

## Compliance Assessment Report CAR\_NRW0050048

**Permit being assessed:** CB3495FF.

**For:** Kings Dock, **held by:** South West Wood Products Limited

**At:** Swansea, Swansea, Swansea, SA1 8QT.

**Type of assessment:** Site Inspection,

**Reason:** Other.

**On:** 28/11/2025 between 11:00 and 12:30.

**Parts of permit assessed:** Compliance against Reg 36 - waste storage and FPMP.

**NRW Lead Officer:** David Ellar, accompanied by Alex Underhill.

**Report sent to:** Tom Dunn, Regional Manager, on 04/12/2025.

### 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	Assessed (A)	
W3G - Waste - Emissions and monitoring - Fire	Assessed (A)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2C - Waste - Operations - Operating techniques	Assessed (A)	
W2D - Waste - Operations - The site	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?

No action required.

### 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 visit made by David Ellar and Alex Underhill of Natural Resources Wales (NRW). The purpose of the inspection was to assess compliance against the tier 3 bespoke Environmental Permit (EPR/CB3495FF) and the Environmental Permitting (England and Wales) Regulations 2016 Regulation 36 Enforcement notice which was issued 01/10/2025. NRW officers were accompanied around the site by SWWP Compliance and Projects Manger, Site manager and TCM.

The weather was fine but with strong SW wind. Recent heavy rain had however impacted the site with the site being very wet.

#### **Previous inspection:**

Two permit breaches were identified during the last inspection on the 18/08/2025:

1. Category 2 permit breach of condition 1.1.1 (a) - W1A General Management. This was because either contingency plans noted in the EMS had not been followed or were not sufficient to minimise risks of pollution arising from operations at the Kings Dock site.
2. Category 2 permit breach of condition 3.5.1 – W3G Fire Prevention and Mitigation Plan. This was because waste was not being stored within a manner described under the current approved FPMP (V1.5).

Please see Compliance Assessment Report CAR\_NRW0049182 for further detail.

To ensure the site returned to compliance, an Environmental Permitting (England and Wales) Regulations 2016 Regulation 36 Enforcement notice which was issued on the 01/10/2025 with a deadline for compliance set to 28/11/2025. Steps to be taken were:

1. You must follow the existing contingency plans noted in the EMS and if necessary, amend and improve current EMS to provide contingency procedures that ensure that all wastes are stored appropriately in line with the approved FPMP.
2. You must ensure that the waste is stored within the manner described under the current approved FPMP v1.5 dated: 30 March 2023 (document reference: 2205B/FPMP).

Evidence was seen during this visit that both steps had been complied with in full and the notice was deemed to be complied with.

#### **General Observations:**

Operations were suspended temporarily whilst the inspection took place. Good segregation

of waste types was observed with green waste, untreated waste, unprocessed and processed waste being clearly segregated.

Storage of waste was good and compliant with the current FPMP e.g. maximum of 4m stockpiles and 12m separation gaps between them.

No wood dust was observed leaving the site at time of inspection despite a strong SW wind.

**Permit Breaches:**

No permit breaches were recorded during this inspection.

**General Management (W1A):**

The site is required to be operated in accordance with a written management system (EMS) 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. Within the management system Waste operators must ensure that they have robust and fit for purpose contingency arrangements built into their management systems for supply chain fluctuations, including but not limited to, seasonality and critical plant routine and emergency shutdown etc. These contingency plans have now been updated in a new variation of the EMS (Document Reference: 2205B/EMS/Vary/2022 v1.2 dated 17/11/2025). NRW accept the EMS and contingency variation which was submitted to NRW on the 24/11/2025.

**Fire Prevention and Mitigation Plan (W3G):**

The height of the waste stockpiles were measured to be at a maximum of 4m across the site and separation distances between the stockpiles were observed to be 12m. This is compliant with your current approved FPMP V1.5.

The designated quarantine area was clear and free from waste.

Photographs showing stockpile height and separation distances:

**Emissions and Monitoring (W3B):**

A new updated Dust & Emission Management Plan (Doc Ref: 2205B/DEMP v1.4 dated 18/11/25) was submitted to NRW on the 24/11/2025. This amended version of the DMP now reflects current practices on site and is accepted by NRW.

**Waste Operations (W2A, W2C, W2D & W2E):**

Whilst on site the waste activities during the inspection were found to be in line with the condition 2.1.1 and table S1.1 of the permit. All wastes were stored within the boundary of the permit as required under condition 2.2.1. With no non-compliant wastes identified during the inspection as required under condition 2.3.2.

Many thanks for your time during the inspection.

Ends.

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](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.