

Compliance Assessment Report CAR_NRW0052156

Permit being assessed: PP3430UL.

For: Bridgend Clinical Waste Treatment Plant and Transfer Station, **held by:** SRCL Limited

At: S R C L Ltd, Unit 12, Aneurin Bevan Avenue, Brynmenyn Industrial Estate, Brynmenyn, Bridgend, Bridgend, CF32 9SZ.

Type of assessment: Site Inspection,

Reason: Routine.

On: 11/06/2026 between 10:30 and 12:30.

Parts of permit assessed: Various.

NRW Lead Officer: Greg Gardner, accompanied by Lewis Evans.

Report sent to: Site Compliance Manager, Site Compliance Manager, on 25/06/2026.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3I - Installations - Emissions and monitoring - Fire	Action only (X)	
IR4B - Installations - Information - Reporting	Action only (X)	
IR4A - Installations - Information - Records	Action only (X)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR3D - Installations - Emissions and monitoring - Noise and vibration	Assessed (A)	

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
IR3I	Review and update sites FPMP document in relation to fire breaks / bin storage area(s). Once updated, please send revised FPMP to your regulating Officer for review.	31/07/2026
IR4B	Resubmit all outstanding waste returns to NRW on NRW provided waste return document to ensure all the data is submitted correctly	31/07/2026
IR4A	Update local incident response plan with correct contact details. Send updated version to NRW.	03/07/2026

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 report details the site visit made on the 11th June 2026 to at the SRCL Ltd site, permit reference number EPR/PP3430UL.

Natural Resources Wales (NRW) Senior Officers Greg GARDNER and Lewis EVANS attended the SRCL Ltd Site, 12 Aneurin Bevan Avenue, Brynmenyn Industrial Estate, Bridgend, CF32 9SZ for a planned routine site inspection at 10:30pm where they were met with SRCL Ltd Management. The site was operational where the weather was dry, sunny and warm at the time of the inspection.

DISCUSSION OF PREVIOUS ACTIONS (CAR_NRW0048754)

	Action	Update
1	Review and update sites FPMP document in relation to fire breaks and site drainage cover identification. Once updated, please send revised FPMP to your regulating Officer for review.	Site are continuing to update FPMP in relation to fire breaks and have labelled correct drainage channels. New version of FPMP to be submitted to NRW by end of July
2	Please ensure the operating techniques section of your permit, when varying, includes the process of removing metal waste(s) from treated flock as per your	Complete - Site have a permit variation application with updated operating techniques submitted to NRW which is under review

	recently conducted trial (CAR_NRW0048297).	
3	Resubmit last 4 waste returns to NRW on NRW provided waste return document to ensure all the data is submitted correctly	Site have undertaken personnel changes and are currently rectifying issue with waste returns on a new system which is undergoing a trial. These will be resubmitted correctly by end of July 2026

GENERAL OBSERVATIONS

NRW Officers undertook discussions with SRCL Ltd site management took place regarding current site operations and any future intentions such as any planned maintenance / business expansion as well as an update on actions from the previous site visit on 03/07/26 (update details above as well as in CAR_NRW0048754). Site Management walked NRW Officers through the process (Photos 1 and 2) where it was noted that there were no offensive odours witnessed both inside and outside the permitted boundary and / or excessive noise / dust witnessed. Housekeeping on site was maintained to a good standard with little to no evidence of excess debris present. It was noted that the local incident response plan for the site required updating with the latest contact information for the site due to a change in personnel and operations.



Photo 1 - On site treatment of medical waste(s) at SRCL Ltd



Photo 2 - On site treatment of medical waste(s) at SRCL Ltd

ACTION: Update local incident response plan with correct contact details. Send updated version to NRW.

DEADLINE - 03/07/26

TRIAL

As outlined in previous CAR forms (CAR_NRW0048754 and CAR_NRW0048297), SRCL Ltd undertook a 7-day trial in May 2025 involving the temporary installation of a magnetic separator (Photo 3) on the treatment plant exit conveyor to extract ferrous metals from treated waste flock. Discussions during this visit confirmed that the trial was successful. The separator has since been installed as a permanent feature and is currently awaiting full commissioning. A permit variation was submitted to NRW on 16/03/2026 and will be determined in due course.



Photo 3 - Removed magnet separator which would sit on exit of line following treatment of waste(s)

FPMP (FIRE PREVENTION AND MITIGATION PLAN)

NRW officers observed several yellow clinical waste bins located to the west of the site during the inspection (Photo 4). Although no immediate risk was identified, a potential concern was noted regarding the adequacy of fire breaks, given the number of bins present and the possibility of further accumulation. It was positive to note that safe access to fire doors and firefighting equipment was maintained in the event of a fire. A similar observation was recorded during the previous site visit (CAR_NRW0048754).

It was discussed with site management that, in the event of a fire, access for the South Wales Fire and Rescue Service (SWFRS) could be restricted. It is recommended that the site reviews its Fire Prevention and Mitigation Plan (FPMP), specifically Section 2.7.1 (Generic Management Controls – Waste Storage), to ensure adequate fire breaks are maintained, particularly for external storage areas. It is also worth noting an update in the sites incident response plan is required due to a change in site personnel. Details on how to comply with your sites FPMP can be found on the attached link - [Natural Resources Wales / Fire prevention and mitigation plans](#)

Following the previous visit, the site has clearly labelled surface water and foul water drains to enable the correct deployment of drain covers and minimise the risk of uncontrolled emissions to water.



Photo 4 - Medical waste bins located outside at rear of SRCL Ltd building

ACTION: Review and update sites FPMP document in relation to fire breaks / bin storage area(s). Once updated, please send revised FPMP to your regulating Officer for review.

DEADLINE - 31/07/26

WASTE RETURN SUBMISSIONS

During discussions with site management, issues were raised regarding waste returns submissions. Although submissions have been made on time and in full, they have not been provided in a format compatible with NRW systems. This issue has been highlighted to the operator on several occasions by NRW's Waste Returns Team. Continued non-compliance may result in NRW considering an appropriate enforcement response. NRW will provide the

latest spreadsheet template for completion and resubmission of the data.

The site advised that a new internal automated system for generating waste returns is currently being trialled, with the aim of improving efficiency and ensuring submissions meet NRW requirements. The operator anticipates this system will be implemented by the end of July 2027.

The operator is reminded that submission of waste returns in a timely manner and in an acceptable format is a condition of the permit. Gaps in compliance history may lead to complications during permit transfer or surrender and may have financial implications. All outstanding returns should be amended and resubmitted in the correct format in accordance with permit requirements. The latest waste returns spreadsheet template will be issued alongside this CAR form.

ACTION: Resubmit all outstanding waste returns to NRW on NRW provided waste return document to ensure all the data is submitted correctly

DEADLINE - 31/07/26

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012

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.