

Compliance Assessment Report CAR_NRW0051996

Permit being assessed: VP3798FJ.

For: Old Sawmills Waste Transfer Station With Treatment & Recycling Facility, **held by:** All Waste Services Ltd

At: Llangadog, Carmarthenshire, SA19 9LS.

Type of assessment: Site Inspection,

Reason: Routine.

On: 27/05/2026 between 13:15 and 14:45.

Parts of permit assessed: W1A, W2A, W2D, W4B.

NRW Lead Officer: Alex Underhill.

Report sent to: Hefin Roberts, Director, on 01/06/2026.

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	C3 Minor	1.1.4
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W4B - Waste - Information - Reporting	C4 No impact	4.2.2

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

Total non-compliances recorded	Total non-compliance score
2	4.1

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	The operator shall comply with the requirements of an approved competence scheme - TCM continual competence training needs to be completed and certified.	28/08/2026
W4B	Waste Return Notes have to be submitted to NRW within 1	28/08/2026

Criteria	Action needed	Complete by
	month of the reporting period finishing. Please ensure all outstanding periods are submitted.	

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

This was an unannounced site visit made by Alex Underhill of Natural Resources Wales (NRW). The purpose of the inspection was to assess compliance against the tier 3 bespoke Environmental Permit EPR-VP3798FJ.

The weather was hot with strong sunshine.

Previous inspection:

No permit breaches were observed during the last inspection dated 14/09/2023. Please see Compliance Assessment Report CAR_NRW0042474 for further details.

Permit Breaches:

2 permit breaches were recorded during this inspection.

1) General Management (W1A) - Permit Condition 1.1.4 – C3 breach

Under **condition 1.1.4** of your permit, “The operator shall comply with the requirements of an approved competence scheme.”

Director’s TCM certification had not completed the latest continued competency test, this needs to be valid and up to date to ensure compliance.

Action – You must ensure that the TCM holds an approved competency certification, and the continual competence is routinely completed. The continual competence test is expected to be at booked within 3 months.

2) Reporting (W4B) - Permit Condition 3.4.1 – C4 breach

Under **condition 3.4.1** of your permit, “Within one month of the end of each quarter, the operator shall submit to the Environment Agency 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.”

Waste Transfer Notes were readily available on-site, however NRW systems shows that transfer notes have not been submitted to NRW this year.

Actions – You must ensure that all outstanding Waste Return notes are submitted to NRW within 3 months.

General observations:

The site was generally clean and well organised with good segregation of waste types and good waste storage practices were observed. There was a pile of waste to be sorted through, please ensure this is sorted and cleared, when possible, to minimise the risk of fire. Despite the hot weather, there was no evidence of pests or odour.

General Management (W1A): (1 C3 Breach)

The site is required to be operated in accordance with a written management system that identifies and minimises risks of pollution. Director's TCM certification had not completed the latest continued competency test, this needs to be kept on top of to ensure compliance. An independent consultant can be spoken to to get more information about the Continual Competency requirements of the TCM certification.

Permitted Activities (W2A):

Waste areas are all kept separate, and all waste on site is included in the permitted activities of Schedule S1.1 and S2.1 of the permit.

The Site (W2D):

Site was generally clean and well organised. All specified waste sections were kept separate. Drainage goes to soakaway at the end of the site, no issues with pooling water.

Reporting (W4B): (1 C4 Breach)

Waste Transfer Notes were readily available on-site, however NRW systems shows that transfer notes have not been submitted to NRW this year. The permit requires reports to be submitted within one month from the end of each quarter, please ensure all outstanding transfer note reports are submitted to NRW. If you need assistance in submitting, an independent consultant can be spoken with to assist you with this.

Technical competence:

TCM for the site holds the appropriate WAMITAB certification. However, the Continuing Competence certificate has expired and needs to be completed. It was suggested that the Director's son may look to complete the TCM training in the future.

Many thanks for your time during the inspection.

Ends.

In this document ‘Natural Resources Wales’ means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order 2012.

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.