

## Compliance Assessment Report CAR\_NRW0050625

**Permit being assessed:** DB3595HV.

**For:** Minffordd Quarry and Asphalt Plant, **held by:** Breedon Trading Limited

**At:** Minffordd Quarry, Minffordd, Penrhyndeudraeth, Gwynedd, LL48 6HP.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 06/02/2026.

**Parts of permit assessed:** First Inspection Checklist.

**NRW Lead Officer:** Kieran Evans.

**Report sent to:** John Evans, Quarry Manager, on 02/03/2026.

### 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)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W2G - Waste - Operations - Improvement programme	Action only (X)	
W3G - Waste - Emissions and monitoring - Fire	Assessed (A)	
W4B - Waste - Information - Reporting	Assessed (A)	
W4C - Waste - Information - Notification	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?

Criteria	Action needed	Complete by
W2G	Notify NRW when the site is to become operational and outline a date by which NRW can expect to receive the results of a BS 4142:2014+A1:2029 noise impact assessment as outlined in Table S1.3 of the site permit.	31/12/2026

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.

### **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 a pre-arranged first inspection checklist, for Breedon Trading Limited: Minfordd Quarry and Asphalt Plant, Minfordd, Penrhyndeudraeth, LL48 6HP (hereby referred to as "the site"), conducted via a Teams call.

Representing Natural Resources Wales (NRW) was Waste Regulation Officer Kieran Evans. Representing WB Environmental was: Acting TCM on behalf of Breedon Trading Limited, Paul Anthony Williams. Quarry Manager John Evans, and Assistant Quarry Manager Neil Williams represented Breedon Trading Limited. The site is not currently operational, but is aiming to become operational by the end of 2026.

### **W1A - General Management:**

**Permit Condition 1.1.1 (a) states: "The operator shall manage and operate the activity: in accordance with a written management system 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".**

NRW have received a copy of the site Environmental Management System (EMS).

Section 9.1 of the site EMS outlines that the EMS will be reviewed on an annual basis.

Section 9.2 of the site EMS also outlines that the site EMS will additionally be reviewed if any of the following occur:

- If changes are made to the site, operations or equipment are made that affect the activities in the permit.
- A permit variation occurs.
- Following an accident, or complaint of breach of permit.

- If a new environmental issue arises or in response to climate change, and new control measures are implemented.

**Permit Condition 1.1.4 states: "The operator shall comply with the requirements of an approved competence scheme."**

During the meeting, it was established that Quarry Manager John Evans is currently undertaking and completing technical competence to be the site Technically Competent Manager (TCM). Due to this, Paul Anthony Williams is acting as the site TCM until John Evans is suitably qualified. NRW note that Paul Anthony Williams has achieved and updated his continuing competence on the 20/02/2026 (certificate number 5299692).

### **W2A - Permitted Activities**

**Permit condition 2.1.1: Permitted activities states: "The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities")."**

<b>Table S1.1 activities</b>		
<b>Activity reference</b>	<b>Description of activities for waste operations</b>	<b>Limits of activities</b>
Treatment of inert and excavation waste aggregates	<p><b>R13:</b> Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p> <p><b>R5:</b> Recycling/ reclamation of other inorganic compounds</p>	<p>All wastes must be stored and treated on hardstanding or on an impermeable surface with sealed drainage.</p> <p>Treatment operations shall be limited to manual and/or mechanical:</p> <ul style="list-style-type: none"> <li>- sorting and/or separation</li> <li>- screening</li> <li>- bulking up</li> </ul> <p>of permitted waste for the purpose of recovery only.</p> <p>Waste types as specified in Table S2.1.</p>

With reference to Table S1.1, Permit EPR/DB3595HV limits the site activities to: the treatment of inert and excavation waste aggregates via recovery (R) operations R13 or R5. These operations are limited to manual and/or mechanical sorting/separation, screening or bulking up. These operations must be conducted on hardstanding or impermeable surface with sealed drainage. The permit limits the site to accept a maximum of 100,000 tonnes of waste per calendar year, with a maximum quantity of 25,000 tonnes of waste to be stored at the site at any one time.

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### **Waste Exemptions:**

During the meeting, and in following correspondence, it has been established that a T5 waste exemption is currently registered adjacent to the permitted site boundary. Whilst this poses no issue under current regulatory conditions, I encourage the site to consider potential incoming reforms to the waste exemption system. One such potential change is the prohibition the use of exemptions at,

or adjacent to permitted sites.

