

## Compliance Assessment Report CAR\_NRW0050286

**Permit being assessed:** QP3894FF.

**For:** Penhesgyn Waste Transfer & Materials Recovery Facility, **held by:** Isle Of Anglesey County Council

**At:** Llansadwrn, Ynys Mon, LL59 5RY.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 18/12/2025 between 10:25 and 11:55.

**Parts of permit assessed:** As below. .

**NRW Lead Officer:** Kieran Evans, accompanied by Leon Williams.

**Report sent to:** Bob Parry, TCM, on 29/01/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2A - Waste - Operations - Permitted activities	C3 Minor	1.1.1
W2E - Waste - Operations - Waste acceptance	C3 Minor	1.2.1
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W3D - Waste - Emissions and monitoring - Noise and vibration	Assessed (A)	
W3F - Waste - Emissions and monitoring - Pests	Assessed (A)	
W4A - Waste - Information - Records	C3 Minor	4.4.1, 4.4.3
W4B - Waste - Information - Reporting	C3 Minor	6.2.2

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

Total non-compliances recorded	Total non-compliance score
4	16

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
W2A	There is no provision for mixing/blending of waste in the specified waste management activities (permit condition 1.1.1). This will need to cease, with LoW 20 01 99 and LoW 20 03 01 being stored and treated separately on the site moving forward.	31/07/2026
W2E	Apply for permit variation to allow the acceptance of LoW 20 01 99.	31/07/2026
W4A	Ensure that waste description is checked against the transfer note on acceptance, and ensure that waste is despatched from site under the correct LoW code and description.	31/07/2026
W4B	List waste received and waste removed under the correct LoW code(s) on quarterly waste returns.	31/07/2026

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.**

**At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.**

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

Routine site inspection conducted by Waste Regulation Officer Kieran Evans. I was accompanied by Senior Waste Regulation Officer Leon Williams. Site Technically Competent Manager (TCM) Bob Parry representing Isle of Anglesey County Council accompanied us throughout the visit. Weather conditions during the visit were dry overcast with light drizzle.

On this visit TCM Bob Parry provided us with a full tour of the site along with a demonstration of how the site is currently processing the kerbside offensive hygiene waste. This demonstration consisted of a loading vehicle depositing segregated offensive hygiene waste (tiger bags) list of wastes (LoW) 20 01 99 into the pre-existing mixed municipal waste pile LoW 20 03 01, followed by repeated turning of the overall waste pile in order to achieve a mixing of the waste.

**W2A (Permitted activities):**

**Permit condition 1.1.1 states that: "no waste management operations shall be authorised by this license unless: a) specified in and undertaken in accordance with the limitations in the following table; (Table 1.1)".**

With reference to Table 1.1 in the site permit, there is no provision for mixing/blending of wastes as part of the site operations. Currently offensive hygiene waste is brought to the site under LoW code 20 01 99 and mixed in to mixed municipal waste (LoW code 20 03 01), leaving the site as LoW code 20 03 01.

With reference to the below image, offensive hygiene waste (yellow tiger bags) LoW 20 01 99 can clearly be seen incorporated into mixed general wastes LoW 20 03 01. Moving forward, both LoW 20 01 99 and LoW 20 03 01 will need to be stored and treated separately at the site. This issue arises because the waste streams are collected separately, and mixed at the site contrary to the site's permitted activities. This permit breach will be scored as a C3 - minor non-compliance against permit condition 1.1.1.

**Action: Store and treat LoW 20 01 99 and LoW 20 03 01 separately at the site.**



**W2E (Waste acceptance):**

**Permit condition 1.2.1 states that: "No wastes other than those, which are categories below in Table 1.2A and specified in detail in Appendix A to these conditions shall be accepted at the site".**

With reference to Appendix A of the site permit, LoW code 20 01 99, (offensive hygiene waste) is not a waste type that the site is permitted to accept. See the image below taken from Appendix A of the site permit, which shows all of the relevant LoW 20 01 codes that the site is permitted to accept.

**20 01 separately collected fractions (except 15 01)**

20 01 01	paper and cardboard
20 01 02	glass
20 01 08	biodegradable kitchen and canteen waste
20 01 10	clothes
20 01 11	textiles
20 01 28	paint, inks, adhesives and resins other than those mentioned in 20 01 27
20 01 30	detergents other than those mentioned in 20 01 29
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 01 40	metals
20 01 41	wastes from chimney sweeping

**20 02 garden and park wastes (including cemetery waste)**

As this site is currently accepting LoW 20 01 99 contrary to condition 1.2.1 of it's permit, the site will need to gain a permit variation in order to accept LoW 20 01 99 as a permitted activity moving forward. This permit breach will be scored as a C3 - minor non-compliance against permit condition 1.2.1.

**Action: Apply for a permit variation, to allow LoW 20 01 99 to be accepted at the site.**

**W3C (Odour):**

No issues noted in regard to odour, during the time of our inspection.

**W3D (Noise and vibration):**

No issues noted in regard to noise and odour, during the time of our inspection.

**W3F (Pests):**

No pest issues noted on this site, during the time of our inspection.

