

Compliance Assessment Report CAR_NRW0051309

Permit being assessed: DB3597HD.

For: Henllys, **held by:** 4Recycling Ltd

At: Henllys, Llanfair T.H., Conwy, Conwy, LL22 8TF.

Type of assessment: Other,

Reason: Routine.

On: 27/03/2026.

Parts of permit assessed: As below.

NRW Lead Officer: Kieran Evans.

Report sent to: Dawn Loos, Site Environmental Consultant, on 06/05/2026.

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	Action only (X)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2C - Waste - Operations - Operating techniques	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Action only (X)	
W4A - Waste - Information - Records	Action only (X)	
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
W1A	Clearly set out within the Environmental Management System (EMS) when it is to be reviewed, either as a whole management system document or by relevant individual sections. This should include both periodic reviews and reviews triggered by specific circumstances. Also include a site plan on your EMS. When these changes have been made to the EMS, please send a copy to NRW.	01/08/2026
W2E	All reference to any permit other than that which the site operates under should be removed from the EMS, to accurately link the management system to site operations. Once this has been completed, please send a copy of the EMS to NRW.	01/08/2026
W4A	Amend the minimum storage time for records required by the site permit to a minimum of 6 years, within the site's EMS, to comply with permit condition 4.1.1 (d). Once completed, please send a copy of the EMS to NRW.	01/08/2026

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 meeting to complete the "First Inspection Checklist" for the recently granted permit EPR/DB3597HD, at Henllys, Llanfairtalhaiarn, Conwy, LL22 8TD, conducted via a Teams call at 9am on Friday the 27 March 2026.

Representing Natural Resources Wales (NRW) was: Waste Regulation Officer, Kieran Evans, Representing 4R Recycling Ltd was: Environmental Consultant, Dawn Loos, General Manager, Nigel Box, and Agricultural Recycling Manager, Matthew Conolly. It was established that 4R Recycling Ltd are acting as the point of contact on behalf of the landowner in regards to the site permit.

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".

During the meeting, it was established that the permitted site is a lined earth bank lagoon, currently being operated for the receipt and storage of potable water sludge (LoW 19 09 02). Following the conclusion of the first inspection checklist meeting, NRW received a copy of the site's operating guidance via email (received on 27 March 2026). It is noted that the operating guidance consists of the following sections and documents, in order to form a written management system or "Environmental Management System" (EMS) as required by permit condition 1.1.1(a):

- *Material Pre-acceptance Procedure.*
- *Material Acceptance Procedure.*
- *Material Rejection Procedure.*
- *Material Despatch Procedure.*
- *Material Out Of Specification For Recycling*
- *Store Management Plan*
- *Storage Risk Assessment*
- *Air Emissions Monitoring*
- *Dust Management Plan*
- *Litter Management Plan*
- *Noise Management Plan*
- *Odour Management Plan for 4R Group*
- *Spillage Prevention Plan*
- *Spill Response Procedure*
- *Accident and Incident Management Plan*

It is noted that many of the above listed sections/documents which form the EMS have varying dates, issue and version numbers, indicating that many of the above listed sections and documents within the EMS have been reviewed and amended previously. Section 3.5 of the *Odour Management Plan for 4R Group*, contained within the overall EMS states that: *"The odour management plan will be reviewed regularly and also if any complaints are received."*

NRW's guidance document *How to comply with your environmental permit* further states: *"You must continually assess your management system to monitor the effectiveness of your operations and make changes to it if it fails or when you can see ways of improving it."*

However, a review of the site's EMS found that, aside from the *Odour Management Plan for 4R Group*, there are no defined review timescales or trigger circumstances for the document as a whole or for other relevant sections or documents that form the overall EMS.

Action: Clearly set out within the Environmental Management System (EMS) when it is to be reviewed, either as a whole management system document or by relevant individual sections. This should include both periodic reviews and reviews triggered by specific circumstances. Once completed, please send a copy of the amended EMS to NRW.

Page 21 of NRW guidance: *"How to comply with your environmental permit"* stipulates that

your EMS requires a site plan to be present within it. Any such site plan requires the following, in cases of relevance to the site's permitted activity:

- The activities carried out along with any discharge points.
- A drainage plan, identifying any surface and foul drains (including their final destination).
- Locations of any waste activities.
- Location of any chemical/oil storage facilities.
- Local receptors (sensitive or important), such as: rivers, sensitive wildlife areas or underlying groundwaters.
- Potentially contaminated land.

Upon review of the site's operating guidance, no site plan can be seen.

Action: Please include a site plan within the EMS. Once this has been completed, please send a copy of the amended EMS to NRW.

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

During the meeting it was confirmed that Mr Jonathan Lloyd is the site Technically Competent Manager (TCM). NRW have reviewed the Chartered Institution of Waste Management (CIWM) records, and can confirm that Mr Jonathan Lloyd currently holds valid continuing competence.

