

## Compliance Assessment Report CAR\_NRW0049624

|                                           |                                                                  |                       |                       |                 |       |
|-------------------------------------------|------------------------------------------------------------------|-----------------------|-----------------------|-----------------|-------|
| <b>Permit number</b>                      | CB3393ZB                                                         | <b>Operator name</b>  | GLJ Recycling Limited |                 |       |
| <b>Site name</b>                          | GLJ Recycling Limited                                            |                       |                       |                 |       |
| <b>Site address</b>                       | Lower Chapel Bridge Yard, Cwmcarn, Cross Keys, Newport, NP11 7NL |                       |                       |                 |       |
| <b>Assessment type</b>                    | Inspection                                                       |                       |                       |                 |       |
| <b>Date of assessment</b>                 | 24 September 2025                                                | <b>Time in</b>        | 10:30                 | <b>Time out</b> | 12:30 |
| <b>Parts of permit assessed</b>           | See Part 4                                                       |                       |                       |                 |       |
| <b>NRW Lead officer</b>                   | Guy Baskerville                                                  | <b>Accompanied by</b> | Alexandra Tennant     |                 |       |
| <b>Report sent to – Name and position</b> | [REDACTED]<br>Director                                           | <b>Date</b>           | 09 October 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            |

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

| Total number of non-compliances recorded | Total non-compliance score |
|------------------------------------------|----------------------------|
| 1                                        | 4                          |

### 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. | 29 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' findings following an assessment of compliance with Action 1 of CAR ref. CAR\_NRW0048975 issued on 20 August 2025.

##### Attendees:

##### Natural Resources Wales

Guy Baskerville [Lead Specialist, Industry Regulation]  
Alexandra Tennant [Senior Officer, Industry Regulation]

##### GLJ Recycling Limited

[REDACTED] [Commercial Manager]  
[REDACTED] [Environmental Consultant]

#### Regulatory Context

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 occurred at the installation on Saturday 12 July 2025.

Natural Resources Wales (hereafter *NRW*) officers responding to the fire reported numerous incidences of the operator operating and managing its activities other than in accordance with their Fire Management Plan (hereafter *FMP*), as it relates to both fire prevention and fire mitigation. Additionally, the lead regulatory officer also observed numerous incidences of the operator operating and managing its activities other than in accordance with their FMP during the investigation into the circumstances surrounding the fire, undertaken on 15 July 2025. The observed departures from the FMP and the resultant non-compliance are detailed in CAR ref. CAR\_NRW0048975 issued on 20 August 2025.

As a result of the non-compliance with condition 3.7.1, the below corrective action was set, with a completion date of 24 September 2025.

*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.*

Section 3.7 'Piles and separation distances' of the existing FMP states:

*Throughput will be managed to keep pile sizes below the recommended sizes. Separation distances will be applied; these are summarised in **10** (emphasis added).*

It is unclear which visual element(s) are being referenced by '10' in section 3.7 of the FMP. Figure 10 and table 10 of the FMP consider signage and self-combustible wastes, respectively. Section 3.7. of the FMP introduces Table 12 'Maximum pile sizes and minimum separation distances'. NRW shall regard Table 12 as the visual element being referenced by '10' in section 3.7 of the FMP.

Table 12 of the FMP is reproduced below.

| Waste Description         | Max Pile Size  | Min Separation | Notes                             |
|---------------------------|----------------|----------------|-----------------------------------|
| ELV Undepolluted          | 3H x 2D x 1W   | 6 m            | Average car width 4.4 m (Table 2) |
| Metallic Packaging        | 5W x 5L x 4H   | 6 m            | Table 1, Off graph ∴ 6 m          |
| Clean Fe Scrap Metal      | 20W x 20L x 4H | 10 m           | Table 1, Off graph ∴ 6 m          |
| Mixed NF Metal            | 5W x 5L x 4H   | 6 m            | Table 1, Off graph ∴ 6 m          |
| Shredded Fe Metal         | 20W x 20L x 4H | 10 m           | Table 1                           |
| Shredded Mixed NF Metals  | 5W x 5L x 4H   | 6 m            | Table 1, Off graph ∴ 6 m          |
| Fragmentiser Fluff        | 20W x 20L x 4H | 10 m           | Table 1                           |
| WEEE                      | 20W x 20L x 4H | 10 m           | Table 1                           |
| Household,Ind,Comm Wastes | 20W x 20L x 4H | 10 m           | Table 1                           |

Table 7, introduced in section 2.3.4 of the FMP, also addresses maximum waste pile sizes and minimum separation distances. The maximum waste pile sizes and minimum separation distances presented in Table 7 of the FMP tallies with those presented in Table 12 of the FMP.

