

Compliance Assessment Report CAR_NRW0051509

Permit being assessed: DB3598CW.

For: Cefn Graianog Quarry, **held by:** Tudor Griffiths Limited

At: Llanllyfni, Caernarfon, Gwynedd, LL54 6SY.

Type of assessment: Site Inspection,

Reason: Routine.

On: 15/04/2026.

Parts of permit assessed: As below.

NRW Lead Officer: Kieran Evans.

Report sent to: Kevin Gardiner, Technically Competent Manager (TCM), on 11/05/2026.

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	Assessed (A)	
W3G - Waste - Emissions and monitoring - Fire	Assessed (A)	
W4A - Waste - Information - Records	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
W1A	Notify NRW when the site is to become operational.	31/08/2026

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 First Inspection Checklist of Cefn Graianog Quarry, Llanllyfni, Caernarfon, Gwynedd, LL54 6SY, for the recently granted permit: EPR/DB3598CW, conducted via a Teams call on 15 April 2026. During this call, it was established that the site is currently within a pre-operational phase.

Representing Tudor Griffiths Limited was: Site Technically Competent Manager (TCM): Kevin Gardiner, and Quarry Manager Huw Thomas.

W1A - General Management:

Permit condition 1.1.1 states: The operator shall manage and operate the activities:

(a) in accordance with a written management system that identifies and minimises the 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; and

(b) using sufficient competent persons and resources.

NRW note that a copy of the site's Environmental Management System (EMS), was received on 16 October 2025. It is noted that the EMS is dated as "February 2025", and covers the following areas:

- General Considerations.
- Site Infrastructure.
- Site Operations.
- Environmental Control, Monitoring and Reporting.
- Site Records.
- Contingency Planning.

It is noted that section 1.6.3 of the EMS states: *"The management system will be reviewed as a minimum every 4 years. However, reviews will also take place in the event of.*

- *Change in site operations.*
- *Change in plant/equipment that affects the activities covered by the permit.*
- *A permit variation is applied for.*
- *After any accident, complaint or breach of permit.*
- *If a new environmental problem emerges and additional control measure(s) have been implemented"*

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

NRW have reviewed the Chartered Institution of Wastes Management (CIWM) records, and have confirmed that site TCM Kevin Gardiner currently holds valid continuing competency.

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WRAP quality protocol guidance

To enable Tudor Griffiths Limited to achieve end of waste status for recycled aggregates produced at Cefn Graianog Quarry. Tudor Griffiths Limited is required to comply with the requirements of the WRAP quality protocol, which involves the creation of a Factory Production Control document. NRW note that Appendix 4 of the site's EMS: *Quality Management System - Production of Soil, Soil Substitutes and Aggregates* is to serve as the site's Factory Production Control Document.

Please find further information relating to the WRAP quality protocol here:

[CD1.Y Quality Protocol. Aggregates from inert waste. End of waste criteria for the production of aggregates from inert waste. WRAP October 2013..pdf](#)

Please be aware, end of waste for soils and clays can not be established by WRAP. Any waste soil/clay leaving site must be transferred to a suitably permitted facility for recovery or disposal, along with accompanying duty of care paperwork.

Please find further information relating to the duty of care code of practice here:

[Waste_duty_of_care_code_of_practice.pdf](#)

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Site operational status

As of the time of writing, the site is within the pre-operational phase of it's activities. During the call it was established that the operator is still awaiting planning permission from the local authority. An estimated timescale for the site becoming operational was give as within the next three months.

Action: Notify NRW when the site is to become operational.

W2A - Permitted activities**Table S1.1 activities**

Activity reference	Description of activities for waste operations	Limits of activities
A1 – Soil, soil substitutes and aggregates processing	<p>R13: 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>R3: Recycling/ reclamation of organic substances which are not used as solvents</p> <p>R5: Recycling/ reclamation of other inorganic compounds</p>	<p>All permitted waste 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"> - sorting and/or separation - screening - blending - bulking up <p>of permitted waste for the purpose of recovery only.</p> <p>Waste types as specified in Table S2.1.</p>

With reference to permit table S1.1 above, the site is permitted to conduct the following activities: Recovery of soil, soil substitutes and aggregates via recovery activities coded R3, R5 and R13 (limited to sorting and/or separation, screening, blending and bulking up). Crucially the wastes that the site is permitted to accept, store and process are limited to those listed within table S2.1 of the site permit. Any such wastes must be stored and treated on hardstanding, or on an impermeable surface with sealed drainage.