W2A - Permitted Activities

Permit condition 2.2.1: Permitted activities states: "The operator is only authorised to carry out the activities specified in table 2.1 below ("the activities").

Table 2.1 activities

Description of activities	Limits of activities
R13: Storage of wastes	<p>Secure storage of waste listed in table 2.2</p> <p>Waste shall not be stored on site for longer than 3 years.</p> <p>The maximum quantity of waste accepted shall not exceed 75,000 tonnes per year.</p> <p>The maximum storage capacity of the site shall not exceed 75,000 cubic metres.</p> <p>Individual wastes must be stored separately.</p>

With reference to Table 2.1, permit EPR/DB3597HD limits the permitted site activities to: storage of wastes, limited to the waste types listed in table 2.2 of the site permit, via recovery (R) operation R13 (storage of wastes), for a maximum of 3 years. The permit limits the site to accept a maximum quantity of 75,000 tonnes of waste per calendar year, with a maximum of 75,000 cubic meters of waste to be stored at the site at any one time.

Table 2.1 stipulates that individual waste types must be stored separately.

W2C - Operating Techniques

Permit condition 2.4.1 states: "The activities shall be operated using the techniques and, in the manner, described in Table 2.3 below:"

Table 2.3 Operating techniques

1. All stackable wastes shall be securely stored on an impermeable surface with sealed drainage.
2. Waste digestate and other high readily available nitrogen wastes shall only be within covered containers or covered lagoons which shall be of a design and capacity fit for purpose.
3. All non-stackable waste shall be stored within a secure container or containers (including lagoons) of an appropriate capacity, designed and constructed in accordance with an appropriate specification in CIRIA Report C759 Livestock manure and silage storage infrastructure for agriculture
4. Non-stackable waste shall not be stored within 0.3 metres of the top of an open storage container or within 0.75 metres of the top of a lagoon
5. Wastes consisting solely or mainly of dusts, powders or loose fibres shall be stored in a building.

With reference to Table 2.3 of the site permit places the following conditions upon the operating techniques permitted at the site:

- Stackable wastes to be stored on an impermeable surface with sealed drainage.
- Waste digestate and other high readily available nitrogen wastes are only to be within covered lagoons or containers of a design and capacity fit for purpose.
- Non-stackable wastes are to be stored within secure containment (including lagoons) of an appropriate capacity. Such storage must be designed and constructed in accordance with an appropriate specification, as stipulated in CIRA Report C759 Livestock manure and silage storage infrastructure for agriculture.
- Non-stackable waste shall not be stored within 0.3 meters of the top of open storage containers or within 0.75 meters of the top of a lagoon.
- Wastes consisting of powders, dusts and loose fibres are to be stored within a building.

With reference to the *Store Management Plan*, outlined within the sites EMS, the following actions are outlined and noted:

- Lagoon is of sufficient engineering quality (1x10 -9m/s) to prevent liquid escaping.
- New build lagoons engineered in accordance with SSAFO (storing silage, slurry and agricultural fuel oil) regulations.
- Lagoons to be kept as empty as possible, with a minimum free board of 750mm (0.75 meters) from the top of the lagoon.

W2D - The site

With reference to the below image, the area in which storage of wastes to be used in land treatment is permitted, is within the area highlighted in green.



Within correspondence following the initial first inspection meeting, a potential discrepancy regarding the correct site address was noted. The permitting department investigated this issue. As of the 6 May 2026, the address listed on the permit was changed via an NRW led variation, to accurately reflect the location of the site.

W2E - Waste Acceptance

Permit condition 2.3.1 states that: "Waste shall only be accepted if: (a) it is of a type and quantity listed in table 2.2 below; and (b) it conforms to the description in the documentation supplied by the producer and holder".

During the meeting, it was confirmed that the site is currently only accepting potable water sludge (LoW 19 09 02 sludges from water clarification). Low 19 09 02 is a waste type that is listed on Table 2.2 of the site permit, and is therefore a waste type that the site is permitted to accept. It was established that the procedures for waste acceptance were outlined within the site's EMS.

NRW note the following relevant sections of the site's EMS, in relation to waste acceptance procedures:

- *Material Pre-acceptance Procedure*
- *Material Acceptance Procedure*
- *Waste Acceptance Procedure*
- *Material Rejection Procedure*

-

Material Pre-acceptance Procedure

The *Material Pre-acceptance Procedure* of the EMS outlines the relevant documentation, samples and chemical analysis that the site requires in within the material pre-acceptance stage of waste acceptance.

-

Material Acceptance Procedure

The *Material Acceptance Procedure* outlines the relevant checks and verification that are required at the *Material acceptance stage* of waste acceptance.

-

Waste Acceptance Procedure

It is noted that the site's EMS contains a *Waste Acceptance Procedure* in combination with the aforementioned *Material Acceptance Procedure*, it is assumed that both of these policies apply in combination for the acceptance of material/wastes at the site.