Under the proposed changes, the use of waste exemptions at or adjacent to permitted sites, will be prohibited. The concept of a "direct link" will also be established, where an exempt activity is carried out adjacent to a permitted waste operation. An exempt activity will be considered a direct link when: Carried out under the control of the same operator, or uses the same staff, equipment or infrastructure. The concept of a direct link will be used to assess if an exemption is to be prohibited adjacent to a permitted waste site.

The T5 waste exemption, registered adjacent to the site boundary, permits the treatment of wastes other than those listed within Table S2.1 of the site's permit. This in theory would allow the site to extend its waste activities beyond the limits and conditions of its environmental permit. Under the proposed changes such a situation would require the site to apply for a permit variation.

NRW note that the registered T5 waste exemption adjacent to the site boundary expires on the 26th of September 2026. NRW also note that in following correspondence, the site is inclined to allow the exemption to expire but may review this dependent on future guidance and regulatory expectations.

**W2E - Waste Acceptance:**

**Permit condition 2.3.2 states that: "waste shall only be accepted if: (a) it is of a type and quantity listed in schedule 2 table(s) S2.1 [,S2.2 etc.]; and (b) it conforms to the description in the documentation supplied by the producer and holder".**

## Schedule 2 - Waste types, raw materials and fuels

<b>Table S2.1 Permitted waste types and quantities for treatment of inert and excavation waste aggregates</b>	
<b>Maximum quantity</b>	The maximum quantity for waste to be accepted on site shall not exceed 100,000 tonnes per year.
<b>Exclusions</b>	Notwithstanding the waste types set out in this table, wastes having any of the following characteristics shall not be accepted: <ul style="list-style-type: none"> <li>• consisting solely or mainly of dusts, powders or loose fibres</li> <li>• sludges or liquids</li> </ul>
<b>Waste code</b>	<b>Description</b>
<b>01</b>	<b>WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS</b>
<b>01 01</b>	<b>wastes from mineral excavation</b>
01 01 01	wastes from mineral metalliferous excavation
01 01 02	wastes from mineral non-metalliferous excavation
<b>01 04</b>	<b>wastes from physical and chemical processing of non-metalliferous minerals</b>
01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	waste sand and clays
<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b>
<b>17 01</b>	<b>concrete, bricks, tiles and ceramics</b>
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
<b>17 02</b>	<b>wood, glass and plastic</b>
17 02 02	glass
<b>17 03</b>	<b>bituminous mixtures, coal tar and tarred products</b>
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
<b>17 05</b>	<b>soil (including excavated soil from contaminated sites), stones and dredging spoil</b>
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 08	track ballast other than those mentioned in 17 05 07
<b>19</b>	<b>WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE</b>
<b>19 12</b>	<b>wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</b>
19 12 09	minerals (for example sand, stones)
<b>20</b>	<b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b>
<b>20 02</b>	<b>garden and park wastes (including cemetery waste)</b>
20 02 02	soil and stones

During the call and with reference to the site's EMS, the site's waste acceptance procedures were outlined and discussed. The site EMS outlines the requirements the site implements for waste acceptance, outlining that waste producers must provide the following for waste to be accepted at the site:

- Source and origin of the waste.
- The processes producing the waste (including SIC Code).
- Characteristics of the waste including EWC/LOW code.
- Potential risks to the environment.
- Appearance of the waste.
- Confirmation that the waste is appropriate.
- Appropriate treatment where applicable.

The site EMS also outlines how on-site verification of the waste, including a visual inspection of the waste, is to be undertaken by a suitably qualified member of staff, this process will also include a comparison to the written description of the waste on the corresponding waste transfer note, to confirm suitability for acceptance on the site. NRW note that the site will allow the waste producer to provide this information in a number of

ways, but also provide a waste acceptance form that customers can fill (as shown in Appendix C - Forms of the site EMS).

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### **On site waste acceptance**

On the call, the site's waste acceptance procedures were discussed and confirmed. It was confirmed that all vehicles bringing waste on to the site will report to the weighbridge office, where:

- Initial verification of the waste transfer note and any other paperwork will be made, to confirm it's suitability for acceptance.
- Visual inspection will be undertaken to confirm it's description against the relevant paperwork.
- Finally the driver will sign a ticket confirming the waste conforms with the transfer note.

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### **Rejected Wastes**

The site EMS outlines that any wastes that do not conform following the previously outlined procedures will be rejected and recorded as "rejected" in the site diary and a waste rejection form would be completed as shown in Appendix B - Forms in the site EMS.

