

Compliance Assessment Report CAR_NRW0049930

Permit being assessed: EB3697TF.

For: O J Jones & Son, **held by:** O J Jones & Son Limited

At: Porthmadog, Gwynedd, LL49 9SL.

Type of assessment: Site Inspection,

Reason: Routine.

On: 24/09/2025 between 11:00 and 12:15.

Parts of permit assessed: As below. .

NRW Lead Officer: Leon Williams, accompanied by Matt Owen.

Report sent to: Dewi Jones, Company Director , on 21/11/2025.

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	Action only (X)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	Assessed (A)	

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

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

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	Further amend EMS and WRAP Quality Protocol Factory	31/12/2025

Criteria	Action needed	Complete by
	Production Control System as outlined below.	

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.

At this time, we do not intend to take any further action.

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 announced site inspection at O J Jones & Son Limited's waste transfer station located at Ffordd Penamser, Porthmadog, Gwynedd, LL49 9SL by Natural Resources Wales Senior Waste Regulation Officer Leon Williams and Waste Regulation Officer Matt Owen on the 24 September 2025.

Present on site on behalf of O J Jones & Son Limited was Director Dewi Jones and Technically Competent Manager TCM for the site Kevin Connell of Talbot Training Services Ltd.

The weather was dry and sunny during the inspection.

NRW received a complaint during the summer of 2025 alleging the presence of oil contamination at the waste transfer station. No such pollution was identified during this inspection.

W1A - General management

Permit Condition 1.1.1 - The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises the 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.

Actions were set in NRW Compliance Assessment form CAR_NRW0045681 requiring O J Jones & Son Limited to incorporate waste storage procedures in the site Environmental Management System (EMS) as well as a Factory Production Control System for the production of recycled aggregates in accordance with the WRAP Quality Protocol.

Following this inspection on the 7 October 2025, NRW received via email an updated Environmental Management System (EMS) and a Factory Production Control System document.

NRW have reviewed these documents and we wish to provide the following comments:

Environmental Management System (EMS)

Waste storage procedures are defined under section 3.7 of the EMS.

Storage timescales are not currently specified in the EMS. NRW recommends that these timeframes be amended to align with the maximum periods set out in the Waste Framework Directive (WFD) and the Landfill Directive: three years for waste intended for recovery and one year for waste destined for disposal.

In order to identify specific waste stockpiles stored at your facility, NRW also recommends that signage is installed to label waste stockpiles such as:

- Type of material (e.g. "topsoil for recovery" or "concrete waste awaiting crushing").
- Source of waste and intended destination/use.
- Date of arrival and expected removal date (to monitor WFD time limits).

Section 3.7.2 of the EMS sets out procedures regarding the re-use of waste sand. NRW recommends that reference is made here to the WRAP quality protocol and the procedures set out in the Factory Production Control Document if O J Jones & Son Limited wishes to seek end of waste status for waste sand.

Section 3.7.3 of the EMS sets out procedures regarding waste soils. At present there are no end of waste regulations, quality protocols or resource frameworks which enables soils treated at waste transfer stations to meet end of waste status.

The onward recovery or disposal of waste soils stored and transferred from O J Jones & Son Limited's waste transfer station must be made at sites which benefit from either a relevant environmental permit or waste exemption.

All movements of waste soils from O J Jones & Sons Limited's waste transfer station must also comply with the requirements of Section 34 of the Environmental Protection Act 1990. NRW recommends such requirements are implemented into the site EMS.

ACTION: Please update the site Environmental Management System (EMS) to incorporate the recommendations outlined above, specifically regarding storage time limits, procedures for stockpile identification, end-of-waste requirements for waste sand, and Duty of Care obligations for waste soils by the 31 December 2025.

WRAP Quality Protocol Factory Production Control System

The WRAP Quality Protocol is a framework developed to define when waste materials, specifically aggregates produced from inert waste, can be considered fully recovered and no longer classified as waste.

The guidance document relating to the WRAP Quality Protocol can be found here: [CD1.Y Quality Protocol. Aggregates from inert waste. End of waste criteria for the production of aggregates from inert waste. WRAP October 2013..pdf](#)

Section B2.0 of the document states that a “Factory Production Control (FPC) is required to include the following quality management requirements set out below”.

NRW have identified and summarised some procedural gaps in your FPC document under the following headings:

B2.1 General points about the procedures

- Controls on sub-contractors are not defined.

B2.3 Production and testing

- A plan/map would assist in confirming where input materials and finished products are stored. Relevant signage would also assist in identifying stockpiles of finished product.
- Further information is required regarding the use, control, calibration and maintenance of inspection, measuring and test equipment. Equipment must be uniquely identified.

B2.6 Documentation

- The Factory Production Control (FPC) document must be amended to specify how delivery documentation is to be completed and must include the following information:
 - The type of aggregate dispatched.
 - Confirmation of the site where the aggregate was produced.
 - A declaration confirming the aggregate was produced under a quality management scheme conforming to the aggregates Quality Protocol.

