

Compliance Assessment Report CAR_NRW0051649

Permit being assessed: BB3794ZH.

For: Ty Mawr West Recycling, **held by:** Ty Mawr West Recycling Limited

At: Ty Mawr West Quarry, Talysarn, LL54 6BA.

Type of assessment: Site Inspection,

Reason: Routine.

On: 30/03/2026 between 09:40 and 11:05.

Parts of permit assessed: As below.

NRW Lead Officer: Leon Williams.

Report sent to: Ellis Wyn Jones, Company Director, on 03/06/2026.

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	1.1.1(a)
W1A - Waste - Management - General management	Action only (X)	
W2A - Waste - Operations - Permitted activities	C3 Minor	Table S1.1
W2D - Waste - Operations - The site	C3 Minor	2.2.1
W4A - Waste - Information - Records	Assessed (A)	

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
W1A	Waste should be stored for no longer than 6 months as defined by section 1.7.4 of the site Environmental Management System (EMS).	31/03/2027

Criteria	Action needed	Complete by
W1A	Further amend "SECONDARY AGGREGATES PROTOCOL, Ty Mawr West Quarry, Talysarn, Gwynedd LL54 6BA" with recommendations outlined below.	31/07/2026
W2A	Ensure that all wastes are stored and treated on visible and maintained hardstanding areas.	31/03/2027
W2D	Remove and process all waste currently stored outside the site's permitted boundary. All subsequent treatment and storage of segregated waste must take place within the permitted boundary and on appropriate hardstanding. Segregate all mechanically processed soils into a clearly defined stockpile within the permitted site boundary.	31/03/2027

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

Routine site inspection conducted by Senior Waste Regulation Officer Leon Williams on the 30 March 2026.

NRW were accompanied throughout the visit by Ty Mawr West Recycling Limited Director Ellis Wyn Jones.

The weather was dry and overcast during the inspection.

W1A - General Management

Permit condition 1.1.1 - The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises 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.

The primary focus of this inspection was to determine whether Ty Mawr West Recycling Limited had complied with the requirements of the Regulation 36 Environmental Permitting Regulations 2010 enforcement notice issued to the company on the 6 March 2025.

The Regulation 36 Environmental Permitting Regulations 2010 enforcement notice required Ty Mawr West Recycling Limited to reduce waste volumes at the site by 25,000 tonnes by the 31 March 2026 as current waste storage practices had exceeded storage times and volumes defined in Ty Mawr West Recycling Limited's Environmental Management System (EMS) as follows:

Table 1.2 Waste Storage Details

Description	Limits	Comments
Maximum storage time	Material will be stored for no longer than 6 months following extraction / acceptance.	The site is operated in accordance with a first-in-first-out principal, waste that has been excavated first will be the first to be removed off site.
Maximum storage capacity	No more than 10,000 tonnes of material will be stored on site at any one time.	This will be implemented through strict waste acceptance procedures.
Maximum stockpile height	Material will be stockpiled to a maximum height of 10m.	This will be implemented by visually monitoring the height of the stockpile

A visual inspection confirmed that the former extensive stockpile located within the permitted site boundary had been significantly reduced at the time of the site visit resulting in the creation of a clear area which can now be utilised for further waste storage and treatment activities.



Further review of documentation provided by Ty Mawr Recycling Limited confirms that 26,703 tonnes of waste were recovered and removed from the site between April 2025 and March 2026.

As a result, the requirements of the Regulation 36 Environmental Permitting Regulations 2010 enforcement notice have been met.

NRW acknowledges the considerable effort and corrective actions taken by Ty Mawr West Recycling Limited to move the site towards compliance with its environmental permit.

NRW now requires the operator to focus on addressing the waste stockpile located outside the existing site boundary, as referenced below.

W2A Permitted Activities and W2D - The Site

Permit condition 2.2.1 - 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.

Permit condition Table S1.1 - All wastes may be stored and treated on hardstanding.

A substantial stockpile of mixed inert waste and soils remains stored to the south of the site outside the currently permitted boundary. The permitted boundary is shown in schedule 7 of environmental permit BB3794ZH.



This stockpile has been present for a prolonged period and exceeds the maximum storage duration of six months as set out in Section 1.7.4 of the site's Environmental Management System (EMS).

