

## Compliance Assessment Report CAR\_NRW0051953

**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:** 20/04/2026 between 10:30 and 11:50.

**Parts of permit assessed:** Composting facility.

**NRW Lead Officer:** Daniel Packer.

**Report sent to:** Paul Wakelin, Head Of Operations, on 22/05/2026.

### 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	Action only (X)	
IR3I - Installations - Emissions and monitoring - Fire	Action only (X)	
IR3I - Installations - Emissions and monitoring - Fire	Action only (X)	
IR3I - Installations - Emissions and monitoring - Fire	Action only (X)	
IR2B - Installations - Operations - The site	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
IR3I	1. The operator must return the legacy green waste	12/06/2026

Criteria	Action needed	Complete by
	stockpile to compliance with the FPP. This includes improvement of the fire break arrangements within the legacy green waste stockpile. Fire breaks must be widened to an appropriate standard and maintained to ensure safe access for firefighting personnel. Stockpile sides must be stabilised to prevent collapse and ensure firefighter safety.	
IR3I	2. The operator shall review fire response procedures to account for the nature, scale, and compaction of the legacy green waste stockpile. This review must look into the provision for the use of wetting agents and consideration of the increased time and resources required to effectively control a fire.	12/06/2026
IR3I	3. The operator shall ensure that a suitable and reliable supply of water is available for firefighting purposes. Reliance on the leachate lagoon is not sufficient. Appropriate infrastructure must be implemented to allow effective use of alternative water sources located elsewhere on site.	12/06/2026
IR3I	4. The operator shall provide and maintain a quarantine area on the concrete pad that is compliant with the FPP and Fire Prevention and Management Plan (FPMP) guidance. The quarantine area must be equivalent to at least 50% of the volume of the largest waste stockpile on site and must be kept available for immediate use.	12/06/2026
IR2B	6. The operator shall review and improve the storage and management of waste wood on the IVC yard by: Reducing stockpile heights to safe and compliant levels; Installing and maintaining a designed containment freeboard; Preventing materials from exceeding or spilling beyond containment; Ensuring adequate separation distances between stockpiles and between stockpiles and buildings	12/06/2026

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.

**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

Purpose of Visit:

To undertake a joint inspection with Mid Wales Fire and Rescue Service (MWFRS) to obtain expert opinion on current operational arrangements, with particular focus on fire prevention, emergency response capability, and compliance with the Fire Prevention and Management Plan (FPMP) guidance.

### 1. Attendance

NRW – Senior Officer

Mid Wales Fire and Rescue Service (MWFRS): Station Manger & Incident Command Manager.

Cwm Environmental: Site Manager

Head of Operations

HSE Manager

### 2. Site Details

Visit Date: 20 April 2026

Check-in: 10:30 Check-out: 11:50

Weather Conditions: Warm and sunny

### 3. Summary of Findings

During the inspection, MWFRS provided specialist operational feedback regarding arrangements for fire prevention and firefighting, with particular emphasis on the legacy green waste stockpile and the site's preparedness to respond effectively to a fire incident. This report also contains details relating to other combustible materials contained within the permitted area.

### 4. Fire Breaks – Legacy Green Waste

MWFRS identified that the fire breaks within the legacy green waste stockpile are insufficient and would not allow for safe firefighting operations. Concerns included:

- Fire breaks observed to be between 1–2 metres in width.
- The steep sides of the legacy green waste stockpile, with signs of collapse in several areas.

Given these conditions, MWFRS stated that they would not deploy personnel into the fire breaks due to the risk of collapse and entrapment.

As a result, even though MWFRS advised that they believe the legacy green waste stockpile would be a low fire risk, they would treat the entire legacy green waste stockpile as a single, continuous

block in the event of a fire.



*Figure 1 - Legacy green waste stock pile, showing poorly formed fire breaks*



*Figure 2 Further photo of legacy green waste stock pile with poorly formed fire break*

In CAR\_NRW0051913 relating to a site inspection on 18 March 2026 the operator was scored a non-compliance for the legacy green waste stockpile and its non-compliance with the FPP and FPMP guidance. NRW considers the opinion of the MWFRS supports this assessment. However, due to the short time duration between this inspection and that on 18 March 2026 and the unreasonable expectation for the matter to have returned to compliance within that timeframe, a further score has not been recorded in this report.

The action in CAR\_NRW0051913 relating to returning the legacy green waste stockpile to compliance with the FPP remains relevant. The operator should note NRW is considering the use of

regulatory tools to ensure this is achieved.

#### 5. Fire-Fighting Media and Waste Compaction

MWFRS advised that, due to the scale and compaction of the legacy green waste stockpile, conventional water application alone would be ineffective, as it would not penetrate deeply enough into the waste mass. A wetting agent would be required to be mixed with firefighting water to improve effectiveness. This would substantially increase the time and resources needed to manage a fire.

#### 6. Availability of Fire-Fighting Water

MWFRS provided detailed advice regarding available water supplies.

The leachate lagoon near the composting area was deemed unsuitable for firefighting purposes. MWFRS confirmed that previous use of this lagoon during an incident at the MRF resulted in pump blockages due to contamination within the leachate. MWFRS advised they would ideally not use this lagoon again for firefighting and would use as a last resort where other options are available.

