

Compliance Assessment Report CAR_NRW0048342

Permit being assessed: EP3698FL.

For: Nantycaws H C I Transfer & Treatment Facility, **held by:** CWM Environmental Ltd

At: Nantycaws Landfill Site, Llanddarog Road, Nantycaws, Carmarthen, Carmarthenshire, SA32 8BG.

Type of assessment: Site Inspection,

Reason: Routine.

On: 13/05/2025 between 09:30 and 10:30.

Parts of permit assessed: Composting compliance.

NRW Lead Officer: Daniel Packer.

Report sent to: Paul Wakelin, Head of Operations, 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
IR3I - Installations - Emissions and monitoring - Fire	C3 Minor	3.7.1
IR2C - Installations - Operations - Operating techniques	C3 Minor	2.3.1
IR1A - Installations - Management - General Management	C3 Minor	1.1.1

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

Total non-compliances recorded	Total non-compliance score
3	12

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
IR3I	Bring site back into compliance with FPMP	21/07/2025
IR2C	Bring the site/area back into compliance with the permit.	21/07/2025
IR1A	Bring the site/area back into compliance with the permit.	21/07/2025

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

A site visit was undertaken by NRW and the Head of Operations for CWM Environmental Ltd at the Nantycaws site on 13.05.2025.

The purpose of the visit was a follow up inspection of the open windrow composting facility, to see how the required actions from previous site visit referenced in CAR NRW0046671 were progressing.

During the site walk over it was observed that the green waste stockpiles are still exceeding the limits on stack height, width and separation distances outlined Guidance Note 16 Fire Prevention and Mitigation Plan Guidance - Waste Management and out of compliance with your Standard Operating Procedure(SOP).

Whilst we can see that some progress has been made on the front southern / south-eastern face, green waste is still being deposited shown below and progress appears slow.





Photo above showing scale of green stockpiled feedstock waste

The operator explained there is currently 1x CWM shredder on-site processing incoming fresh waste. 2x hired shredders for processing older stock, 1 mobile screener and 1 dual drum static screener.

There have been mechanical issues with the 3 shredders above during the last 2 week and a fourth shredder has been ordered. The operator has also ordered replacement parts to repair the mechanical issues, to allow all equipment to be back up and running.

The equipment failure will mean that the operator is at least 4 weeks behind proposed schedule.



Photo above showing mobile screener



Photo above showing dual drum static screener



Photo above showing mobile shredder and composting windrows.

During the site walkover it was also observed that the green waste stockpile is still stacked on both the impermeable concrete pad, but also on the soft permeable ground adjacent. This is a cause for concern as any runoff of the material being stored on the permeable ground will bypass the purpose made sealed drainage system out into the wider environment. This is also impeding clear access outlined in the Guidance Note 16 Fire Prevention and Mitigation Plan Guidance - Waste Management.

Compliance – this has resulted in a breach of permit condition 3.7.1 as not adhering to Fire Prevention and Mitigation Plan submitted and approved previously under improvement condition 2 (IC2). This has been assigned a non-compliance category of C3 under compliance criteria IR3I Fire.

This is also a breach of permit condition 2.3.1 operating techniques and has been assigned a non-compliance category of C3 under compliance criteria IR2C Operating techniques.

This is also a breach of permit condition 1.1.1 as there is a failure in management to comply with the Composting SOP and Fire Prevention and Mitigation Plan which form part of the procedures under your Environmental Management System. These non-compliances have been assigned a non-compliance category of C3 under compliance criteria IR1A General management.

The above non-compliance scores will be suspended pending determination of the actions issued in previous CAR NRW0046671. The score is suspended with the following caveat; if the actions required are not acted upon within the agreed time scale stipulated the scores will be applied retrospectively.

Note that this CAR form has been undertaken in the context of the permit relevant to the waste

treatment composting activity, and not the waste operations at the remainder of the site falling under a separate permit.

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.