

Compliance Assessment Report CAR_NRW0050914

Permit being assessed: CB3896ZW.

For: Unit 15 Drome Road, **held by:** Telecycle Europe Limited

At: Deeside Industrial Park, Sealand Garden City, Deeside, Flintshire, CH5 2NY.

Type of assessment: Site Inspection,

Reason: Routine.

On: 23/02/2026 between 10:25 and 11:20.

Parts of permit assessed: 1.1.1.

NRW Lead Officer: Ian Thomas2, accompanied by Molly Callow.

Report sent to: Jeremy Pudge, TCM, on 05/03/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W4A - Waste - Information - Records	Action only (X)	
W2D - Waste - Operations - The site	Action only (X)	
W4A - Waste - Information - Records	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
W4A	Update of waste returns for 2024 and 2025 to reflect TFS loads to Non UK destinations	Already completed
W2D	Ensure all storage is within the warehouse facility	31/03/2026
W4A	Supply copy of waste transfer notes of materials taken to comtek and returned, plus any materials sent to Wrexham address for storage.	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.

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

On Monday the 23rd of February 2026 Natural Resources Wales attended site.

This was a routine site inspection for permit ref EPR/CB3896ZW which was carried out by Waste Regulation Officer Ian Thomas, accompanied by Haz waste officer Molly Callow.

On arrival at site, officers met with Ryan Eaton, warehouse manager, who accompanied them throughout the visit. Dean Graham, site manager and Jeremy Pudge, TCM, were not on site.

The site is busy with bags being unloaded at the front of the unit area, Ryan explained that the site is running at near capacity with loads being turned around quickly. The loads consist of electronic boards of varying grades. The majority of which were planned to be exported to Japan to be smelted.



Varying grades of electronics.



Shredded electronics

Little dismantling for recovery is taking place. As before, the permit allows the processing of catalytic converters, and the machine is located inside the warehouse, no catalytic converters are being accepted. The machine is not operational.

The TCM for the permit is Jeremy Pudge, Jeremy is taking a more active role at the site and is regularly on site looking after the permit side of the facility.

All work is carried out inside the warehouse, one forklift truck is used. Security for the warehouse and site is covered by intruder alarms and live video connection. Gas bottles for use on the forklift are securely locked away in a cage and a secure box is being installed at the front of the unit for access by emergency services in case of any incidents.

The site diary and visitor book are being utilised and copies of the permit and FPMP are kept in the office.

The warehouse area is quite full with bags of electronics, the concern is that the amount of materials viewed outside the building would not fit into the warehouse for storage overnight. It is understood that the plan is to ship these materials out on the same day, but in the event of being let down by hauliers or other unseen events, there is no storage available to house the bags.

Ryan explained that some storage was utilised at another facility on the industrial estate, however this was short term. Also, an application has been made for a permit at a unit on Wrexham Industrial Estate. Please note that until a permit is granted for this facility no treatment activities should be carried out. If any materials have been sent to the Wrexham address for storage then copies of transfer notes should be supplied to NRW.

Action – please supply copies of all transfer notes for materials sent to Comtek site, and return. please action by 30th April 2026.

Waste returns for 2024 and 2025 have been checked, in view of this, waste removed for 2025 show only materials sent to Flintshire, all waste materials removed from site must be recorded as a waste removed. There is the option to record shipments sent abroad as Non-UK Destination. A review of the waste returns should be carried out and re submitted with accurate waste removal quantities and destinations.

Thank you for assisting us with the inspection. Kind regards, Ian Thomas, Waste regulation Officer Please find your new regulating officer's contact details below. Email:

ian.thomas2@cyfoethnaturiolcymru.gov.uk

Natural Resources Wales, Chester Road, Buckley, Flintshire, CH7 3AJ 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

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.