Whilst the *Material Acceptance Procedure* and the *Waste Acceptance Procedure* share/mirror many procedures, there are areas of the *Waste Acceptance Procedure* that are more site specific in its procedures and gives a more detailed description of the roles and responsibilities of the site TCM for waste acceptance.

Upon review of step 4 of the *Waste Acceptance Procedure* it is stated that: "*no wastes other than that listed in this permit (EPR/DB3497ZC)*", are to be accepted at the site.

Permit EPR/DB3497ZC is a different permit than that in which this site undertakes its activity (Permit EPR/DB3597HD). Whilst currently both sites are operating under Standard Rules SR2020 No17, and therefore the permitted waste types (LoW codes) that both permits allow for acceptance are identical, variation of either permit in future could change this.

4R Recycling Ltd must amend the EMS to ensure that any reference to a permit other than that which the site operates under are removed. Such an amendment will accurately link the site's specified permit to waste acceptance within the EMS.

Action: All reference to any permit other than that which the site operates under should be removed from the EMS, to accurately link the management system to site operations. Once this has been completed, please send a copy of the updated EMS to NRW.

-

Material Rejection Procedure

The *Material Rejection Procedure* of the site's EMS outlines that material should be rejected in the following circumstances:

1. The reference samples are not representative of the pre-acceptance paperwork.
2. When the producer can not verify indicator parameter readings that do not conform with tolerances established by initial sample data, nor provide a statement of benefit (presumably to agriculture).

Permit condition 2.3.2 states: "Records demonstrating compliance with rule 2.3.1

shall be maintained."

It is noted that the areas of the EMS covered in this form, relating to waste acceptance (*Material Pre-acceptance Procedure, Material Acceptance Procedure, Waste Acceptance Procedure and Waste Rejection Procedure*), all outline that records are to be stored and retained for a minimum of three years.

W4A - Records

Permit condition 4.1.1 states: "All records required to be made by these standard rules shall:

(a) be legible;

(b) be made as soon as reasonably practicable;

(c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and

(d) be retained, unless otherwise agreed by Natural Resources Wales, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender;

(i) off-site environmental effects; and

(ii) matters which affect the condition of land and groundwater."

As previously outlined in the site's EMS, relevant records in relation to waste acceptance are specified to be retained for a minimum of 3 years. Permit condition 4.1.1 (d) stipulates that all records required by this permit are to be retained for a minimum of 6 years.

Currently these minimum record storage times outlined in the sites operating guidance do not comply with the minimum record retention period, as outlined in permit condition 4.1.1 (d).

Action: Amend the minimum storage time for records required by the site permit to a minimum of 6 years, within the site's EMS, to comply with permit condition 4.1.1 (d). Once completed, please send a copy of the EMS to NRW.

W4B - Reporting

Permit condition 4.2.2 states: "Within one month of the end of each quarter, the operator shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and waste accepted and removed from it during the previous quarter."

NRW records indicate that the site has submitted it's waste returns for the first quarter of 2026. At the time of writing, these are currently in the process of being reviewed by the waste returns department.

W4C - Notification

Permit condition 4.3.1 states: "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 these standard rules; or

(c) any significant adverse environmental effects.

During the meeting, it was established that 4R Group Ltd, are aware of the circumstances in which notification of NRW is required.

Further to this, the *Material Out Of Specification For Recycling* section of the site's EMS states:

"This operating procedure defines a system to ensure that identification and a correct sequence of events takes place to mitigate or control the situation if the following occurs;

- 1. A situation which results in or may result in the company being unable to conduct its business in a safe and/or legal manner.*
- 2. A situation has or may give rise to a situation in contravention of the company's policies."*

In such cases, should the reporting processes outlined within the site's "*Material Out Of Specification For Recycling*" section of the EMS be fully implemented, from identification of an incident through to notification of NRW, this will assist the site in meeting the requirements set out in permit condition 4.3.1.

-

NRW would like to thank Dawn Loos, Nigel Box, and Matthew Conolly for their time during the call, and in following correspondence.

"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".

-

Please find below relevant links to further advice:

- NRW guidance on how to comply with your environmental permit:
 - [How to comply with your environmental permit](#)
- Service to change to, or vary a bespoke waste permit:
 - [Natural Resources Wales / Apply to change to, or vary, a bespoke waste permit](#)
- The following document explains how we assess the compliance of permit holders:

- [regulatory-guidance-note-5-operator-competence.pdf](#)
- NRW guidance on how business compliance is assessed:
 - [Natural Resources Wales / How we assess business compliance](#)
- NRW guidance on charging schemes and annual subsistence fees:
 - [Natural Resources Wales / Our charging schemes](#)
- Link to an Operational Risk Assessment (OPRA) spreadsheet:
 - [opra-v26-2026-27.xlsx](#)

ENDS

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.