Water would need to be sourced from lagoons located at the bottom of the site, approximately 600 metres away. MWFRS estimated that it would take around one hour to lay pipework and establish a supply before firefighting could begin.

#### 7. Fire Hydrant Provision and Metering

MWFRS identified that a fire hydrant is located near the site weighbridge. While this hydrant could potentially be used for firefighting, infrastructure would need to be installed to enable water to be conveyed from the hydrant to the composting and waste storage areas.

MWFRS further advised the operator that a water meter bypass should be installed specifically for firefighting purposes. Without a bypass, the operator would be liable for significant water consumption charges in the event of a fire requiring prolonged hydrant use.

#### 8. Quarantine Area Provision

MWFRS provided some advice on the requirements of the Fire Prevention and Management Plan (FPMP) guidance and confirmed that a quarantine area must be provided on the concrete pad equivalent to 50% of the volume of the largest waste block on site.

The legacy green waste stockpile represents the largest waste block present.

At the time of inspection, the available free space on the concrete pad was insufficient to provide a quarantine area of the required size.

This would limit the operator's ability to isolate burning or high-risk material.

## 9.NRW Findings

### 9.1 Concrete Pad Layout and Surface Water Control

NRW discussed the current layout and operational use of the concrete composting pad with the operator.

The operator confirmed that the legacy green waste stockpile is currently situated on the northern side of the concrete pad. Active compost windrows and finished product are located on the southern side of the pad. The fall of the concrete pad runs from north to south.

### 9.2 Status of Legacy Green Waste Stockpile

NRW separately discussed with the operator concerns regarding the legacy green waste stockpile, noting: The material has remained on site for a prolonged period and there has been limited processing or use during this time.

NRW advised that, due to its longevity and limited use, NRW considers the material may constitute a waste rather than a process input.

### 9.3 Compliance History and Further Engagement

NRW advised the operator that several actions identified in previous CARs, as well as requirements under an issued Regulation 36 notice, remain outstanding or have not been complied with.

Given the cumulative compliance concerns identified during previous compliance visits and this visit with the additional advice from MWFRS, NRW requested that a further meeting be arranged with Cwm Environmental senior management in attendance.

### 9.4 Oversize Stockpile

NRW also noted during the inspection that the oversize material stockpile appeared to have increased in size since the previous site visit in March 2026.

NRW therefore has concern that the continued growth of this stockpile may indicate insufficient onward management or processing and a potential breach of storage and waste management controls.



*Figure 3 photo showing oversize stock pile*



*Figure 4 photo showing over size stock pile*

## 10.0 Wood Waste Storage.

During the site visit, Mid and West Wales Fire and Rescue Service concerns were raised regarding the large volume of storage of waste wood on the IVC yard.

At the time of the visit, NRW observed that:

- Waste wood was being stored at heights of at least approximately 6 metres;
- There was poor separation between individual waste wood piles and between the piles and the adjacent IVC building;
- Waste wood was stored within a concrete block containment area, however the intended 1 metre freeboard designed to limit pile heights was not present or had failed;
- The waste wood exceeded the height of the concrete blocks and, in some locations, material was observed to be spilling beyond the containment;
- The storage area is adjacent to an access route serving the IVC and HWRC, resulting in a higher potential risk of ignition due to frequent vehicle movements.



Figure 5 photo showing wood storage on ivc yard



Figure 6 photo showing wood storage on ivc yard



Figure 7 photo showing wood storage on ivc yard

Please note that NRW will be reviewing and sending a separate letter commenting on the latest FPP submission (*Fire Protection Plan / Fire Prevention and Mitigation Plan (FPMP), Version 1.8*, submitted by Cwm Environmental Ltd for the Nantycaws facility on 27 March 2026) in light of the comments raised by MWFRS.

The operator should also consider whether further updates are needed to version 1.8 of the FPP in light of the items discussed above.

#### 11. Actions

1. The operator must return the legacy green waste stockpile to compliance with the FPP. This includes improvement of the fire break arrangements within the legacy green waste stockpile. Fire breaks must be widened to an appropriate standard and maintained to ensure safe access for firefighting personnel. Stockpile sides must be stabilised to prevent collapse and ensure firefighter safety.

2. The operator shall review fire response procedures to account for the nature, scale, and compaction of the legacy green waste stockpile. This review must look into the provision for the use of wetting agents and consideration of the increased time and resources required to effectively control a fire.

3. The operator shall ensure that a suitable and reliable supply of water is available for firefighting purposes. Reliance on the leachate lagoon is not sufficient. Appropriate infrastructure must be implemented to allow effective use of alternative water sources located elsewhere on site.

4. The operator shall provide and maintain a quarantine area on the concrete pad that is compliant with the FPP and Fire Prevention and Management Plan (FPMP) guidance. The quarantine area must be equivalent to at least 50% of the volume of the largest waste stockpile on site and must be kept available for immediate use.

5. The operator shall review and improve the storage and management of waste wood on the IVC yard by:

Reducing stockpile heights to safe and compliant levels;

Installing and maintaining a designed containment freeboard;

Preventing materials from exceeding or spilling beyond containment;

Ensuring adequate separation distances between stockpiles and between stockpiles and buildings

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](mailto: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](mailto: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.