The waste is also not stored on a visible hardstanding area which is a requirement under permit condition Table S1.1

NRW anticipates that the stockpile will require further screening to separate inert materials suitable for processing as recycled aggregate, in accordance with the WRAP Quality Protocol.

NRW requires Ty Mawr West Recycling Limited to prioritise the processing of this stockpile over the next 12 months. With waste volumes now having been reduced within the permitted site boundary, all treatment and storage activities associated with this stockpile must be undertaken within that permitted area.

It is also anticipated that screening of this stockpile will generate a surplus of soil-type residues. As no end-of-waste criteria exist for processed soils these materials must be disposed of or recovered off-site at a suitably permitted facility authorised to accept such waste. This may include facilities operating under an appropriate environmental permit or exemption.

This requirement is also referenced in Section 3.8.5 of the site EMS: *“Mechanically processed soil – As there is no end-of-waste status for mechanically processed soil, each*

load of processed soil arising from screening and leaving the site must be accompanied by a waste transfer note containing all required details. Such material will be sent to a suitably permitted or exempt facility for disposal or recovery.”

If Ty Mawr West Recycling Limited require further guidance regarding the off-site transfer of mechanically processed soils, please contact NRW for further advice.

CCS Category 3 scores have been recorded against permit conditions 1.1.1(a) and 2.2.1 in response to the storage time exceedances and waste stored outside the sites permitted boundary.

A further CCS Category 3 score has been recorded against permit condition Table 1.1. as the waste located to the south of the permitted boundary is not being stored on a clearly defined and properly maintained hardstanding area.

ACTIONS:

1) Remove and process all waste currently stored outside the site’s permitted boundary by the 31 March 2027. All subsequent treatment and storage of segregated waste must take place within the permitted boundary and on appropriate hardstanding.

2) Segregate all mechanically processed soils into a clearly defined stockpile within the permitted site boundary. If the operator is unclear about appropriate off-site recovery or disposal options for this waste stream, NRW should be contacted for further guidance.

W1A - General Management

WRAP Quality Protocol

On the 31 March 2026, NRW received via email a document titled "SECONDARY AGGREGATES PROTOCOL, Ty Mawr West Quarry, Talysarn, Gwynedd LL54 6BA".

It is understood that this document represents Ty Mawr West Recycling Limited’s version of a Factory Production Control (FPC) document, which is required to demonstrate compliance with the WRAP quality protocol framework that enables inert waste to achieve end-of-waste status. For the purposes of this report, we refer to it as an FPC.

The guidance document relating to the WRAP Quality Protocol can be found 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](#)

Section B2.0 of the document states that a “Factory Production Control (FPC) is required to include the following quality management requirements set out below”.

NRW have identified and summarised some procedural gaps in your FPC document under the following headings:

B2.1 General points about the procedures

- A specific management representative is not nominated in the current FPC as responsible for ensuring the FPC is implemented.
- Controls on sub-contractors are not defined.

B2.2 Waste acceptance criteria

- A procedure for dealing with non-conforming incoming waste must be developed for example, rejection of loads, quarantine or disposal. Records must be kept of how the procedure has been implemented. The current FPC does not have a procedure to cover this requirement and should be expanded under Section 2.4 of the FPC.

B2.3 Production and testing

The FPC document must be amended to include procedures which define:

- How processing equipment is maintained and adjusted during production.
- How input materials must be stocked in a controlled manner in clearly identified locations.
- How material taken from stock for processing must be checked for deterioration.
- How the finished product must be identifiable up to the point of sale.
- Procedures to maintain the quality of the product during handling, storage, transport and delivery.
- Procedures for the use, control, calibration and maintenance of inspection, measuring and test equipment must be setup and followed.

B2.4 Training

The FPC document must also specify how all personnel must be trained on matters including:

- acceptance criteria;
- procedures for non-compliant input wastes and output products;
- sampling;
- testing;
- and – inspection.

ACTION: Please review the recommendations outlined above and update the Factory Production Control (FPC) document accordingly. The revised FPC must be submitted to NRW for review no later than 31 July 2026.

Diolch yn fawr.

"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".

ENDS

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.