

Compliance Assessment Report CAR_NRW0048975

Permit number	CB3393ZB	Operator name	GLJ Recycling Limited			
Site name	GLJ Recycling Limited					
Site address	Lower Chapel Bridge Yard, Cwmcarn, Cross Keys, Newport, NP11 7NL					
Assessment type	Incident Response [WIRS 2506433]					
Date of assessment	15 July 2025	Time in	10:00	Time out	13:10	
Parts of permit assessed	See Part 4					
NRW Lead officer	Guy Baskerville	Accompanied by	Neil Griffiths			
Report sent to – Name and position	[REDACTED] Director	Date	20 August 2025			

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
IR3I - Emission and Monitoring - Fire	C3 Minor	3.7.1
IR3B - Emission and Monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.1

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

Total number of non-compliances recorded	Total non-compliance score
2	8

2. What action is required?

Criteria	Action needed	Complete by
IR3I - Emission and Monitoring - Fire	The operator shall operate the activities in accordance with the existing Fire Management Plan. Individual waste stockpile heights/widths/lengths, ELV stack numbers, separation distances between waste stockpiles and separation distances between waste stockpiles and buildings are to adhere to the limits described in the existing Fire Management Plan.	24 September 2025
IR3I - Emission and Monitoring - Fire	The operator shall review and revise its Fire Management Plan. The operator shall submit its revised Fire Management Plan to Natural Resources Wales. The operator shall operate the activity in accordance with the revised Fire Management Plan, from the date of submission, unless otherwise agreed in writing by Natural Resources Wales.	15 October 2025

Action 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 prosecutions 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

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (hereafter *NRW*) findings following an investigation undertaken on 15 July 2025 into the circumstances surrounding the fire that occurred at the installation on 12 July 2025.

Attendees:

Natural Resources Wales

Guy Baskerville [Lead Specialist, Industry Regulation]
Neil Griffiths [Senior Officer, Industry Regulation]

GLJ Recycling Limited

[REDACTED] [Director]

Caerphilly County Borough Council

Abbie Brown [District Environmental Health Officer]
Ceri Davis [District Environmental Health Officer]

Regulatory Context

On Saturday 12 July 2025, Natural Resources Wales' presence was requested by South Wales Fire and Rescue Service (hereafter *FRS*), to provide advice on measures to prevent or mitigate pollution, as a result of a fire at GLJ Recycling Limited, Cwmcarn. The fire took place in the mixed household, commercial and industrial waste storage bays and involved an estimated 250 tonnes of waste. The fire is believed to have been the result of the accidental introduction of a small, battery powered waste electrical device (e.g. an electronic cigarette) into a mobile shredder (N.B. not the primary scrap shredder or pre-shredder), which created an ignition source, which was then discharged via a conveyor belt into the dry, shredded waste mass. The waste storage bays are constructed from pre-cast concrete walls with a steel-framed plastic canopy. The fire was largely contained within the waste storage bays, spreading to and critically damaging the mobile shredder and partially igniting a nearby pre-processed waste scrap stockpile. Firefighting measures involved the use of mechanical craned grabs to transfer burning waste into an improvised quarantine area and dousing with water.

The lead regulatory officer undertook an investigation into the circumstances surrounding the fire on 15 July 2025, alongside District Environmental Health Officers from Caerphilly County Borough Council.

Fire Prevention and Mitigation

N.B. Environmental permit condition 3.7.1 and *Guidance Note 16: Fire Prevention & Mitigation Plan Guidance – Waste Management (version 2)* use the terms 'written fire prevention plan' and 'fire prevention and mitigation plan' to describe a document which details measures to prevent and mitigate against fires. Additionally, the operator has used the term 'Fire Management Plan' to describe this document, insofar as it relates to their activities. This CAR uses these terms interchangeably according to the reference source and context, but should be taken to mean the same document.

Condition 3.7.1 of the environmental permit states:

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

Condition 2.3.1(a) of the environmental permit states:

The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by Natural Resources Wales.

Table S1.2 of the environmental permit is partially reproduced below.

Table S1.2 Operating Techniques		
Description	Parts	Date Received
Fire Management Plan revision 2	All parts	28/05/2021

A Fire Management Plan (hereafter *FMP*) was submitted to Natural Resources Wales on 28 May 2021 to support an application for a new bespoke environmental permit. The FMP was reviewed by the NRW permitting officer during the determination of the permit application. The FRS were consulted on all aspects of the FMP during the permit application determination process.

It is understood that the operator has provided the FRS with digital copies of its FMP (or equivalent document) previously.

NRW officers responding to the fire reported numerous incidences of the operator operating and managing its activities other than in accordance with their FMP, as it relates to both fire prevention and fire mitigation.

Responding NRW officers observed waste stockpile heights greater than the limits described in the FMP. Stockpile heights were also observed to be greater than the limits described in the FMP during the investigation undertaken on 15 July 2025 (see photo 1).

