

Compliance Assessment Report CAR_NRW0050860

Permit being assessed: PP3993VS.

For: Atlantic Recycling Limited, **held by:** Atlantic Recycling Limited

At: Rumney, Cardiff, Glamorgan, CF3 2EJ.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2025.

Parts of permit assessed: Annual Returns.

NRW Lead Officer: Lewis Evans.

Report sent to: Director, Director, on 26/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2A - Installations - Operations - Permitted activities	C3 Minor	2.3.3
IR2A - Installations - Operations - Permitted activities	C3 Minor	2.3.3

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

Total non-compliances recorded	Total non-compliance score
2	8

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
IR2A	Action: Please provide a root cause of the acceptance of non-complaint wastes and what measures you will have in place to prevent this in the future by the 30th of April 2026	30/04/2026
IR2A	Action: Please provide a root cause of the management of waste tonnages on site and why the site has accepted more waste than it is permitted to by the 30th of April 2026.	30/04/2026

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

Atlantic Recycling Limited

Permit Reference EPR-PP3993VS

Annual Returns

Permit condition 4.2.2: For the following activities referenced in schedule 1, table S1.1 (A1 and A2), a report or reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales by 31 January (or other date agreed in writing by Natural Resources Wales) each year. The report(s) shall include as a minimum:

(a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;

(b) the annual production /treatment data set out in schedule 4 table S4.2; and

The operator submitted their annual returns within the specified period set out in their environmental permit.

Performance 1

The operator submitted the performance1 form which reports the annual quantity of SRF/RDF treated/produced on site. This figure was 345.2tonnes. Additionally, the operator made comments that the 345.2 tonnes is of the total quality of SRF produced and that has left site during 2025, no RDF waste has left site.

The operator has not began the water treatment activities to date and there are no results to show. Please see action 12 below on further comments on this.

Waste Returns

NRW had received Atlantic's waste returns on time for each quarter. Atlantic received 227,438.06 tonnes of waste in 2025 and removed 224,188.38 tonnes.

Permit condition 2.3.3 states:

2.3.3 Waste shall only be accepted if:

(a) it is of a type and quantity listed in schedule 2 tables S2.2, S2.3, S2.4, S2.5 and S2.6.

(b) it conforms to the description in the documentation supplied by the producer and holder.

In quarters 1 and 2 Atlantic have reported to having accepted the following waste codes on their returns:

17 03 01 and
20 01 36

These two waste codes are not permitted in Schedule 2 of the permit and as a result a breach of the permit condition has occurred. As a result of this a Category 3 non-compliance will be scored against this permit condition.

Action: Please provide a root cause of the acceptance of non-complaint wastes and what measures you will have in place to prevent this in the future by the 30th of April 2026.

Additionally, when reviewing the waste received on site against the limits set out in Schedule 2 of the permit, the site has accepted waste above these limits.

A total of 135,217.97 tonnes of 19 12 10 and 19 12 12 was accepted onto site in 2025. This type of waste is listed under table S2.2 and S2.3, which each have a limit of 100,000 and 112,000 respectively. If we assume that 100k of the 135,217.97 tonnes of waste falls within table S2.2, there remains 35,217.97 tonnes of waste which can fall under table S2.3. However, when calculating the remainder of the waste accepted on site which can only fall under table S2.3 (82,504.75tonnes) it equals 117,722.72 tonnes of waste, which is above the 112,000 tonnes limit. As a result of this, a Category 3 non-compliance will be scored against permit condition.

Action: Please provide a root cause of the management of waste tonnages on site and why the site has accepted more waste than it is permitted to by the 30th April 2026.

Actions from Previous CAR's

CAR NRW0049283

Action 1: Please include the samplers records to be auditable for future visits/audits. This can include a summary of the sample i.e. date, time, observations. by the 25th September 2025.

The operator responded via email on the 25th of September 2025 confirming the site has amended the spreadsheet to include samples records and will be available for future visits. **Complete.**

CAR NRW0048716

Action 1: Please can you state where the two wastes were kept when they came on site by the 11th of August.- Complete

Action 2: Please explain why your pre-acceptance procedures did not identify the unpermitted waste streams prior to arriving on site? Please explain how you have complied

with your procedures for non-conforming loads.

An internal error by the weighbridge operator. Please ensure regular training and checks are made to ensure no errors are made in the future. – **Complete**

Action 3: Please advise if these wastes are on site by the 11th of August.

Operator has confirmed that waste has been removed from site. **Complete**.

Action 4: Can you confirm at what point the 19 12 09 waste is generated in the process by the 11th of August.

Operator has provided comments on this, further inspection is required here. **Ongoing**.

Action 5: Please confirm if the 19 12 09 waste arising from ARL contains any anthropogenic waste or non-mineral waste, as described above by the 11th of August.

Operator has provided comments on this, further inspection is required here. **Ongoing**.

CAR_NRW0046315

Please complete Actions 1 - 6 by the 27th of March 2025. – **Complete**

Action 8 – Submit a waste sampling plan to include all applicable wastes (Mirror and Absolute entries) to NRW by the 27th of March 2025. - **Complete**

Action 9: Hold and use the accepted sampling plan that will be submitted to NRW for all wastes leaving site. - **Complete**

Action 10: Please submit to NRW details of where this fluff waste will be deposited by the 27th of March 2025. – **Complete**

Action 11: Bring stockpile heights down to 4m levels as referred to in the FPMP guidance. Please submit to NRW a waste reduction plan on how you will reduce waste on site and manage the waste as well as a updated FPMP to align with the NRW/WISH Guidance by the 27th of March 2025.

The operator has come back with comments on the FPMP, this is an **ongoing** action.

Action 12: Please carry out regular testing on the 'settlement ditch' to ensure no effluent from the site has leached out via the discharge point. – **Ongoing**

The operator has confirmed that they will undertake regular testing of the settlement ditch to check for contamination. Are you able to provide results of testing done on the settlement ditch?

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 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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

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

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

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.