

Compliance Assessment Report CAR_NRW0049672

Permit being assessed: CB3091ZE.

For: Bryncir Quarry, **held by:** Cambrian Services Limited

At: Bryncir Quarry, Llecheiddior, Uchaf Bryncir, Garndolbenmaen, LL51 9LX.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 24/10/2025.

Parts of permit assessed: As below. .

NRW Lead Officer: Leon Williams.

Report sent to: Graham Gibson , TCM, on 24/10/2025.

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	Action only (X)	

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	To further amend document "Quality Protocol for the production of recycled 6F5 construction material at Bryncir Quarry" as outlined below.	31/12/2025

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

W1A - General management

Permit Condition 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.

On the 18 June 2025, Natural Resources Wales (NRW) received via email a document titled "Quality Protocol for the production of recycled 6F5 construction material at Bryncir Quarry" by Cambrian Services Limited in response to an action documented in NRW Compliance Assessment Report CAR_NRW0048551.

It is understood that this document represents Cambrian Services Limited's version of a Factory Production Control (FPC) document. For the purposes of this report, we refer to it as an FPC.

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.

The guidance document relating to the WRAP Quality Protocol can be found here: [CD1.Y Quality Protocol. Aggregates from inert waste. End of waste criteria for the production of aggregates from inert waste. WRAP October 2013..pdf](#)

Section B2.0 of the document states that a "Factory Production Control (FPC) is required to include the following quality management requirements set out below".

NRW have identified and summarised some procedural gaps in your FPC document under the following headings:

B2.0 Production and standards/specification requirements

- Cambrian Services Limited state that the material produced from treating inert wastes under the WRAP Quality Protocol is classified as "6F5" aggregate. To ensure compliance with the WRAP Quality Protocol and demonstrate that the material has achieved end-of-waste status, the Factory Production Control (FPC) document must verify and confirm that the 6F5 aggregate conforms to the relevant British Standard. This confirmation is essential to validate the suitability of the material for use in construction and to ensure it meets the required quality and performance criteria.

B2.1 General points about the procedures

- A FPC document must be reviewed periodically by management to ensure its continuing suitability and effectiveness. Records of such reviews must be kept but are not currently mentioned in the FPC document.
- Controls on sub-contractors are not currently defined in the FPC document.

B2.2 Waste acceptance criteria

- The FPC document must specify who is responsible for managing waste acceptance procedures.
- Section 4.1.1 of the FPC document outlines how "all material is WAC tested for suitability". Waste Acceptance Criteria (WAC) analysis is used to determine whether a particular type of waste can be accepted at a specific type of landfill. This process is not required under the WRAP Quality Protocol and therefore should be removed from the FPC document.
- The FPC document includes a list of waste codes representing the types of waste that may be accepted at the site under Environmental Permit EPR/CB3091ZE. However, it should be noted that not all of these waste types are permitted as input materials under Annex C of the WRAP Quality Protocol. Therefore, the list of waste inputs in the FPC document requires amendment to ensure alignment with the requirements set out in Annex C.
- Section 4.1.2 of the FPC document outlines how "only clean material from the tip will be used as a feedstock for the production of sand and gravel". NRW do not believe this statement is relevant to the FPC document and should be removed or amended.

B2.3 Production and testing

- The FPC document should be revised to include details on how processing equipment is maintained and adjusted during aggregate production operations.
- The FPC document should be updated to include a procedure for inspecting material taken from stock prior to processing. This should ensure that any signs of deterioration are identified and addressed, maintaining the quality and compliance of the final aggregate product.
- The FPC document should be updated to include procedures for maintaining product quality during handling, storage, transport, and delivery.
- The FPC document should be revised to define procedures for the use, control, calibration, and maintenance of inspection, measuring, and test equipment.

B2.4 Training

- Cambrian Services Limited must ensure that all relevant personnel are adequately trained in the implementation and application of the Factory Production Control (FPC) system. This training should cover the following key areas:
 - **Acceptance criteria** for input materials.

- **Procedures for managing non-compliant** input wastes and output products.
- **Sampling techniques** to ensure representative material testing.
- **Testing protocols** to verify product quality and compliance.
- **Inspection procedures** throughout the production process.

Compliance with the above must be documented in the FPC document.

B2.5 Records

- The FPC must define how records of relevant controls and inspections, calibrations, changes and training must be maintained for a suitable period of time.

B2.6 Documentation

- The Factory Production Control (FPC) document must specify how delivery documentation is to be completed and must include the following information:
 - The type of aggregate dispatched.
 - Confirmation of the site where the aggregate was produced.
 - A declaration confirming the aggregate was produced under a quality management scheme conforming to the aggregates Quality Protocol.

B2.7 Testing & B2.8 Minimum testing requirements – frequencies

- Testing procedures and frequencies for the 6F5 aggregate are defined in Section 5 of the FPC document.

B2.9 Departure from minimum test frequencies

- NRW does not consider this section to be relevant to the current operations at the site.

ACTION: Please review the recommendations outlined above and update the Factory Production Control (FPC) document accordingly. The revised FPC must be submitted to Natural Resources Wales (NRW) for review no later than 31 December 2025.

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.