

Compliance Assessment Report CAR_NRW0050147

Permit being assessed: CB3491FL.

For: AST Plastic Containers UK LLP, **held by:** AST Plastic Containers UK LLP

At: Unit 1, Abbey Road, Redwither Business Park, Wrexham, Wrexham, LL13 9RF.

Type of assessment: Site Inspection,

Reason: Routine.

On: 15/05/2026 between 10:15 and 12:10.

Parts of permit assessed: 1.1.1.

NRW Lead Officer: Ian Thomas2.

Report sent to: Shaun Nichols, site manager, 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
W2D - Waste - Operations - The site	C3 Minor	EMS 2.6 site security
W2A - Waste - Operations - Permitted activities	C3 Minor	Permit table S1.1
W2D - Waste - Operations - The site	Action only (X)	
W2A - Waste - Operations - Permitted activities	C3 Minor	EMS table 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
W2D	Review of security measures	30/06/2026
W2A	No storage of waste is permitted on the exterior of the site	30/06/2026
W2D	Remove any obstructions from essential fire exits	30/06/2026
W2A	Reduce storage heights	30/06/2026

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.

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

On Friday the 15th May 2026 Natural Resources Wales officers attended site.

This was a routine site inspection for permit ref EPR/CB3491FL which was carried out by Waste Regulation Officer Ian Thomas.

On arrival at site, It was noted that new fencing and gates has been completed, separating the permitted site from the neighbouring business which has applied for it's own permit. The NRW officer attempted to access the site via the reception entrance, this was locked. Having previously visited the site, the alternative entrance was used, however this entrance was unlocked and the security system on the door disabled. NRW officer Ian Thomas signed in the visitor log and entered the office area, Ian made himself known to a member of staff. The person indicated they were on a phone call, I. Thomas waited. As the NRW officer had full PPE and was aware of the site layout, he conducted part of the site inspection. The full exterior for the permitted site was walked, at no time was he engaged by any staff member. The officer was able to access the warehouse and machinery line, again without any questioning by any member of staff. Photos were taken of the site and the internal warehousing area.



Access to warehouse area

Upon returning to the office area, there were no staff present. I. Thomas left a notice on a desk inside the previously occupied office and left the site. Shortly after leaving, Poppy Murphu, TCM for the site rang and asked I. Thomas to return to site, which he did. Poppy apologised for the lack of availability. I. Thomas explained he understood and wherever possible NRW officers will always work around the business, but in this instance all staff failed to engage with a visitor and the security for the site was not suitable. I. Thomas was able to access the full site without any questions by staff, any machinery could have been tampered with, to the extent that the officer could have walked out with a laptop computer and documents relating to the business.

EMS AST Plastic

2.6 Site security

2.6.1 The site's security measures are shown on Drawing No. ABB/2789/03 and considered suitable to prevent unauthorised vehicular or pedestrian access. It must be noted that operations in the building will be taking place 24/7 so there will always been staff present to prevent any risk of arson occurring.

2.6.2 The site will benefit from 24-hour security with remotely accessible CCTV fitted with full site coverage and off-site supervision. The CCTV has been installed by ADT Security Services who also maintain and act as the third-party monitoring company CMS Security who will view any footage in the event an alarm and notify the site manager / TCM in any incidents. ADT Security Services UKAS accredited and provide a response time to any incident within 42 seconds which is the fastest in the industry.

2.6.3 The site security measures will be inspected on a daily basis and any defects which impair the effectiveness of the security will be repaired as soon as practicable. If this is not

possible, temporary measures will be put in place to ensure no unauthorised access to the site can be gained until the proper repairs can be carried out.

2.6.4 If unauthorised access becomes apparent as a problem at the site the security measures will be reviewed and improvements implemented

This breach has been scored as a C3

Whilst carrying out the remainder of the inspection accompanied by Poppy, some problems were highlighted in accordance with the permit conditions.

The exterior of the site has been reduced in size due to an agreed lease to another company. And although some of the waste plastic stored outside apparently arrived that day, there is far more and have been in storage outside for some time. The amount of waste plastic storage outside of the warehouse cannot physically be stored inside the warehouse building as required under the permit conditions.



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.