

Compliance Assessment Report CAR_NRW0052059

Permit being assessed: PP3993VS.

For: Atlantic Recycling Limited, **held by:** Atlantic Recycling Limited

At: Rumney, Cardiff, Glamorgan, CF3 2EJ.

Type of assessment: Site Inspection,

Reason: Routine.

On: 07/05/2026 between 10:00 and 12:00.

Parts of permit assessed: Waste acceptance.

NRW Lead Officer: Lewis Evans.

Report sent to: Site Manager, Site Manager, 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
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR4B - Installations - Information - Reporting	Action only (X)	
IR4A - Installations - 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	8

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
IR1A	Implement training to admin and weighbridge staff	Already completed
IR1A	Implemented senior management oversight of tonnage data	Already completed
IR4B	Action: Please submit to NRW the waste transfer notes of the	18/06/2026

Criteria	Action needed	Complete by
	burnt waste to confirm its destination and EWC by the 18th of June 2026.	
IR4A	Action: Please submit to NRW the waste transfer notes of the healthcare/ SRF waste material that was removed from site to confirm its destination by the 18th of June 2026.	18/06/2026

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

Latest CAR Actions (CAR NRW0050860)

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A response from the operator was sent on the 4th of June for the following actions.

- **Action:** Please provide a root cause of the acceptance of non-complaint wastes and what measures you will have in place to prevent this in the future by the 30th of April 2026 30/04/2026.

Atlantic Recycling (ARL) have acknowledged the issues identified in the incorrect waste codes being inputted into quarter 1 and 2 of the waste returns. Following an internal review, ARL can confirm that the waste codes were incorrectly selected by the administrative team at the point of booking. The waste codes were in face 170302 and 200301, which are listed in Schedule 2 of the permit. The root cause was a failure within the verification process which allowed the incorrect EWC codes to be entered; these subsequently carried through to the waste returns without being identified. Since the breach, ARL have implemented a secondary verification process whereby waste codes used are subject to review against the permit before the return is submitted; any waste codes not listed within the permit, will generate a management review. Additionally, ARL have briefed and retrained the relevant administrative and weighbridge staff on correct classification, as well as having reinforced management oversight of the waste returns.

ARL have proposed to submit the amended waste returns to NRW to provide full transparency and accuracy for the regulatory record. As mentioned in the CAR response document, an email will be sent to the operators following this CAR with instructions on who to email.

Action Complete.

Action: Please provide a root cause of the management of waste tonnages on site and why the site has accepted more waste than it is permitted to by the 30th of April 2026.

ARL acknowledge the exceedance of permitted waste tonnage limits during 2025. The root cause of the exceedance was identified to relate to an error in the forecasting process ARL use to determine

levels against the permit. Specifically, when calculating the total tonnages available for Quarter 4 2025, Quarter 4 2024 data was mistakenly used instead of Quarter 1 2025 data. As Q4 2024 volumes were significantly lower than Q1 2025, this resulted in an underestimation of the cumulative tonnage already accepted within the rolling annual period. As a result of this the forecast model had overstated the available capacity which meant that the site had accepted more waste onto site than they are permitted.

In response, Atlantic has implemented, or is in the process of implementing, the following measures:

- Review and correction of the forecasting for 2026.
- Increased senior management oversight of both forecast and actual tonnage data; and
- Targeted training for relevant staff to ensure correct data selection and understanding of rolling annual calculations.

Root Cause Non-Compliance

Permit condition 1.1.1 states:

“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.

From the response ARL have provided it shows that there was lack of training for the administrative and weighbridge staff on waste classification, which meant the proper checks were not completed and the waste was inputted incorrectly into the system. Additionally, ARL didn't have secondary checks in place to ensure the inputted waste codes were correct.

The non-compliances to the management system were a result of the processing and forecasting errors. Atlantic acknowledges that existing systems were not sufficiently robust to identify discrepancies prior to submission. The corrective and preventative measures implemented will significantly strengthen compliance assurance and reduce the likelihood of recurrence.

As a result a **category 3** non-compliance will be scored for each of the non-compliances that were found in CAR_NRW0050860.

FPMP

An updated Fire Prevention Management Plan (FPMP) will be prepared by site and will be submitted to NRW as soon as it is ready. However, this does not remove the operator's obligation to comply with permit condition 3.7. The operator must ensure that fire risks are appropriately identified, managed and controlled in line with current guidance and an effective fire prevention plan without delay. The revised FPMP should fully reflect current site operations and address the deficiencies identified during the inspection.

It was identified during the site visit that the current FPMP (v8) is not reflective of the activities that take place on site. The document contains references to activities that are no longer undertaken on site and includes details relating to baled waste, which is not processed or stored at this facility. This raises concerns regarding the accuracy, ownership, and ongoing management of the FPMP and indicates that it has not been adequately reviewed or maintained in line with operational changes.

Furthermore, during discussions with site directors following the walkover, significant shortcomings were highlighted within Table 2 of the FPMP (“ARL Site Maximum Storage Times of Waste”). Specifically, the waste stream described as “*Part Processed General Mixed Waste*” is assigned a storage duration of “*unspecified*”. All waste streams must have clearly defined maximum storage times that are justified, risk-based, and in line with fire prevention guidance.

In addition, there is currently no clear definition or description within the FPMP of what constitutes “part processed general mixed waste”. This lack of clarity presents a risk to effective waste management and fire prevention controls on site.

The operator is reminded that the FPMP is a critical control document and, in accordance with permit condition 3.7, must accurately reflect site activities and be implemented in practice at all times. The absence of an up-to-date and operationally relevant FPMP does not remove the requirement to appropriately identify, manage and minimise fire risks. Failure to ensure this may result in further regulatory scrutiny.

An updated FPMP should be prepared and submitted to Natural Resources Wales as soon as practicable. The revised document must fully reflect current site operations and address the deficiencies identified during the inspection. It will be subject to review upon submission, and any remaining deficiencies may require further revision.

Site Walkover

A site walkover was undertaken, during which it was observed that works have commenced on the installation of a new oil interceptor and associated water treatment plant. The operator must ensure that these works are carried out in accordance with relevant permits, design specifications, and environmental controls, and do not give rise to pollution risks during construction and commissioning.





It was also confirmed that the area previously used for the storage of healthcare waste has been completely cleared, with all such waste removed from site. At the time of the inspection, only relatively small stockpiles of waste were present on site. These included hard plastics, wood, shrubs, and incoming waste awaiting processing through the Materials Recovery Facility (MRF).

Action: Please submit to NRW the waste transfer notes of the healthcare/ SRF waste material that was removed from site to confirm its destination by the 18th of June 2026.

Field 2 has undergone some changes since the previous visit. It appeared that soil processing activities are being undertaken within this area; however, no such activities were observed at the time of the inspection.

Field 1 has been significantly cleared since the last inspection, which represents notable progress. At the time of the visit, there were four stockpiles of waste present within the field. These included smaller stockpiles that appeared to be prepared for onward transfer to Worthyhedge Landfill. Heights and widths of the stockpiles were not measured during the visit, however they appeared to be lower than previous visits. The operator should ensure that all such waste movements are appropriately documented and that storage durations remain compliant with relevant limits.



The burnt waste that had previously been brought onto site was observed to be located centrally within the field, with a large surrounding area left clear. The director indicated that this material is intended to be sent for incineration. The operator must ensure that this waste is removed from site in a timely manner and managed in accordance with all relevant regulatory requirements.



Action: Please submit to NRW the waste transfer notes of the burnt waste to confirm its destination and EWC by the 18th of June 2026.

END.

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

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.