

Compliance Assessment Report CAR_NRW0051552

Permit being assessed: BB3990ZX.

For: Mobile Plant, **held by:** Beacon Foods Limited

At: .

Type of assessment: Report/Data Review,

Reason: Routine.

On: 17/04/2026.

Parts of permit assessed: Spreading records.

NRW Lead Officer: Alder Tye.

Report sent to: Paul Davies, TCM, on 08/06/2026.

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	Action only (X)	
W2A - Waste - Operations - Permitted activities	C4 No impact	2.1.5
W4B - Waste - Information - Reporting	C4 No impact	4.2.2
W4A - Waste - Information - Records	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
2	0.2

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	Submit the version(s) of your Environmental Management System in use over the period of this deployment	22/05/2026
W2A	Ensure you comply with the conditions of your permit and deployment	22/05/2026
W4B	Re-submit waste returns to document the acceptance of	22/05/2026

Criteria	Action needed	Complete by
	waste code 020301 and ensure waste returns are completed correctly	
W4A	Submit copies of the Waste transfer Notes for all wastes accepted	22/05/2026

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.

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

This CAR was originally issued on 17.04.26. Following the issuing of your report, and in light of the explanation and evidence you provided to NRW on 08.05.26, it has been accepted that the discrepancies in your waste returns and spreading records were due to an administrative error. This still constitutes a breach, as the records were reported incorrectly and did not comply with permit conditions at the time. However, the non-compliance has been reclassified as Category 4, as it is not considered to have any foreseeable impact on the environment, people, or property.

This was a routine review of data undertaken by Alder Tye (Waste Regulation Officer) to assess your spreading records for all spreading activities in 2025. The records were submitted on 06 January 2026 following a request from NRW to submit the records.

The only deployment approved by Natural Resources Wales for you to spread under in 2025 was PAN-029757, which was approved on 08 August 2025 with an end date of 07 August 2026.

Permit Breaches

W2A – Permitted Activities - Category 4 - Permit Condition 2.1.5

You have been given this Category 4 breach under the above permit condition because spreading records submitted on 06 January 2026 show waste types that have not been approved as as part of the PAN-029757 deployment.

Failing to report waste streams received and spread correctly may result in a minor pollution of the

environment as you are not able to demonstrate that you have complied with the conditions of your deployment and permit- these conditions are written to be environmentally protective.

Action: Ensure you comply with the conditions of your permit and deployment with **immediate effect**.

W4B - Reporting - Category 4 - Permit Condition 4.2.2

You have been given this Category 4 breach under the above permit condition because your quarterly return for July-September 2025 did not include all waste codes detailed in your spreading records submitted on 06 January 2026.

Failing to report waste streams received and spread to land correctly may result in a minor pollution of the environment as you are not able to demonstrate that you have complied with the conditions of your deployment and permit- these conditions are written to be environmentally protective.

Additionally in the Q3 2025 waste return the information has been reported incorrectly. The company has completed the 'Wastes Removed' section, however there is no waste removed. The materials you have spread has been received under this permit and must be recorded under 'Waste Received'.

Action: Re-submit waste returns for July - September 2025 and ensure waste returns are completed correctly **by 22 May 2026**

Action: Submit copies of the Waste transfer Notes for all wastes accepted to be spread under this permit **by 22 May 2026**

Other Matters

W1A - General Management – Action Only - Permit Condition 1.1.1.

Permit condition 1.1.1 requires you to operate in accordance with a written management system that prevents, or minimises, harm to the environment. Your management system is key for assessing how effectively you are protecting the environment and to help improve how you manage the environmental risks from your activities. When a non-compliance with a permit condition is identified, it is likely to be the symptom of an underlying issue, often a failure to train staff properly, maintain plant or have effective operational procedures.

To identify the root cause of the permit breaches identified above, I need to review your Environmental Management System. Compliance against permit condition 1.1.1 will be assessed on

a subsequent compliance report.

Action: Submit the version of your Environmental Management System in use over the period of this deployment **by 22 May 2026**

W4A – Spreading Records – Assessed. Permit Condition 2.1.6

Spreading records submitted for 2025 have been assessed and contain sufficient information to assess your spreading activities against approved deployment PAN-029757.

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.