

Compliance Assessment Report CAR_NRW0050070

Permit being assessed: EP3230BW.

For: Rassau Recycling Facility, **held by:** Envirowales Ltd

At: Envirowales Ltd, Plateaux 1-2 Rassau Industrial Estate, Rassau, Ebbw Vale, Blaenau Gwent, NP23 5SD.

Type of assessment: Site Inspection,

Reason: Routine.

On: 28/11/2025 between 09:00 and 15:00.

Parts of permit assessed: IR1A, IR2B, .

NRW Lead Officer: Wayne Grimstead, accompanied by Alexandra Tennant.

Report sent to: Redacted, Site Director, on 29/12/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Action only (X)	
IR2B - Installations - Operations - The site	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	

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
IR3A(1)	Operator to provide effluent waste treatment site plan.	30/01/2026
IR2B	Operator to send photos of each emission point source and descriptive location on site.	30/01/2026
IR1A	Please provide the relevant sections of your Environmental Management System, which detail how EnviroWales:	30/01/2026

Criteria	Action needed	Complete by
	<ul style="list-style-type: none"> • Keep a register of all statutory responsibilities • Track / input into developments in statutory environmental responsibilities • Manage changes associate with statutory environmental responsibilities e.g appropriate measures. 	

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

Introduction

This Compliance Assessment Report (CAR) has been prepared following an announced inspection of the permitted site, **Envirowales Limited** on 28th October 2025. The inspection was carried out by Wayne Grimstead (WG) and Alexandra Tennant (AT) of Natural Resources Wales.

The primary purpose of the visit was to transfer regulatory responsibility for the site from Luke Burton of Natural Resources Wales to AT and for the incoming regulatory officer to familiarise themselves with the site. Representatives from the Environment Agency attended the meeting as part of their ongoing consultation on technical guidance relating to the storage and treatment of waste batteries at permitted facilities. An inspector from the Health and Safety Executive was also in attendance. The visit began with introductions, followed by a site overview and a guided tour of the facility provided by Envirowales.

Attendees:

Natural Resources Wales

Wayne Grimstead (Team Leader, South East Regulated Industry Team)

Alexandra Tennant (Senior Officer, South East Regulated Industry Team)

Environment Agency

Peter Chesney (Senior Technical Advisor - Hazardous Waste & Metal Recycling)

Tom Nickson (Chemical regulatory development team)

David Wadsworth (Senior Industry Officer)

Health and Safety Executive

Hatti Shipp (HM Inspector of Health and Safety)

Envirowales

(Redacted)

Emissions

3.1 Emissions to water, air or land

3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1, S3.2, S3.3 and S3.4.

3.1.2 The limits given in schedule 3 shall not be exceeded.

Operator to send photos of each emission point source and location on site as this was unable to be clarified during inspection.

Pre-application advice and guidance

NRW has a responsibility to help those we regulate understand what they need to do to comply with the law. Basic advice is available on our website to help operators understand what type of permit is required, how to apply, clarify guidance, sign post best practice and industry standards, and identify environmental sensitivities in the area.

We can provide you with more detailed, additional advice on a discretionary basis.

Where an operator requests more detailed pre-application advice or engages in pre-application discussions with NRW in relation to a proposed application, the charge will be

£125 plus VAT for each hour of pre-application advice given or discussions held.

We can provide advice on operators specific activity and site, to help operators:

- understand if they need any permissions (permits, licences, authorisations etc) from us, for your activity
- prepare a quality application or submission for the permissions needed

We will not provide any advice or service that might 'pre-determine' or prejudice the determination of an application before it is submitted. This means we cannot:

- prepare reports for operators, or
- carry out pre-assessments of information that should form part of the formal application

This must be done as part of the technical determination of the application. We can only determine an application once we are content that all the necessary information has been submitted, and we formally accept the application.

Our pre-application advice service is there to provide advice only.

Submitting an application based on our advice is not a guarantee that a permit, licence, or authorisation will be granted.

We cannot be held responsible for decisions made by other bodies who will have other factors to consider alongside our advice.

General terms and conditions for chargeable services can be found [here](#).

To request to use our discretionary pre-application advice service use the link [here](#).

Please include a detailed summary that explains the activities you want to do and what areas you want advice on. Use non-technical language and avoid technical terms as much as possible. It must provide enough detail for us to understand your proposal and assess if we can provide advice.

Permitting Service delays

Natural Resources Wales Installations Permitting Team are currently managing a backlog of permit applications following an organisation-wide recruitment freeze. The freeze has resulted in applications not being allocated to a Permitting Officer for between 6-9 months after being received. We apologise in advance for the delay this will cause.

Actions

Action 1: Operator to provide effluent waste treatment site plan

Action 2: Operator to send photos of each emission point source and descriptive location on site.

Action 3:

Please provide the relevant sections of your Environmental Management System, which detail how EnviroWales:

- keep a register of all statutory environmental responsibilities
- track/input into developments in statutory environmental responsibilities
- manage changes associated with statutory environmental responsibilities e.g. appropriate measures

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 Industry compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – 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.