

Compliance Assessment Report CAR_NRW0049865

Permit being assessed: CB3491FL.

For: AST Plastic Containers UK LLP, **held by:** AST Plastic Containers UK LLP

At: Unit 1, Abbey Road, Redwither Business Park, Wrexham, Wrexham, LL13 9RF.

Type of assessment: Site Inspection,

Reason: Routine.

On: 04/11/2025 between 10:40 and 11:45.

Parts of permit assessed: 1.1.1.

NRW Lead Officer: Ian Thomas2.

Report sent to: shaun Nichols , operations manager, on 14/11/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W4B - Waste - Information - Reporting	Action only (X)	
W2A - Waste - Operations - Permitted activities	Action only (X)	
W4C - Waste - Information - Notification	C4 No impact	EMS 1.10.2 - If either the TCM or deputy is changed, NRW will be informed of the change and the relevant details of the replacement as soon as possible.
W2D - Waste - Operations - The site	C3 Minor	Permit Table S1.1 – Limits of activities. All hazardous and non-hazardous waste must be stored and treated in a building on an impermeable surface with sealed drainage.
W2D - Waste - Operations - The site	C2 Significant	EMS – 4.1.4. All wastes liable to give rise to contamination will be removed from the site if

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
		the site is not secure or if operations cease or temporarily suspended.

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

Total non-compliances recorded	Total non-compliance score
3	35.1

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
W4B	Please ensure waste returns are submitted in a timely manner	Already completed
W2A	Height of stored materials in Areas 1,2,3, and 4. Not to exceed the stated 2m and 3m relating to the individual areas.	30/11/2025
W4C	Notifications to be sent as soon as possible	Already completed
W2D	All waste materials to be stored inside the warehouse as per the permit conditions	18/12/2025
W2D	Stoppage of further contamination to the watercourse via drainage system. Removal of IBCs to safe location	28/11/2025

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.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

On Thursday the 4th November 2025 Natural Resources Wales officers attended site.

This was a routine site inspection for permit ref EPR/CB3491FL which was carried out by Waste Regulation Officer Ian Thomas.

On arrival at site, Ian met with Shaun Nichols, Operations Manager. Shaun explained that there has been a change in the management structure at the site. The previous site manager and the TCM had both left the company. In place is now Shaun as the Operations Manager, and Poppy Murphy, technically competent manager.

EMS 1.10.2 – If either the TCM or deputy is changed, NRW will be informed of the change and the relevant details of the replacement as soon as possible. Please provide evidence that this was completed, the regulating officer had not been made aware of these changes. **Scored as C4.**

Before carrying out a walk around the site, we discussed the operation and some previous issues, one being the submission of waste returns. At the time of the visit only quarter 1 had been submitted, missing were quarter 2 and 3. Shaun has recently been authorised to sign off the waste returns but was under the impression that waste returns were up to date having received email confirmation. Checks on these details showed that Shaun had received confirmation of receipt for waste relating to packaging and the producer responsibility scheme. Further to this I explained that historically I believe the waste returns have not been completed correctly. The site is receiving plastic waste from outside sources which have not been accounted for. Since the inspection waste returns have been submitted with updated information for the previous year. **Permit condition 4.2.2: Within one month of the end of each quarter, the operator shall submit to Natural Resources Wales 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. This has been recorded as an Action.**



Waste received.

The inside of the warehouse area looks to be in good order. There are works being carried out to improve the facility used to wash out perfume containers. This is not impacting the operation. At the rear of the building and to the side, some waste plastic materials are being stored outside.

Permit Table S1.1 – Limits of activities. All hazardous and non-hazardous waste must be stored and treated in a building on an impermeable surface with sealed drainage. This breach has been scored as a C3. All waste materials must be stored inside the building. Any waste materials stored outside may be at risk of water egress which could cause a minor environmental incident of substances leaking from the containers.



Storage outside.



EMS reference Table 1.1 – Waste Storage. Area 1 max height 3m. Area 2 max height 3m. Area 3 max height 2m. Area 4 max height 2m. These internal storage areas, although not measured, look to be close or in excess of the maximum storage height limit. **Recorded as an Action – please ensure the maximum height for storage is not exceeded.**

Also relating to these storage areas – please make sure the correct materials are stored here – for example, Area 4 – this area has been allocated to **Rejected/untreatable waste**. On the walk through the warehouse it looked to be storing drums for treatment.



Upper left of the photograph shows area 4 storage.

There is substantial works being carried out on the furthest part of the upper car park area, speaking to Shaun about this we established that in the previous week to the visit, reports had been received stating that the watercourse on the industrial estate was a purple/pink colour. NRW officers traced the source as IBCs stored on this area of AST plastics. Shaun explained that this area is planned to be leased to a third party, but as of yet the lease had not been signed, thus the pollution incident was the responsibility of AST Plastics, as they are the landowners. This is outside of the permit boundary of AST Plastics and as such until the agreement is signed for the lease, and a possible permit is applied for and issued to the third party these IBCs should not be stored on the car park. Further to this, the IBCs have the residue of ink or colorants still inside and they are not protected from the elements. When Shaun outlined the plans for this area he also mentioned that AST have CCTV footage which looks as though an ex-employee had purposely poured some of the colourant into the drainage system. I understand this may be a mitigating factor but photographs show that the car park has evidence of the dye spread over a large area and looks to be a result of rain leaking through these containers.

EMS – 4.1.4. All wastes liable to give rise to contamination will be removed from the site if the site is not secure or if operations cease or temporarily suspended.

In this instance NRW must score this breach as a C2.

These spillages have caused contamination to the watercourse located close to the site, the impact of this contamination was due to unknown materials entering the water system, the effect of which could cause ecological damage by changing for example the dissolved oxygen levels. As mentioned there is the possibility of disgruntled ex-staff causing some of the contamination, evidence on the car park shows that the coloured materials have been slowly leaking for some time. NRW had also previously received a report of a blue colour in the watercourse. On the upper car park there is the same blue colorant noticeable on the

ground that looks to be leaching from containers. We discussed the IBCs and Shaun stated that these had been sold to a third party, WTN are available, originally they took them to another site. As the third party are planning to lease some land they transported the IBCs back to site. AST need to provide evidence of the sale of IBCs to the third party company, but as they are still being stored upon AST property, and no lease has been formally signed, the responsibility still remains with the land owner. The unlawful discharge to the watercourse is an offence and NRW are looking into their enforcement options. This could include enforcement notices and will be discussed in due course.





Finally, a check of the EMS for the site has highlighted some errors that, due to the management change will need adjusting, but also some conflicting information.

EMS 1.10 – Fit and proper persons. The TCM is named as Gareth Shepherd. Update required, also on contact list.

EMS 3.5 – Weighing and categorising loads. 3.5.1 – The weight of each load into and out of the site will be weighed using the site's weighbridge to obtain accurate data for the purposes of providing waste returns and tracking the annual throughput of waste. This conflicts with **EMS 2.4 Weighbridge. 2.4.1 – There is no weighbridge at the site but the weight of each load into and out of the site will be estimated using the standard EA/WRAP agreed volume-to-weight conversion factors.**

Thank you for your time during the inspection. Should you have any queries regarding this CAR form please contact.

ian.thomas2@cyfoethnaturiolcymru.gov.uk

Post: Natural Resources Wales, Chester Road, Buckley, Flintshire, CH7 3AJ 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.