B2.7 Testing & B2.8 Minimum testing requirements – frequencies

- Testing and sampling frequencies are listed under Section 6.0 of current FPC. The minimum sampling frequencies for BS EN 13242 recycled aggregate are incorrect as they do not mirror the frequencies listed under table B2 minimum testing frequencies in the WRAP Quality Protocol guidance document as shown below:

End use	Standard and Specifications	Test	BS test reference	Minimum test frequency (see B2.8)
All end uses	BS EN 13242 BS EN 12620	Particle size Distribution	EN 933-1	1 per week
		Particle density	EN 1097-6	1 per month
		Resistance to fragmentation (LA)	EN 1097-2	2 per year
		Classification of constituents(see table B3)	EN 933-11	1 per month
		Water soluble sulfate	EN 1744-1	1 per month

The current FPC, Section 6.0, details the following testing frequencies:

Property	Notes/ References	Test Method	Test Frequency
1 Grading		EN 933-1 (Particle size distribution by sieving)	6 monthly
2 Fines content		EN 933-1 (Particle size distribution by sieving)	6 monthly
3 Resistance to fragmentation	When required by purchaser	EN 1097-2 (Los Angeles method)	On request
4 Resistance to wear	When required by purchaser	EN 1097-1 (Micro-Deval test method)	On request
5 Testing for constituent materials	When required by purchaser	Clause 710 Specifications For Highway Works	On request
6 Water Soluble Sulphate		EN 1744-1 (Nitric acid/Barium Sulphate method)	6 monthly
7 Particle Density		EN 1097-6 (Using the quick method described in Annex E)	6 monthly

ACTION: O J Jones & Son Limited's testing and sampling frequencies under Section 6.0 of the FPC must be amended to comply with the requirements as listed under table B2 minimum testing frequencies in the WRAP Quality Protocol guidance document.

Please review the recommendations outlined above and update the Factory Production Control (FPC) document accordingly. The revised FPC must be submitted to Natural Resources Wales (NRW) for review no later than 31 December 2025.

Compliance with the documented procedures is necessary for O J Jones & Son

Limited to meet the requirements of the WRAP Quality Protocol.

Failure to implement the recommended amendments to the Factory Production Control (FPC) may result in the aggregate being classified as waste. This would subject the material to waste regulatory controls, potentially restricting its use and distribution.

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Permit Condition 1.1.4 The operator shall comply with the requirements of an approved competence scheme.

Kevin Connell is currently undertaking Technically Competent Manager (TCM) responsibilities at the site while overseeing the training programme for site staff to achieve TCM accreditation.

NRW have received copies of Kevin Connell's WAMITAB Level 4 Operator Competence Certificate for Non Hazardous transfer/with or without treatment and a CIWM Continuing Competency Certificate which expires on the 24 October 2026.

Permit condition 1.1.4 is assessed as compliant.

W2A - Permitted activities

Permit Condition 2.1.1 - The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities").

During the inspection, waste operations were limited to storage activities only. Several stockpiles were observed on site, all of which were appropriately sized and managed in accordance with permit conditions.

Notably, a stockpile of waste sand had been seeded with grass to mitigate dust emissions. This proactive measure demonstrates good practice in environmental management, as it reduces airborne particulates and helps maintain site compliance with dust control requirements.

Dewi Jones sought guidance regarding the status of a stockpile of waste soil and stone present on site and whether the stockpile would meet end of waste status as a recycled aggregate. This stockpile appeared to contain a high percentage of soily particulates.



Following receipt of additional information after the inspection, it has been confirmed that the stockpile originated from a local development site and has been classified under List of Waste (LoW) code 17 05 04 as non-hazardous soil and stones.

Natural Resources Wales considers that further treatment and analysis will be required in accordance with the WRAP Quality Protocol to achieve 'end-of-waste' status for use as an aggregate.

If the material is not subjected to further processing, it will remain classified as controlled waste, and all applicable waste management controls will continue to apply to its recovery or disposal off-site

W2D - The site

Permit condition 2.2.1 - The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

All waste activities were contained within the sites permitted boundary.

W3B Emission of substances not controlled by emission limits

Permit condition Table S1.1 activities - Drainage consisting solely of rainfall dependant run-off from: - the hardstanding or impermeable surface via a suitable well maintained interceptor and 3 stage swale to surface water (Outlet 1). - the

hardstanding area, to ground. No visible suspended solids, oil or grease shall be present in the discharge.

Vegetation around the site's discharge point has been cleared to allow for more efficient inspection of the outlet during routine maintenance checks.



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Thank you for your time and assistance during the inspection, and for the work undertaken to update the company's operating procedures in line with current EMS and WRAP Quality Protocol requirements. Further amendments are still needed, but once these are completed, we anticipate both documents will fully meet the required standards.

Diolch yn fawr,

Leon Williams

Uwch Swyddog Rheoleiddio Gwastraff / Senior Waste Regulation Officer
Cyfoeth Naturiol Cymru / Natural Resources Wales

www.cyfoethnaturiol.cymru / www.naturalresources.wales

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.