

Compliance Assessment Report CAR_NRW0049327

Permit being assessed: ZP3695VH.

For: Refail Newydd, **held by:** Humphreys Waste Recycling Ltd

At: Caergeiliog, Holyhead, Gwynedd, LL65 3DX.

Type of assessment: Site Inspection,

Reason: Routine.

On: 05/09/2025 between 13:00 and 13:30.

Parts of permit assessed: See below.

NRW Lead Officer: Matt Owen, accompanied by Sarah Walton.

Report sent to: Cai Humphreys, Operations manager, on 08/10/2025.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2C - Waste - Operations - Operating techniques	Action only (X)	
W3G - Waste - Emissions and monitoring - Fire	C3 Minor	...
W2D - Waste - Operations - The site	Assessed (A)	

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
W2C	Complete new additional shed area in compliance with building definition on permit.	13/10/2025
W3G	Reduce waste stockpiles to comply with FPMP.	26/09/2025

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.

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 pre-announced inspection of Humphreys Waste Recycling Ltd waste transfer station.

The purpose of the visit was to introduce the new regulating officer for the site, Matthew Owen, who was accompanied by Waste Regulation Officer Sarah Walton.

Present on site representing Humphreys Waste Recycling Ltd were Operations Manager Cai Humphreys and Company Director Kevin Humphreys.

The inspection visit began with a site walk around and a general overview of site operations.

During the visit it was mentioned to Cai Humphreys that NRW had received an incident report regarding the site. This report raised concerns about odour and waste stockpile sizes.

Prior to entering the site, officers walked the site boundary and could not detect any odour either at time of arrival or upon leaving the site.

(W2C) - Operating Techniques.

Permit condition 2.3.1 "The activities shall be operated using the techniques and in the manner described in Table 2.3"

Table 2.3 states "1. Unless stored or treated outside as specified waste a) all bulking, transfer or treatment of non-hazardous waste shall be carried out inside a building"

Shredded mixed waste was being stored in the newly erected waste shed area. Although some more of the shed walls had been constructed, further walls still need completion and doors require fitting.

This shredded mixed waste has the potential to cause odour, particularly in warmer weather.

Cai explained that the new waste shed would be fully completed in approximately 3-4 weeks and this should help prevent any odour pollution leaving site.

"Building" is defined in the permit as "a construction that has the objective of providing

sheltering cover and minimising emissions of noise, particulate matter, odour and litter"

ACTION: Complete building so that any any odour off site is minimised and mixed waste is contained within the structure.

Table 2.3.1 also states:

b) all non-hazardous waste shall be stored in a building or within a secure container.

c) all non-hazardous waste shall be stored and treated on an impermeable surface with sealed drainage system.

Waste on site was clearly segregated from sorted waste fractions. All waste was stored within appropriate bays, on impermeable surfaces and within buildings. No issues were observed by officers with the labelling, identification or classification of waste streams being stored.

(W3G) - Fire.

Permit condition 3.4.1 The operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention plan guidance.

Whilst no odour pollution was detected beyond the site boundary, the waste stockpiles for the mixed shredded waste and waste wood were considered by officers to be above the site FPMP limitations.



Mixed shredded waste (RDF) stockpile stored in new shed building. The cab height of the stationary material handler is 3.1m and the stockpile can be seen to exceed this.



Wood waste stockpile stored in existing building.

These limits are detailed on page No.4 and No.5 respectively within the written Fire Prevention and Mitigation Plan (FPMP) supplied by Humphreys Recycling Ltd.

The Maximum Volume of Each Waste Pile in m3				
Waste Type	Height	Width	Depth	Volume (m3)
General Waste reception bay	2.5m	11.6m	6.7m	213.7m3

Cardboard indoor bay	2.9m	3m	3.4m	32.5m3
Transparent plastic indoor bay	2.9m	3m	3.4m	32.5m3
Paper indoor bay	2.9m	3m	3.4m	32.5m3
Clear HDPE plastic indoor bay	2.9m	3m	3.4m	32.5m3
Aluminium Cans indoor bay	2.9m	3m	3.4m	32.5m3
Food waste indoor bay	2.9m	3m	3.4m	32.5m3
Coloured HDPE indoor bay	2.9m	3m	3.4m	32.5m3
Clear PET bottle indoor bay	2.9m	3m	3.4m	32.5m3
RDF indoor bay	2.4m	11m	5.5m	305m3
Mixed Glass Storage bay	2.4m	5.2m	5.5m	75.5m3
Wood Waste Storage bay	2.4m	5.2m	5.5m	75.5m3
Baled Cardboard storage bay	2.4m	5.2m	5.5m	75.5m3
Baled Paper Storage bay	2.4m	5.2m	5.5m	75.5m3
Baled Transparent plastic fil storage bay	2.4m	5.2m	5.5m	75.5m3

The stockpile heights exceed both 2.4m for wood and 2.4m for RDF.

Site limitations regarding waste stockpile sizes are clearly detailed within the FPMP document above and must be adhered to at all times.

A CCS Category 3 score has been issued for this non-compliance against permit condition 3.4.1.

Action: Ensure waste stack heights are maintained at correct levels as detailed in the FPMP and that any current waste stockpiles on site are managed in line with this.

(W2D)- The Site.

Permit condition 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.

Officers walked the site perimeter and discussed the odour complaint as previously recorded, the site boundary was clearly defined and cross referenced with the site plan contained in permit number EPR/ZP3695VH .

Assessed and no non-compliance found.

S2: storing waste at a secure site.

The area where waste fridges and freezers (16 02 11/16 02 13) are being stored was inspected by officers.

The area was found to be secure and the access key kept in a locked state, requiring a signature to release.

It was generally clean and tidy throughout and correctly separated from other waste streams within a cordoned area.

This area is compliant with the S2: storing waste at a secure site exemption registered with Humphreys Waste Recycling Ltd, exemption reference number NRW-WME103170.



Separate area for waste storage under S2: storing waste at a secure site.

Action: Please continue to store waste correctly under this exemption and ensure waste amounts and storage time does not exceed 400 cubic metres or 6 months respectively as detailed in the conditions of the exemption directive.

Thank you to the staff at Humphreys Waste and Recycling Ltd who assisted officers with the inspection.

Should you wish to discuss or query anything in this CAR form, please get in touch using the details below.

Kind Regards,

Matt Owen.
Swyddog Rheoleiddio Gwastraff /Waste Regulation Officer
Gogledd-Orllewin / North West
Cyfoeth Naturiol Cymru / 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 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.