W2C - Operating techniques

Permit condition 2.3.1 (a) states: "The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by Natural Resources Wales."

Table S1.2 Operating techniques		
Description	Parts	Date Received
Technical Guidance Document: 'How to comply with your environmental permit'	All relevant sections	N/A
Sector Guidance Note IPPC S5.06: Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste	All relevant sections	N/A
Response to Schedule 5 Notice dated 11/08/25	Environmental Management System (document ref: TG Cefn Graianog Quarry EMS 2025 v4) Sections: <ul style="list-style-type: none"> - 1.5 Waste types and quantities - 2.7 Drainage - 2.8 Waste transfer and storage - 3.2 Waste acceptance procedure - Appendix 6 inspection schedule 	22/08/25
	Dust Management Plan (doc ref: K0642-ENV-R005-04 - Dust Management Plan) Sections: <ul style="list-style-type: none"> - All 	
	Environmental Risk Assessment (document ref: K0642-ENV-R002-04 - Environmental Risk Assessment Final) Sections: <ul style="list-style-type: none"> - Standard noise mitigation measures outlined in bullet points listed in 2.3.2 Noise and vibration 	

With reference to table S1.2 of the site permit, the site is required to conduct its operations within full compliance to all relevant sections, of the Technical Guidance Document: "*How to comply with your environmental permit*". NRW guidance: "*How to comply with your environmental permit*", can be found here: [How to comply with your environmental permit](#).

Furthermore the site permit also stipulates that the site's operations must be conducted within full compliance to all relevant sections of Sector Guidance Note *IPCC S5.06: Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste*. A copy of *Sector Guidance Note IPCC S5.06* can be found here: [waste BAT guidance.book](#).

Operator response to a Schedule 5 Notice, submitted to NRW on 22 August 2025 resulted in the following conditions being stipulated on the site's operating techniques, and within table S1.2 of the site permit:

The site is to accept a maximum of 50,000 tonnes of wastes listed within Appendix A of the site's EMS (identical to permit table S2.1) per year. As a result of conditions outlined within section 1.5 of the site EMS, permit table S1.2 also limits the site operations to a maximum of 1000 tonnes of waste is to be tipped at the site in a day, and limits the maximum volume of waste to be stored at the site at any time to 20,000 tonnes.

Section 2.7 of the site's EMS outlines, and therefore site permit table S1.2 stipulates that all waste treatment shall occur on hard standing and that no discharge of water shall occur from the site. Section 2.7 of the site EMS outlines that the site operates a "closed loop" drainage system.

Section 2.8 of the EMS and therefore permit table S1.2 limit site waste transfer and storage to the following conditions:

- That maximum storage height of stockpiles are limited to a maximum height of 5 meters.
- Maximum storage volume of waste is to be limited to 14,000 tonnes.
- Maximum storage volume of product is to be limited to 6,000 tonnes.
- A designated area for the deposit of unauthorised wastes (quarantine) area is to be allocated within the site.

Section 2.3.2 "*Noise and Vibration*" of the site's Environmental Risk Assessment outlines, and therefore permit table S1.2 stipulates that: dry processing will be limited to screening and associated handling of waste.

W2D - The site

Permit condition 2.2.1 states: "The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit."

With reference to the below image taken from schedule 7 of the site permit, the area shown edged in green is where storage of waste to be treated and blended to produce soil, soil substitutes and aggregates is permitted.



W2E - Waste acceptance

Permit condition 2.3.2 states: "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.

With reference to table S2.1 of the site permit below, all waste types that the site are permitted to accept are listed.

