

Compliance Assessment Report CAR_NRW0052071

Permit being assessed: CB3791ZU.

For: Mobile Plant, **held by:** Evan Williams

At: .

Type of assessment: Report/Data Review,

Reason: Routine.

On: 10/06/2026.

Parts of permit assessed: As below. .

NRW Lead Officer: Cheryl Griffiths.

Report sent to: Evan Williams, The operator., on 15/06/2026.

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	Action only (X)	
W4A - Waste - Information - Records	Action only (X)	
W4B - Waste - Information - Reporting	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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 a copy of the current and valid Technically Competent Manager (TCM) certificate to NRW.	29/06/2026
W2A	Provide a written explanation to NRW outlining the current status of the waste held on site. This explanation must include: Confirmation that no waste has been stored beyond	29/06/2026

Criteria	Action needed	Complete by
	the 12-month limit, and details of any waste that has been removed from the site, including dates of removal and destination facilities.	
W4A	Provide confirmation of the specific local authority area(s) from which the waste received at the site originated. Where this information is not available, provide a written explanation outlining why the local authority cannot be identified, and justify the use of "Wales" as a last resort entry.	29/06/2026
W4B	Continue submitting quarterly waste returns within one month of the end of each quarter.	31/08/2026

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

A review of the 2026 quarterly waste return submitted for permit CB3791ZU has been completed. This review was undertaken in accordance with the permit conditions outlined below.

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W1A - General Management

Permit condition 1.1.2 states that *"records demonstrating compliance with rule 1.1.1 shall be maintained."*

This places an obligation on the operator to ensure that appropriate documentation is retained and readily available to demonstrate compliance with the overarching management requirements of the permit.

In addition, permit condition 1.1.1(b) requires that *"the operator shall manage and operate the activities using sufficient competent persons and resources."*

This includes ensuring that personnel fulfilling key roles, such as the Technical

Competence Manager (TCM), hold valid and up-to-date certification.

On 10 June 2026, Natural Resources Wales (NRW) undertook a review of the waste return submitted for the first quarter of 2026. As part of this review, NRW records were checked to confirm that all relevant competency documentation is held on file. It was identified that NRW currently does not hold a copy of the TCM certificate for this permitted activity.

Maintaining an up-to-date record of competency certification is essential to demonstrate ongoing compliance with permit conditions relating to technical competence and management arrangements.

ACTION: *The operator is required to submit a copy of the current and valid Technically Competent Manager (TCM) certificate to NRW no later than 29 June 2026.*

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W2A - Permitted activity

Permit condition 2.1.1 states that “the operator is only authorised to carry out the activities specified in table 2.1 below (‘the activities’).” In accordance with Table 2.1, waste accepted at the site must not be stored for longer than 12 months.

Natural Resources Wales (NRW) has undertaken a review of the quarterly waste returns submitted from January 2025 to date. The information provided indicates the following:

2026

- **Quarter 1 (January – March 2026):** 1,274.48 tonnes of waste coded 19 05 99 were received. No waste removals were recorded during this period.

2025

- **Quarter 1 (January – March 2025):** 1,013.66 tonnes of waste coded 19 05 99 were received. No waste removals were recorded.
- **Quarter 2 (April – June 2025):** No waste was received and no waste was removed.
- **Quarter 3 (July – September 2025):** No waste was received and no waste was removed.
- **Quarter 4 (October – December 2025):** 2,856 tonnes of waste coded 19 05 99 were received. No waste removals were recorded.

Based on the data reviewed, a total of 5,144.14 tonnes of waste coded 19 05 99 has been accepted under permit CB3791ZU since January 2025, with no recorded removal of waste from the site during this period.

Given the permit requirement that waste must not be stored for longer than 12 months, the absence of recorded removals raises concerns regarding potential non-compliance with the permitted storage time limits.

ACTIONS: *To demonstrate compliance with the storage requirements of the permit, the operator is required to provide a written explanation to NRW outlining the*

current status of the waste held on site. This explanation must include:

- **Confirmation that no waste has been stored beyond the 12-month limit, and**
- **Details of any waste that has been removed from the site, including dates of removal and destination facilities.**

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W4A - Records

Permit condition 4.1.1(a) states that “All records required to be made by these standard rules shall: (a) be legible.”

This requirement extends to ensuring that records are not only readable, but also sufficiently detailed and accurate to allow effective regulatory review.

During the review of the quarterly waste returns received, NRW officers identified that the “Local Authority area where the waste arose” field has been recorded as “Wales.”

As outlined in the guidance note embedded within the waste returns template, operators are required to select the local authority area of origin for the waste using the dropdown options provided. The use of a broader geographical descriptor, such as a country, should only be used as a last resort, and only where more precise information is genuinely unavailable.

Recording only “Wales” limits NRW’s ability to effectively monitor waste movements and assess compliance, as it does not provide sufficient geographic specificity.

ACTIONS: NRW requires the operator to:

- **Provide confirmation of the specific local authority area(s) from which the waste received at the site originated;**
- **Where this information is not available, provide a written explanation outlining why the local authority cannot be identified, and justify the use of “Wales” as a last resort entry.**

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W4B - Reporting

Permit condition 4.2.2 states that “within one month of the end of each quarter, the operator shall submit to Natural Resources Wales, 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.”

This requirement ensures that NRW receives timely and accurate data to monitor compliance and environmental performance.

On 10 June 2026, NRW officers reviewed the waste return submitted for the first quarter of 2026. The submission was assessed against the reporting requirements set out in the

permit condition.

Following this review, NRW can confirm that the waste return was submitted within the one month of the first quarter in 2026

Continued compliance with reporting requirements is essential to demonstrate effective site management and regulatory adherence.

ACTION: *The operator is required to continue submitting quarterly waste returns within one month of the end of each quarter, in accordance with permit condition 4.2.2.*

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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.