Responding NRW officers observed separation distances between stockpiles of waste to be less than those described in the FMP. Separation distances between stockpiles of waste were also observed to be less than those described in the FMP during the investigation undertaken on 15 July 2025 (see photo 2).

Responding NRW officers observed separation distances between stockpiles of waste and buildings to be less than those described in the FMP. Separation distances between stockpiles of waste and buildings were also observed to be less than those described in the FMP during the investigation undertaken on 15 July 2025 (see photo 3).

Responding officers observed ELVs stacked in numbers greater than as described in the FMP (see photo 4). ELVs stacked in numbers greater than as described in the FMP were also observed during the investigation undertaken on 15 July 2025.

Responding NRW officers observed a failure to implement firewater containment measures described in the FMP, in particular; by blocking the closed surface water drainage system which discharges to 2 above ground storage tanks via an interceptor. The total volume of the tanks and interceptor (not including the void within underground pipework) is reportedly 85,000 litres and it is understood that there exists provision to connect FRS hoses to the tanks to assist firefighting efforts.

In addition, the FMP describes a further 585,000 litres of firewater containment potential via erection of a flood gate/barrier at the main site entrance. The flood gate/barrier was not erected, reportedly at the instruction of the FRS, as it would obstruct site access/egress.

Responding NRW officers observed a failure to make use of the quarantine area described in the FMP. An improvised quarantine area was set up in the vicinity of the fire. Responding NRW officers indicated that the size and location of the improvised quarantine area obstructed the firefighting efforts of the FRS.

Failure to operate and manage the activities in accordance with the FMP represents non-compliance with environmental permit condition 3.7.1.

As a result of this non-compliance a CCS Score [C3] has been recorded against compliance sub-criteria IR3I - Fire

A C3 score has been levied as it is reasonably foreseeable that non-compliance with permit condition 3.7.1 may result in a minor impact on the environment and/or people.

Action 1: The operator shall operate the activities in accordance with the existing Fire Management Plan. Individual waste stockpile heights/widths/lengths, ELV stack numbers, separation distances between waste stockpiles and separation distances between waste stockpiles and buildings are to adhere to the limits described in the existing Fire Management Plan.





Firewater Management and Containment/Smoke

Condition 3.2.1 of the environmental permit states:

Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

Firewater was contained using water filled FRS poly booms and re-used to extinguish the fire where possible, but firewater was observed escaping the boundary of the permitted area by responding NRW officers. Emissions of firewater have the potential to cause pollution to land and/or water.

Smoke from the fire caused a transient visual amenity impact and likely resulted in the unquantified release of substances which have the potential to cause pollution.

As a result of this non-compliance a CCS Score [C3] has been recorded against compliance sub-criteria IR3B - Emissions of substances not controlled by emission limits

A C3 score has been levied as it is reasonably foreseeable that non-compliance with permit condition 3.2.1 will result in a minor impact on the environment and/or people.

Fire Management Plan Review

The fire incident has demonstrated that elements of the existing FMP are logistically impractical and/or not fit for purpose.

[Guidance Note 16: Fire Prevention & Mitigation Plan Guidance – Waste Management \(version 2\)](#) states that it is essential that a FPMP (and overall fire management measures) should be reviewed and improved as required to address any issues/concerns identified following a fire incident.

Any review should include, but not be limited to, consideration of the below issues identified by NRW as a result of the fire incident.

- Managing waste volumes stored onsite.
- Managing waste stockpile heights/lengths/widths.
- Managing waste stockpile separation distances.
- Managing ELV stack numbers/heights.
- Firefighting water supply.
- Containment of firewater.
- Designated quarantine area.
- Waste pre-acceptance and acceptance.
- Staff training.

Action 2: The operator shall review and revise its Fire Management Plan. The operator shall submit its revised Fire Management Plan to Natural Resources Wales. The operator shall operate the activity in accordance with the revised Fire Management Plan, from the date of submission, unless otherwise agreed in writing by Natural Resources Wales.

[END]

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 in the aspects assessed.
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

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 Industry compliance criteria (used in section 1 and 2):

1 - Management

- IR1A - General management
- IR1B - Finance (only applicable to Landfill)

- IR1C - Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2 - Operations

- IR2A - Permitted activities
- IR2B - The site
- IR2C - Operating techniques
- IR2D - Technical requirements
- IR2E - Improvement programme
- IR2F - Pre-operational conditions
- IR2G - Landfill engineering (only applicable to Landfill)
- IR2H - Waste acceptance (only applicable to landfill)
- IR2I - Leachate levels (only applicable to Landfill)
- IR2J - Closure and aftercare (only applicable to Landfill)
- IR2K - Landfill gas management (only applicable to Landfill)

3 - Emission and Monitoring

- IR3A - Emissions to water, air or land
- IR3B - Emissions of substances not controlled by emission limits
- IR3C - Odour
- IR3D - Noise and vibration
- IR3E - Monitoring
- IR3F - Pests
- IR3G - Air quality management plans
- IR3H - Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I - Fire

4 - Information

- IR4A - Records
- IR4B - Reporting
- IR4C - 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 – 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.