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### **Mirror non-hazardous waste codes**

During the call, It was outlined how the EMS states that as outlined in Section 2 of "*Guidance on the classification and assessment of waste (1st Edition v1.2.GB) Technical Guidance WM3*". Where steps 1-3 are applied to all wastes, steps 4-7 are applied to mirror non-hazardous waste codes. If however during Step 5, hazardous substances are identified the waste would not be accepted at the site, and that it is the responsibility of the waste producer to provide documentation of the process to the site operator.

It was also confirmed on the call that compliance testing of such waste is undertaken by the site a minimum of three times a year for non-homogenous wastes, and a minimum of once a year for homogenous wastes.

It was confirmed to myself on this call that should compliance testing reveal any differences from the paperwork provided by waste producers, acceptance of this waste stream would cease, until further testing can demonstrate that the waste is suitable for continued acceptance at the site.

It was encouraging to hear that the site will be providing training to all weighbridge staff prior to the site becoming operational, to ensure that they are fully versed in relevant waste acceptance procedures.

**W2G - Improvement Programme**

Permit condition 2.4.1 states that: "The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by Natural Resources Wales".

**Table S1.3 Improvement programme requirements**

Reference	Requirement	Date
IPC1	<p>Following successful commissioning and establishment of routine steady operation<sup>1</sup>, the Operator shall undertake a BS 4142:2014+A1:2019 noise impact assessment following guidance set out in Noise and Vibration Management: Environmental Permits and Method implementation document (MID) for BS 4142, to demonstrate that impacts do not exceed those specified in the Noise Impact Assessment – Noise Assessment (Minffordd Quarry) – revision P02.</p> <p>Upon completion of the work, a written report shall be submitted to Natural Resources Wales for approval.</p>	6 months after permit issue or otherwise agreed in writing with Natural Resources Wales

With reference to table S1.3 above, it is outlined that the site shall undertake a BS 4142:2014+A1:2029 noise impact assessment, submitting a written report to NRW for approval, "6 months after permit issue, or otherwise agreed in writing with Natural Resources Wales". It was established during the call that the site will be undertaking the required BS 4142:2014+A1:2019 noise impact assessment once the site has become fully operational.

**Action: Notify NRW when the site is to become operational, and outline in writing a date by which NRW can expect to receive a report on a completed BS 4142:2014+A1:2029 noise impact assessment".**

**W3G - Fire:**

During the call, it was outlined that the site does not believe a Fire Prevention and Mitigation Plan (FPMP) to be needed due to the inert nature of wastes that the site accepts and treats. Review of the site permit also confirms that there is no permit condition requiring a FPMP.

**W4B - Reporting:****Quarterly Waste Returns**

It is noted that as the site is not currently operational, that all waste returns up to the most recent submitted on 15/01/2026 have been null waste returns.

**W4C - Notification**

Permit condition 4.3.1 states that: "Natural Resources Wales shall be notified without delay following the detection of:

(a) any malfunction, breakdown or failure of equipment or techniques, accident, or

**emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;**

**(b) the breach of a limit specified in the permit; or any significant adverse environmental effects.**

**(c) the breach of a limit specified in the permit; or any significant adverse environmental effects".**

On the call it was confirmed that the site is aware if when to use and submit a Schedule 5 notification, furthermore Section 7.2 of the site EMS states: *"NRW shall be notified, without delay, following the detection of:*

- *Any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;*
- *The breach of a limit specified in the permit and / or;*
- *significant adverse environmental effects".*

*This section of the EMS if fully implemented adequately meets the requirements set out in permit condition 4.3.1.*

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NRW would like to thank John Evans, Paul Anthony Williams, and Neil Williams for their time during the call. Please find relevant useful links at the bottom of this report.

**\*end\***

Yours faithfully

Kieran Evans

Waste Regulation Officer

In this document "Natural Resources Wales" means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order.

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Please find below relevant links:

- NRW guidance on how to comply with your environmental permit:
  - [How to comply with your environmental permit](#)
- Reforming the waste exemptions system
  - [DEFRA Policy paper: Reforming the waste exemptions system](#)
- Service to change to, or vary a bespoke waste permit:
  - [Natural Resources Wales / Apply to change to, or vary, a bespoke waste](#)

[permit](#)

- The document that explains how we assess the competence of permit holders:
  - [Regulatory guidance note 5: operator competence](#)
- Technical guidance on how to assess and classify waste:
  - [Guidance on the classification and assessment of waste: Technical Guidance WM3](#)
- NRW guidance on how business compliance is assessed:
  - [How we assess business compliance](#)
- Link to an Operational Risk Assessment (OPRA) spreadsheet:
  - [OPRA spreadsheet](#)
- NRW guidance on charging schemes and annual subsistence fees:
  - [Our charging schemes](#)

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.