

Compliance Assessment Report CAR_NRW0049613

Permit being assessed: VP3494FK.

For: Melin Plas Du, **held by:** M O Jones

At: Yffor, Pwllheli, Gwynedd, LL53 6RF.

Type of assessment: Site Inspection,

Reason: Routine.

On: 05/08/2025 between 11:00 and 13:00.

Parts of permit assessed: See below.

NRW Lead Officer: Cheryl Griffiths, accompanied by Sarah Walton.

Report sent to: M O Jones, Permit operator, on 13/11/2025.

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	C3 Minor	1.1.1(a)
W4C - Waste - Information - Notification	C4 No impact	4.2.2
W4C - Waste - Information - Notification	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
2	4.1

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 improve your EMS by including waste storage procedures and send us a copy of this procedure.	02/01/2026
W4C	Ensure to submit your waste returns within one month of the end of each quarter.	31/01/2026
W4C	To notify NRW of any malfunctions, breakdowns or failure of equipment that may cause pollution by completing and submit a schedule 5 within 24 hours of detection.	01/12/2025

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.

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

This was an unannounced visit on Tuesday, the 5th of August 2025 conducted by Natural Resources Wales (NRW) Waste Regulation Officers Cheryl Griffiths and Sarah Walton.

Officers met with Peryf ab Owain who accompanied us during the inspection.

The main purpose of the inspection was to ensure that that the site has carried out the necessary actions stated in the Environmental Protection Act 1990 Section 59ZB(2)(a) Notice which was issued on Thursday, the 5th of June 2025, requesting the removal of waste being stored beyond the permit boundary. During our visit, NRW officers raised their concerns regarding some waste that was still present beyond the permit boundary. On the 8th of August 2025, Peryf sent photographs to NRW to confirm that the waste has since been removed.

This site visit was also carried out to facilitate a handover, following a recent change in personnel. The previous Regulation Officer has recently taken on a new role, and the visit was undertaken to transfer site responsibilities to the newly appointed officer.

At the time of the site visit, weather conditions were dry, and operational activities were observed within the yard.

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A summary of the visit as follows:

Permit conditions assessed

W1A - 1.1. General Management

As stated in permit condition 1.1.1(a) - *The operator shall manage and operate the activities:*

(a) in accordance with a written management system that identifies and minimises 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.

As can be seen in **photograph 1**, non-hazardous waste is stored up high and falling out of the transfer building.



Photograph 1 – Mixed non-hazardous waste

NRW have recently reviewed your Environment Management System (EMS) which was in circulation during the time of our visit and have identified that your waste storage procedures are incomplete. As stated within the *'how to comply with your environmental permit'* guidance:

The waste storage procedure should specify the following;

- How do you ensure that these times are not exceeded.
- How do you ensure that these capacities are not exceeded.
- The maximum size, including the length, width and height.
- Procedures to segregate incompatible wastes for example use of appropriate separation distances and or suitable engineering measures.

Incomplete waste storage procedure within your EMS is the key reason behind this non-compliance.

ACTION: *To develop and implement some key waste storage procedures within your EMS as stated in the ['How to comply with your Environmental Permit'](#) and ['Fire prevention and mitigation plans'](#) guidance.*

You are required to update your Environmental Management System (EMS) to include the above key procedures for all waste types and provide a copy of the updated procedures to NRW by no later than 2nd of January 2026.

It is important to highlight that the current storage practices pose a fire risks for the site and could also increase the presence of pests and vermin.

The absence of fire breaks within the stockpile creates a fire hazard for the yard, and in the event of a fire, there is potential for environmental pollution.

A CCS Category 3 score has been issued in response to this non-compliance against permit condition 1.1.1(a). General Management.

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W4B – 4.2. Reporting

As stated in your permit condition 4.2.2 - Within one month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

Following our visit, NRW officers reviewed your records and it came to our attention that you were late to submit your quarterly waste returns for the second quarter (1 April-30 June) for 2025. NRW received your second quarter waste return on the 27th of October 2025, which is beyond “within one month of the end of each quarter”.

ACTION: **We will take this opportunity to remind you that all waste returns is to be submitted to waste.returns@cyfoethnaturiolcymru.gov.uk within one month of the end of each quarter which is by no later than;**

- ***30th of April***
- ***31st of July***
- ***31st of October***
- ***31st January***

A CCS Category 4 score has been issued in response to this non-compliance against permit condition 4.2.2 Reporting.

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W4C - 4.3 Notifications

As stated in permit condition 4.3.1 (A) - The Environment Agency shall be notified without delay following the detection of:

- a. *any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;*

During our visit, NRW officers observed a large stockpile of wood waste which can be seen in **photograph 2** and **photograph 3** below.

On 4 November 2025, Peryf confirmed via email that the site that was due to receive this wood waste experienced a breakdown, and during this time, the disposal of wood waste was a nationwide issue.

This breakdown was limiting the amount of wood waste that can be removed from your site effectively. Also, the lack of segregation combined with the size of the wood waste stockpile presents a fire hazard and, in the event of a fire, could result into an environmental pollution. NRW also notes that there are currently no fire breaks within the wood waste stockpile, which further increases the risk of fire spreading across the yard. You must ensure that all waste storage activities are carried out in accordance with your environmental permit, environmental management system (EMS) and relevant fire prevention measures.

Please note, you must notify NRW if you ever experience any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution on your site by submitting a schedule 5 without any delays and no longer than 24 hours of detection.



Photograph 2 – Wood (unchipped)



Photograph 3 – Wood (unchipped)

NRW would like to thank you for your co-operation and if you have any further questions about the contents of this inspection report, please do not hesitate to contact us.

Yours faithfully,

Cheryl Griffiths

Waste Regulation Officer

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.

END

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.