Cyfoeth Naturiol Cymru
Natural Resources Wales

Compliance Assessment Report CAR_NRW0051669

Permit being assessed: JB3531AB.

For: Enviroventure Waste Solutions Recycling Facility, **held by:** Enviroventure Waste Solutions Limited

At: Waterston Ind Est, Waterston, Milford Haven, Pembrokeshire, SA73 1DP.

Type of assessment: Site Inspection,

Reason: Routine.

On: 23/04/2026 between 11:00 and 12:00.

Parts of permit assessed: See Below.

NRW Lead Officer: Michael Edwards, accompanied by Alex Underhill.

Report sent to: Diana Jones, TCM/Operator, on 07/05/2026.

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	C2 Significant	1.1.1 (a)
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2D - Waste - Operations - The site	C2 Significant	2.2.1

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

Total non-compliances recorded	Total non-compliance score
2	62

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	Review current EMS to ensure that all risks are identified and ensure that systems are introduced that minimise the risks as per condition 1.1.1. a.	31/07/2026
W2D	Remove wastes from encroaching on neighbouring properties and ensure wastes are stored within the permitted	31/07/2026

Criteria	Action needed	Complete by
	boundaries.	

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

Unannounced site inspection undertaken by Michael Edwards and Alex Underhill of Natural Resources Wales accompanied on site by permit holder. This was a routine site inspection to determine compliance with the conditions of the Environmental Permit.

The weather was clear at the time of and in the lead up to the inspection has been clear.

General Management - W1A – Category 2

During the inspection it was again noted that stockpiles of waste have not reduced from the previous inspections and continue to be a significant fire risk to the site and area.

Whilst some external issues have resulted in difficulties in removing the wastes from site to a suitably authorised facilities for final disposal. It is becoming evident that more efforts in producing contingency plans is required.

As discussed on site, the current storage practices pose significant concerns for an incident to occur. Under **condition 1.1.1 (a)** the operator is required to produce and operate to a management system that identifies and minimises the risk of pollutions, accidents, non conformances and incidents.

Image 1 - height of middle stockpile of waste with NRW officer for scale

Given the current and ongoing storage practices on site, it is clear that the current management system is insufficient in recognising and reducing the potential environmental risks involving the volume of wastes currently stored on site.

Due to the potential significance of an incident occurring due to the current storage and management practices on site, this has been scored as a Category2 breach of condition 1.1.1 (a).

Action – complete a full review of the current management systems of the site to ensure that contingencies are put in place to identify risk relating from operations and minimise the potential impacts as required.

The revised management system will ensure compliance with **condition 1.1.1(a)** by not only identifying risks associated with waste storage but also ensuring those risks are actively managed and reduced through appropriate actions, including the removal of waste contributing to potential incidents, which is not currently being achieved

A copy of the TCM certification was provided on request to officers in attendance which is valid until January 2028, along with copies of the permits and current EMS as required under **conditions 1.1.3 and 1.1.4**.

Waste Operations – W2A, W2D - Category 2.

Wastes were stored in 3 distinct stockpiles, on an impermeable surface with fire breaks.

Under **condition 2.2.1** the site is required to store all wastes within the permitted boundary as shown in **schedule 7** of the permit. On inspection of the neighbouring operation, the officers identified that wastes from Enviroventure were entering into the neighbouring business.

A similar issue has been identified in a previous CAR. The ongoing issues with storage practices demonstrates the inadequacies of the current storage methodologies and practices observed on site

and as described in the current Management Systems.

This has been scored as a **Category 2 breach** of permit **condition 2.2.1.** for allowing wastes to be stored outside of the permitted boundaries contrary to the above condition, which has the potential to cause a significant incident.

As the root cause of this issue has been identified as the current management systems, please see the above action (***General Management – W1A***) requirement regarding the current management procedures.

Action - remove wastes away form the neighbouring property and ensure that all wastes are stored within the permitted boundaries as required under condition 2.2.1.

Under **condition 2.3.1 (a) and Schedule 1** of the environmental permit, all wastes must be stored and treated on an impermeable surface with a sealed drainage system. During the inspection, a pool of water was identified within the area of hard standing with a skip stored over it. As discussed on site, the discolouration of the water is of concern, and is unlikely to be considered clean surface water.

image 2 - discoloured surface water pooling on area of hardstanding with empty storage skip placed on top.

As discussed on site, ensure that all drainage infrastructure is maintained to ensure proper function and ensure that all wastes are stored within the conditions of the permit.

Many thanks for your time during the inspection.

END

Any compliance criteria not highlighted in the above summary should be considered as not assessed. In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resource Body for Wales (Establishment) Order 2012. You should note that the Natural Resources Body for Wales has been formed by bringing together the Countryside Council for Wales, Forestry Commission Wales and Environment Agency Wales. The Natural Resources Body for Wales has been empowered to exercise Welsh devolved functions since 1 st April 2013 and has, generally, taken over the responsibilities of the Countryside Council for Wales, the Forestry Commissioners and the Environment Agency for Wales.

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.