Table 7 of the FMP is partially reproduced below.

| Waste description                         | EWG Code                         | From                                        | Daily tonnage received  | Total tonnage stored at one time | Max Pile Size                     | Min Separation (M) | Max Storage Time | Storage method                                                                                                          |
|-------------------------------------------|----------------------------------|---------------------------------------------|-------------------------|----------------------------------|-----------------------------------|--------------------|------------------|-------------------------------------------------------------------------------------------------------------------------|
| End-of-life vehicles (undepolluted)       | 16 01 04                         | Whole cars                                  | 5 - 10                  | 10                               | 3 high x 2 rows deep              | 6                  | 30 days          | Impermeable surface<br>Stacked no greater than 3 high                                                                   |
| End-of-life vehicles (depolluted)         | 16 01 06                         | Whole cars with required pollutants removed | 150                     | 20                               | 3 high x 2 rows deep              | 6                  | 30 days          | Impermeable surface or hardstanding<br>Stacked no greater than 3 high or placed on scrap metal heap awaiting processing |
| Metallic packaging                        | 15 01 04                         | Solid                                       | 0.5                     | 2                                | 100m3<br>5 W x 5 L x 4 H          | 6                  | 30 days          | Impermeable surface or hardstanding                                                                                     |
| Clean ferrous scrap metal                 | 17 04 05 and various other codes | Solid                                       | 150                     | 1000                             | 750m3<br>20 W x 20 L x 4 H        | 10                 | 30 days          | Impermeable surface or hardstanding                                                                                     |
| Mixed non-ferrous metals                  | 17 04 07 and various other codes | Solid                                       | 20                      | 100                              | 100m3<br>5 W x 5 L x 4 H          | 6                  | 30 days          | Impermeable surface or hardstanding                                                                                     |
| Shredded ferrous metals                   | 19 10 01                         | Solid, granular waste                       | 250<br>Produced on site | 2500                             | 750m3<br>20 W x 20 L x 4 H        | 10                 | 30 days          | Impermeable surface or hardstanding                                                                                     |
| Shredded, mixed non-ferrous metals        | 19 10 02                         | Solid, granular waste                       | 4<br>Produced on site   | 50                               | 100m3<br>5 W x 5 L x 4 H          | 6                  | 30 days          | Impermeable surface or hardstanding                                                                                     |
| Fragmentiser fluff                        | 19 10 04* (Mirror entry)         | Solid, granular waste                       | 75<br>Produced on site  | 150                              | 450m3,<br>20 W x 20 L x 4 H       | 10                 | 30 days          | Impermeable surface                                                                                                     |
| WEEE                                      | 20 01<br>Multiple*               | Solid                                       | 2                       | 50                               | 450m3,<br>20 W x 20 L x 4 H       | 10                 | 30 days          | Impermeable surface                                                                                                     |
| Household, Industrial & Commercial wastes | 20 01<br>Multiple*               | Mixed                                       | 50                      | 50                               | 450m3, 400m2<br>20 W x 20 L x 4 H | 10                 | 30 days          | In covered bays                                                                                                         |

N.B. Table 12 and Table 7 of the existing FMP do not consider all waste types accepted and generated by the operation and their corresponding stockpile dimensions and locations.

## Assessment Findings

Stockpile heights were estimated using a 5 metre telescopic measuring staff.

General housekeeping and stockpile management was much improved, compared to our observations during the assessment undertaken on 15 July 2025. However, there remains a number of waste stockpiles which exceed maximum stockpile heights and deviate from minimum separation distances described in the FMP.

