

Compliance Assessment Report CAR_NRW0050104

Permit number	CB3393ZB	Operator name	GLJ Recycling Limited
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Site name	GLJ Recycling Limited
Site address	Lower Chapel Bridge Yard, Cwmcarn, Cross Keys, Newport, NP11 7NL
Assessment type	Inspection

Date of assessment	10 November 2025	Time in	10:30	Time out	12:05
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Parts of permit assessed	See Part 4
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NRW Lead officer	Guy Baskerville	Accompanied by	Alexandra Tennant
Report sent to – Name and position	[REDACTED] Director	Date	09 December 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	Action Only (X)	3.7.1
IR1A - Management - General management	Action Only (X)	1.1.1(a)

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

Total number of non-compliances recorded	Total non-compliance score
0	0

2. What action is required?

Criteria	Action needed	Complete by
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 January 2026
IR1A - Management - General management	The operator shall provide evidence that the primary shredder is equipped with pressure relief dampers and that they are fully operational.	09 January 2026
IR1A - Management - General management	The operator shall review and revise its Noise and Vibration Management Plan in order to consider all potential noise impacts from site operations. As part of this action, a distinct and separate Noise and Vibration Management Plan from the Amenity Management Plan shall be created.	09 January 2026

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.

4. Details of our assessment

The purpose of this Compliance Assessment Report (CAR) is to record the undertaking of a joint site visit by Natural Resources Wales (hereafter *NRW*) and South Wales Fire and Rescue Service (hereafter *SWFRS*) to address shared concerns in relation to fire prevention and mitigation preparedness.

Attendees:

Natural Resources Wales

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

GLJ Recycling Limited

[REDACTED] [Director]
[REDACTED] [Environmental Consultant]

South Wales Fire and Rescue Service

[REDACTED] [Station Manager]
[REDACTED] [Watch Manager]

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.

The below action was set by Compliance Assessment Report CAR_NRW0048975 to address a number of deficiencies of the existing Fire Prevention and Mitigation Plan (FPMP), identified during the fire event which occurred on 12 July 2025. The original action deadline was 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.

The action deadline was extended to 10 December 2025 to afford the operator the opportunity to consider the revised FPMP guidance, published on 15 October 2025. The operator was advised of the extension via email on 02 October 2025 and 15 October 2025.

Fire prevention and mitigation preparedness at large waste treatment operations remains an ongoing concern of NRW and the Fire and Rescue Services in Wales. NRW invited SWFRS to undertake the joint visit to support the development of the revised FPMP.

SWFRS provided advice and guidance in relation to fire fighting strategy, water supply, managing contaminated firewater and siting of the quarantine area. In addition, discussions were held surrounding managing waste

throughput and capacity in order to maintain stockpile heights and separations distances detailed in the revised FPMP Guidance.

SWFRS have agreed to review and provide feedback to the revised FPMP and Site Water Strategy (should it be prepared separately to the FPMP), upon submission.

SWFRS have further agreed to establishing a site specific Operational Tactical Plan (OTP) to support effective response in the event of any future fires, and to the undertaking of familiarisation visits and training exercises to improve awareness of the site and water systems available to operational crews. NRW will be invited to these visits and exercises where necessary.

When we approve an FPMP, we will agree the scope and suitability of key measures in principle. However, this should not be taken as confirmation that all fire prevention and mitigation measures detailed therein are suitable and sufficient. This remains the responsibility of the operator.

The action deadline has been extended to 15 January 2026, to allow the operator and SWFRS additional time to coordinate in the development of the FPMP and Site Water Strategy.

Other Outstanding Actions

Deflagration Management Plan

The below action was set by Compliance Assessment Report CAR_NRW0048968 to address the observed increase in frequency of deflagration events in summer 2025 and to bring the operation into compliance with relevant Best Available Techniques (BAT) as set out in the European Commission published *Best Available Techniques (BAT) Reference document for the Waste Treatment sector*.

The operator shall submit to Natural Resources Wales for approval within the period specified, a comprehensive and robust deflagration management plan in addendum to the written management system. The plan shall include, as a minimum, the requirements set out in BAT 27a, BAT26a and BAT26b. The operator shall implement the approved deflagration management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

A Deflagration Management Plan (Document ref : *GLJR-EMS-001, Version 2, Addendum*) was submitted to NRW via email on 10 September 2025.

We are satisfied that the submitted Deflagration Management Plan adequately addresses the requirements set out in BAT 27a, BAT26a and BAT26b and sets out measures appropriate to reduce the likelihood of deflagration events.

It is noteworthy that many of the key deflagration prevention measures described in the Deflagration Management Plan rely on human interventions. Site operatives executing the measures described in the Deflagration Management Plan must be appropriately trained in delivering those measures consistently and effectively. There must also be sufficient personnel available to effectively execute those measures. Training and resourcing will be the subject of a future compliance assessment.

Recommendation: The Deflagration Management Plan details an 'Incident Protocol' which includes the submission of an 'Initial Incident Report' to Natural Resources Wales in the event of a deflagration. The Incident Protocol also includes the submission of a final 'Incident Report', which records the outcome of the operator's investigation into the cause(s) of the deflagration and details actions identified to prevent recurrence. It would be prudent to develop templates for each of these reports to ensure that all the necessary information is recorded.

The action is deemed complete.

Best Available Techniques – Pressure Relief Dampers

The below action was set by Compliance Assessment Report CAR_NRW0048968 to identify whether the operation complies with BAT 27(b) as set out in the European Commission published *Best Available Techniques (BAT) Reference document for the Waste Treatment sector*.

The operator shall provide evidence that the primary shredder is equipped with pressure relief dampers and that they are fully operational.

Information in relation to the primary shredder's anti-vibration dampers was submitted to NRW via email on 10 September 2025. The purpose and scope of the action was reiterated to the operator in an email exchange on 21 October 2025.

The action remains outstanding.

Noise and Vibration Management Plan

The below action was set by Compliance Assessment Report CAR_NRW0048968 to prompt the operator to review their Noise and Vibration Management Plan following the recent introduction of a number of operational changes, including additional fixed plant (e.g. the pre-shredder) and waste treatment processes (e.g. the heavy fraction processing plant).

The operator shall review and revise its Noise and Vibration Management Plan in order to consider all potential noise impacts from site operations. As part of this action, a distinct and separate Noise and Vibration Management Plan from the Amenity Management Plan shall be created.

N.B. The action did not require submission of the revised Noise & Vibration Management Plan, only the requirement to review and revise the existing plan.

The below document was submitted to NRW via email on 10 September 2025.

- GLJ Shredder and Shear - Noise and Vibration Management Plan - Rev 0

The submitted Noise & Vibration Management Plan considers noise and vibration impacts from the primary shredder and the mechanical shear only. As per [Noise & Vibration Management Plan Guidance](#), when developing your plan you must identify all plant or operations that could be audible at any known (or proposed) Noise Sensitive Receptors (NSR). Furthermore, the action also specified that the Noise & Vibration Management Plan shall consider all potential noise impacts from site operations.

The action remains outstanding. We remind the operator that if a noise pollution incident is substantiated by Natural Resources Wales and your plan and measures used are not deemed appropriate, non-compliance(s) scores may be levied and we may take legal action against you.

The above feedback to the submitted report was originally provided via email on 20 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 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.