**W4A (Records):**

**Permit condition 4.4.1 "Waste acceptance procedures" states that: "All wastes shall be received, inspected, accepted or rejected and recorded in accordance with the standards specified in Table 4.4 below".**

Table 4.4 Standards for waste acceptance and control procedures	
Stage of Waste Handling	Specified standards
a) Waste inspection	All wastes received at the site: i) shall be inspected on receipt to confirm their description and composition against the relevant waste transfer note and other accompanying documentation. ii) shall be kept separate from and shall not be mixed with other wastes until they have been confirmed and recorded for acceptance at the site.
b) Waste control procedures: quarantine storage and rejection of wastes	i) Any items of non-permitted waste which are detected after acceptance at the site, shall be placed immediately in a designated quarantine container, and, where these are or appear to be special wastes, the Agency shall be informed immediately; ii) In the quarantine area, wastes shall be kept segregated from other wastes which are or are likely to be incompatible; iii) Quarantined wastes shall be removed from site within 7 days; iv) The maximum quantity of wastes kept in the quarantine storage area shall be 4.6m <sup>3</sup> at any one time. v) A record shall be kept in the site diary of all rejected wastes and all wastes kept in quarantine storage.
c) Identification of wastes	Bays and containers shall be clearly defined and labelled to identify the wastes stored within them
d) Waste despatch procedures	All wastes despatched from the site shall be inspected prior to despatch to confirm their description and composition.
e) Incompatible wastes	Incompatible wastes that are likely, in combination with each other or with other material at the facility, to give rise to pollution of the environment or harm to human health outside the site, shall be clearly identified and kept physically separate in designated areas.

With reference to site permit Table 4.4. a) waste inspection: **"All wastes received at the site: i) shall be inspected on receipt to confirm their description and composition against the relevant waste transfer note and other accompanying documentation. ii) Shall be kept separate from and shall not be mixed with other wastes until they have been confirmed and recorded for acceptance at the site"**. We have reviewed the waste transfer notes of the third party waste collector which deposits LoW 20 01 99 at Penhesgyn Waste Transfer and Materials Recovery Facility. On the site waste returns dated 14/10/2025, LoW 20 01 99 was not listed as waste received, with "kerbside general waste" being listed as LoW 20 03 01. LoW 20 01 99, is the correct code for the kerbside offensive hygiene waste. With reference to **"Appendix A Permitted Wastes"**, LoW 20 01 99 is not a waste code the site is permitted to accept. The required inspection of the description and composition of the waste against it's waste transfer note should have confirmed that this waste type is incompatible for acceptance at the site.

Please ensure that waste received at the site is checked against relevant transfer notes and cross referenced with **"Appendix A Permitted Wastes"** before wastes are accepted, ensuring consistency in classification throughout.

**Permit condition 4.4.3 "Waste despatch procedures"** states that: **"All outgoing wastes shall be inspected, despatched and recorded in accordance with the standards specified in Table 4.4 below"**. With reference to Table 4.4 d) waste despatch procedures, it is stated that: **"All wastes despatched from the site shall be inspected prior to despatch to confirm their description and composition"**. Currently, LoW 20 01 99 is being mixed into LoW 20 03 01, leaving the site under the description of LoW 20 03 01. This is a misclassification of the waste despatched from site. Therefore moving forward, these waste streams must be both despatched and reported separately on waste returns. These permit breaches are to be scored as a C3 minor non-compliance against consolidated permit conditions 4.4.1 and 4.4.3.

**Action: Ensure that waste description is checked against the transfer note on acceptance, and ensure that waste is despatched from the site under the correct LoW code and description.**

**W4B (Reporting):**

**Permit condition 6.2.2 requires "A summary record of the waste types and quantities accepted and removed from the site", to be submitted for each quarter of the financial year.**

As previously mentioned, on the site waste returns submitted to us on 14/10/2025, kerbside offensive hygiene waste collections are listed as LoW 20 03 01 (mixed general wastes), being listed as such on the "waste received" section. The correct LoW code for kerbside offensive hygiene waste collections is LoW 20 01 99. Moving forward please list kerbside offensive hygiene waste collections as LoW 20 01 99 on the "waste received" section of your quarterly waste returns.

Furthermore under the "wastes removed" section of the submitted waste returns, due to the practice of mixing offensive hygiene waste (LoW 20 01 99) with mixed general waste (LoW 20 03 01), waste despatched from the site is also misclassified. This practice distorts the accurate volumes of both LoW 20 01 99 and LoW 20 03 01 reportedly leaving site on the waste returns, as the total of both of these waste types leave under the LoW code of 20 03 01. Moving forward LoW 20 01 99 and 20 03 01 must be both despatched and reported separately on waste returns. This permit breach is to be scored as C3 minor non-compliance against permit condition 6.2.2.

**Action: List waste received and waste removed under the correct LoW code(s) on quarterly waste returns.**

To conclude, by applying the actions outlined above, the site will adequately address the areas of the permit where non compliance has been identified. In order to continue to receive LoW 20 01 99, the site will need to apply for a permit variation to accept LoW 20 01 99 as permitted waste stream.

Thank you for your time and co-operation with the visit.

Kind regards

Kieran Evans

**Waste Regulation Officer NW**

*"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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- W3A(2) – Emissions to air
- W3A(3) – Emissions to 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.

**Disputing the Content of this Compliance Assessment Report Form**

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

**Concerns Not Related to the Content of this Compliance Assessment Report Form**

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk)

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** [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.