A stockpile of unprocessed ferrous scrap metal (referred to as *clean production cuttings* by site personnel), located next to the fixed scrap shear, was estimated to be 7+ metres high. The stockpile was within 6 metres of the fixed scrap shear and the ELV processing building. (see photo 1).

A stockpile of unprocessed ferrous scrap metal, located within a concrete walled bay to the north of the weighbridge, was estimated to be 6 metres high. The stockpile was 1-2 metres higher than the total height of the concrete bay walls (see photo 2).

A stockpile of partially processed scrap, awaiting further treatment by the primary shredder and located between the pre-shredder and primary shredder, was estimated to be 5+ metres high. The stockpile was within 6 metres of the pre-shredder and the primary shredder, and physically abutted the concrete base of the stationary scrap handler. (see photo 4 and photo 5).

A stockpile of non-ferrous scrap (cans) physically abutted the concrete base of the stationary scrap handler. (see photo 6).

A stockpile of heavy fraction metal shredder residue (MSR), awaiting further treatment by the heavy fraction treatment plant and located in a storage bay to the south of the heavy fraction plant, was estimated to be 5 metres high (see photo 3).

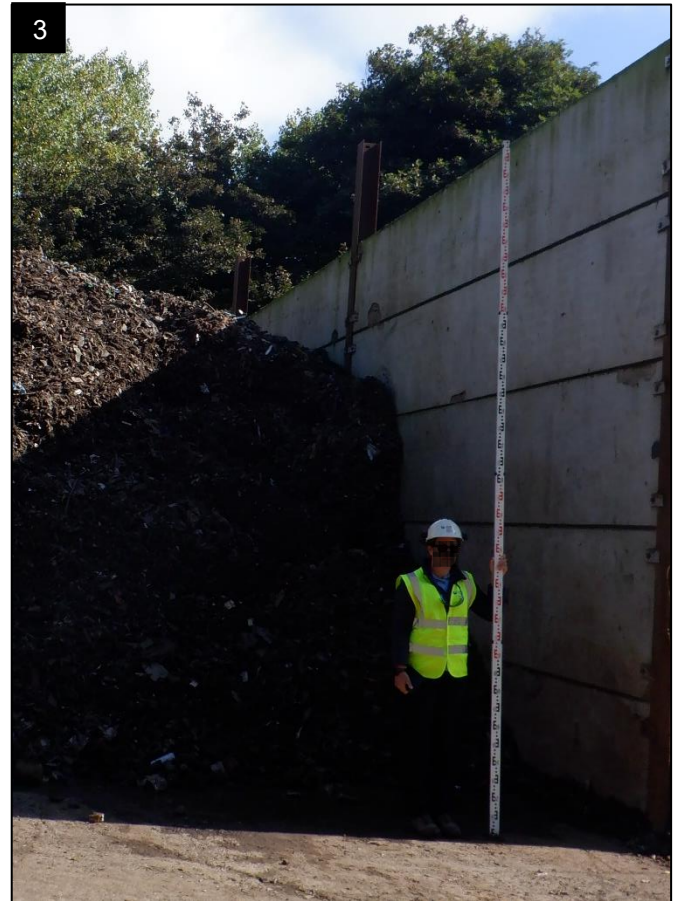
**Failure to operate and manage the activities in accordance with the FMP represents non-compliance with environmental permit condition 3.7.1.**

**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.*







**Fire Management Plan Review**

CAR ref. CAR\_NRW0048975 also set Action 2 (below), which was scheduled for completion by 15 October 2025.

*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.*

However, we have been advised that a revised version of *Guidance Note 16: Fire Prevention and Mitigation Plan Guidance – Waste Management V2* is due to be published in the coming weeks.

To ensure that the revised FMP is developed with consideration of the most up to date guidance, the completion date of Action 2 is extended as per below table.

| Action needed                                                                                                                                                                                                                                                                                                                                  | Complete by                                                                                                                |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| 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. | 8 weeks from the date the operator is notified of the publication of revised Fire Prevention and Mitigation Plan guidance. |

You must operate in accordance with the existing Fire Management Plan until the above action is fully satisfied.

N.B The operator was advised of the extension to the completion date of Action 2 via email on 02 October 2025.

[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](mailto: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](mailto: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.