushing, compaction and bulking up.

The blending of wastes is not a listed treatment operation in table S1.1 of environmental permit EPR/CB3237AP.

NRW's waste policy team advises that "bulking" is the activity of combining waste of the same type to create a larger mass, while "blending" is combining different types of wastes together.

This means bulking is of waste of the same composition and characteristics, from similar sources and with matching List of Waste (LoW) code and written description. Blending would be mixing of any other wastes.

The current treatment process at GSPHL initially segregates wastes into various streams and relevant to this example - RDF and trommel fines.

Once segregated, separate and distinct waste streams are produced and classified as LoW 19 12 10 (RDF) and 19 12 11* / 19 12 12 (trommel fines).

By bringing these segregated waste streams back together again, NRW believes that such an activity would be considered a blending of waste operation.

The bringing together of two separately defined waste streams could also cause wastes to be mis-described, contrary to Section 34 of the Environmental Protection Act 1990.

A permit variation would need to be applied for and acquired to allow waste blending operations at GSPHL.

W4B - Reporting

The refuse derived fuel (RDF) mentioned above, has been classified on waste returns submitted to NRW as List of Waste (LoW) code 20 03 01 - mixed municipal waste.

NRW does not believe this is an accurate classification of the shredded waste which has been produced via a mechanical treatment process.

A classification under chapter 19 12 would be more appropriate.

Please review this information and correct the classification of this waste type on waste returns submitted by GSPHL.

A CCS Category 4 score has been recorded against permit condition 4.2.2 for this non-compliance.

W2D - The site

GSPHL currently occupy and operate several units across the Cibyn Industrial Estate. Please ensure that all waste transfer, storage and treatment activities remain contained within the boundary as defined by permit condition 2.2.1 and the plan shown in Schedule 7 of environmental permit EPR/CB3237AP.

WF3 - Pests

NRW have previously noted the presence of seagulls at the site and we recognise that new netting has been installed above the mixed waste processing building.

A third-party wagon was seen depositing mixed waste, which appeared to contain food waste, during the inspection. The waste was deposited at the perimeter of the netted area, attracting a large flock of seagulls, this indicated that the netting was ineffective as a bird deterrent.

Huw Jones noted that such waste would ordinarily be deposited within the mixed waste processing building; however, this was not feasible at the time due to the suspension of operations resulting from the inspection conducted by NRW.



The operator is required to ensure that all waste materials are secured and removed from areas of the site that may attract scavengers, within an appropriate timeframe, to prevent potential environmental and public health risks.

ACTION: Please ensure that all wastes which may attract scavengers are deposited directly within the mixed waste processing building as outlined in GSPHL's Pest Management Plan V.1 2024.

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.