Table S2.1 Permitted waste types and quantities for soil, soil substitutes and aggregates production activity

Maximum quantity	The maximum quantity for waste to be accepted on site shall not exceed 50,000 tonnes per year.
Exclusions	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"> • consisting solely or mainly of dusts, powders or loose fibres • sludges or liquids • contaminated wastes • hazardous wastes
Waste code	Description
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS
01 04	Wastes from physical and chemical processing of non-metalliferous minerals
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	Waste sand and clays consisting of waste sand only
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	Concrete, Bricks, Tiles and Ceramics
17 01 01	Concrete excluding concrete slurry
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
17 03	Bituminous mixtures, coal tar and tarred products
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01
17 05	Soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	Soil and stones other than those mentioned in 17 05 03
17 05 06	Dredging spoil other than those mentioned in 17 05 05 consisting of inert dredgings only
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 02	Garden and park wastes (including cemetery waste)
20 02 02	Soil and stones

Mirror non-hazardous waste codes

Section 3.1.4 of the site EMS outlines the operator's policy for the sampling of mirror non-hazardous waste codes which are listed in Appendix 1 of the site EMS/table S2.1 of the site permit. Section 3.1.4 of the site's EMS outlines that mirror non-hazardous wastes sourced from potentially contaminated sites, chemical analysis and assessment will be undertaken, to ensure waste is non-hazardous prior to acceptance.

Waste acceptance procedure

Section 3.2.1 of the EMS outlines that the site operates three levels of waste acceptance, being:

1. Basic characterisation through pre-submission of an appropriate waste classification.
2. Compliance testing.
3. On site verification.

Section 3.2.2 to section 3.2.7 of the EMS outline in detail the site's waste characterisation (level 1) procedures.

Section 3.2.8 and section 3.2.9 of the EMS outline the site's compliance testing (level 2) procedures.

Section 3.2.10 to section 3.2.12 of the EMS outline the site's onsite verification (level 3) procedures.

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Waste rejection

It is noted that section 3.2.13 to section 3.2.17 of the EMS outlines the site's waste rejection procedures.

W3G - Fire

No condition requiring a Fire Prevention and Mitigation Plan (FPMP) is present within the site permit. Furthermore section 4.8.1 of the site EMS states: "*A Fire Prevention Plan is not required due to the waste types processed*". EMS sections 4.8.2 and 4.8.3 outlines that naked flames, smoking, and burning of wastes are not permitted within the site boundaries. Finally sections 4.8.4 to 4.8.5 outline the processes of dealing with a fire and outline that NRW will be contacted in the event of a fire.

W4A - Records

Permit condition 4.1.1 states: "All records required to be made by this permit 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 revival; and

(d) be retained, unless otherwise agreed in writing 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 the land and groundwater."

EMS section 2.4.2 states outlines all relevant records that the site will retain for a minimum of 6 years. These records will be made ready for inspection by NRW on request.

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 the waste

accepted and removed from it during the previous quarter."

As discussed during the initial meeting and within following correspondence, it was established that despite the site being pre-operational, and therefore, having not yet accepted any waste. Due to the site permit being active, the site is still required to submit quarterly waste returns in line with permit condition 4.2.2.

As a result the site has agreed to submit "nil" waste returns until the site becomes operational. It is noted that the site submitted it's waste returns for the first quarter of 2026 (1 January 2026 - 31 March 2026) on the 29 of April 2026. These are currently being processed 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 the permit; or any significant adverse environmental effects.

(c) any significant adverse environmental effects.

It is noted that EMS section 4.1.1 states: *"Any incidents involving the following will be reported to NRW as soon as is practicably possible either through a direct line or using the national 24 hour line where out of normal office hours.*

- 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 environmental permit.*
- any significant adverse environmental effects."*

Application of the above quoted procedure will assist the site in complying with permit condition 4.3.1 in the unfortunate event that notification of an incident is required.

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NRW would like to thank Kevin Gardiner and Huw Thomas for their time during our call and in all relevant correspondence.

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

ENDS

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Please find below relevant links to further guidance:

- Service to change to, or to vary a bespoke waste permit:
 - [Natural Resources Wales / Apply to change to, or vary, a bespoke waste permit](#)
- This 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 and Operational Risk Assessment (OPRA) spreadsheet:
 - [opra-v26-2026-27.xlsx](#)

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.