

## Compliance Assessment Report CAR\_NRW0050135

**Permit being assessed:** XB3893HN.

**For:** Taybrite Works, **held by:** Browns Waste Management & Recycling

**At:** Hoel Y Bwlch, Bynea, Llanelli, SA14 9ST.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 05/12/2025 between 10:45 and 11:45.

**Parts of permit assessed:** W1, W2.

**NRW Lead Officer:** David Morgan, accompanied by Edward Davies.

**Report sent to:** Mathew Roderick, Director, on 11/12/2025.

### 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	C3 Minor	1.1.1 (a)

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

Total non-compliances recorded	Total non-compliance score
1	4

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	You must operate activities in line with a written management system that identifies and minimises the risk of pollution	06/03/2026

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

A site inspection was undertaken on Friday 5th December 2025. The purpose of the inspection was to review aspects of the permitted activity that were assessed as non-compliant in the previous inspection (17th October 2025).

### **Previous Inspection**

In the previous inspection, on 17th October 2025, permitted activities were assessed as not being compliant with the Environmental Permit. Operations were not being managed in line with an Environment Management System that identified and mitigated the risk of pollution.

On 17th October 2025, very large volumes of waste were being stored on site. The site was at full capacity and there was very little workable space. Some putrescible waste had been on site for a significant period of time, waste was odorous and significant levels of flies were present.

Due to the large volume of waste on site, waste stacks were not clearly defined and there were no firebreaks between materials.

At this time, it was deemed that operations presented a significant risk to the environment should a fire and/or amenity (odour/flies) related incident occur.

Operations were re-assessed on Friday 5th December and the following observations were made:

### **Waste Storage**

Volumes of waste on site remain high, but had been reduced since the previous inspection. Waste was clearly segregated, however, in the main shed the work to install a firebreak in the main stack had not been completed.

You must ensure waste stacks are clearly segregated and firebreaks are installed. It is likely, that in the future, your Environmental Permit will be amended to include the requirement to have a Fire Prevention and Mitigation Plan based on current guidance. You should consider developing a plan that meets this guidance prior to the condition being formally added to your permit. You can find further information regarding Fire Prevention and Mitigation Plans on our website: [Natural Resources Wales / Fire prevention and mitigation plans](#).

Although general volumes of waste had been reduced, some waste appears to have been on site for a considerable amount of time. Natural Resources Wales will be focussing

specifically on waste turnaround times in the next inspection.

### **Amenity**

Prior to the inspection on 5th December 2025, officers undertook odour assessments in the local area. Officers found no signs odour was emanating from site and having a detrimental impact on the local amenity.

Birds (Gulls) were present prior to, and during the inspection, but were not present in levels that were causing a nuisance in the area.

### **Site Infrastructure**

Outside the main storage building, water was ponding in areas close to where waste is being stored and treated. As highlighted in previous inspections, pooling/ponding of water in waste storage areas has the potential to cause odour. You must ensure drainage systems are working effectively.

It is noted, however, that the inspection was carried out during a period of significant heavy rain and at the time, this was not deemed to be contributing to odour on site.

### **Non-compliance**

#### **A non-compliance was recorded (Category 3 - Minor)(Ref: W1A) against Condition 1.1.1 (a) of the Environmental Permit**

Volumes of waste have been reduced, but the site still presents a risk as waste stacks are not clearly segregated and firebreaks have not been fully installed. Some waste appears to have been on site for a prolonged period of time and this risks causing increased levels of odour.

You must ensure that activities are operated in line with a written management system that identifies and mitigates the risk of pollution from permitted activities.

We note that volumes of waste have been reduced on site and there are mitigating factors such as issues with staff turnover, plant & equipment failures added to the fluctuation in commodities in the waste industry.

On this occasion, a Category 3 (Minor) non-compliance was recorded to reflect the reduction in risk of pollution from activities.

### **Next Inspection**

The next inspection, provisionally due to take place on Friday 6th March 2026, will focus

on:

- Fire Prevention and Mitigation
- Waste storage and processing times

### END OF REPORT

***Any compliance criteria not highlighted in the above summary should be considered as not assessed. In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resource Body for Wales (Establishment) Order 2012. You should note that the Natural Resources Body for Wales has been formed by bringing together the Countryside Council for Wales, Forestry Commission Wales and Environment Agency Wales. The Natural Resources Body for Wales has been empowered to exercise Welsh devolved functions since 1st April 2013 and has, generally, taken over the responsibilities of the Countryside Council for Wales, the Forestry Commissioners and the Environment Agency for Wales.***

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.